

May 23, 2012

Mr. Roberto Puga, P.G., Trustee
ASARCO Texas Custodial Trust
c/o Project Navigator, Ltd.
One Pointe Drive, Suite 320
Brea, CA 92821

Subject: April 2012 Dust Monitoring Summary

Dear Mr. Puga:

Environmental Resources Management (ERM) and Malcolm Pirnie, Inc. (Malcolm Pirnie) performed dust monitoring activities at the Former ASARCO Smelter site in El Paso, Texas during the month of April 2012. When activities with the potential to generate dust were conducted on site, dust data was collected from monitoring locations near the site fence line, around the arroyo, and near La Calavera.

The following attachments are included with this letter:

- Attachment A: Figures
- Attachment B: Wind Rose Plot
- Attachment C: Tables
- Attachment D: Dust Concentration Graphs

Dust monitor locations are shown in Attachment A, Figure 1. An onsite meteorological station was used to measure wind speed and direction. A wind rose plot summarizing the wind data for the month is provided in Attachment B. Dust Concentration tables and graphs are provided in Attachments C and D, respectively.

Dust monitoring activities were conducted in accordance with the perimeter dust monitoring plan, with the following exceptions.

The MP-6 monitor, which is positioned in the North Location (Figure 1, Attachment A) was deployed to the Arroyo North Location replacing the MP-3 monitor which was being serviced from April 2nd to April 19th. MP-6 was repositioned back at the North location on April 20th, once MP-3 was operating properly. Accordingly, as presented in Table 2, Attachment C, the readings for MP-6 are represented by 'ND' for 'not deployed' for the April days which it was not at the North location.





Daily average dust concentrations were at or below the site-specific sentinel value of $43 \mu\text{g}/\text{m}^3$ for all dust monitoring locations during the month of April with the exception of the following days:

April 2nd – The daily average dust concentration for the East monitor was greater than the sentinel value.

Dusty and windy conditions existed in the El Paso area. No demolition activities took place in the proximity of the monitor. Visible dust from areas without active demolition was observed to be migrating towards the monitor when wind speeds were as high as 35 mph. A background dust evaluation was conducted on the elevated data using the upwind (West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East (downwind) location resulted in the actual dust generated on site to be $32 \mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of $43 \mu\text{g}/\text{m}^3$.

April 14th – The daily average dust concentration for all deployed monitors was greater than the sentinel value.

Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at all monitor stations regardless of proximity to construction activities. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions. Due to the high wind conditions and reduced visibility, construction activities were stopped that day and resumed on April 16.

April 26th – The daily average dust concentration for the North, North East, Arroyo North, Arroyo South and Arroyo West monitors was greater than the sentinel value.

Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at all monitor stations regardless of proximity to construction activities. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. Since not all monitors reported elevated dust concentrations, a background dust evaluation was conducted on the elevated data using the upwind (Arroyo West) monitor location. The daily average background dust concentration for the downwind (Arroyo South) monitor location was subtracted from the upwind monitor location dust concentration. The results of the background dust evaluation provided an actual dust generated on site of $4 \mu\text{g}/\text{m}^3$, which is below the site-specific sentinel value of $43 \mu\text{g}/\text{m}^3$. Therefore the elevated dust concentrations for the day are attributed to off-site conditions.

A summary of the elevated dust data is provided in Attachment C, Table 1, and the April summary of daily average dust concentration data is provided in Attachment C, Table 2. Also provided in Attachment C are the rolling 12-month elevated dust observation summaries





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organized by location. The daily average dust results for 2012 are graphed against the sentinel value in Attachment D.

Very truly yours,

MALCOLM PIRNIE, INC.

A handwritten signature in cursive script that reads "Alicia Fogg".

Alicia Fogg, PE
Project Engineer

Project 6835001

Attachments

cc: Former ASARCO Smelter Project Team





Attachment A

Figure 1



Legend

- Dust Monitoring Locations (continuous)
- Meteorological Station
- Texas Custodial Trust Property Boundary

N

0 500 1,000
Feet

SCALE 1"=500'



Attachment B

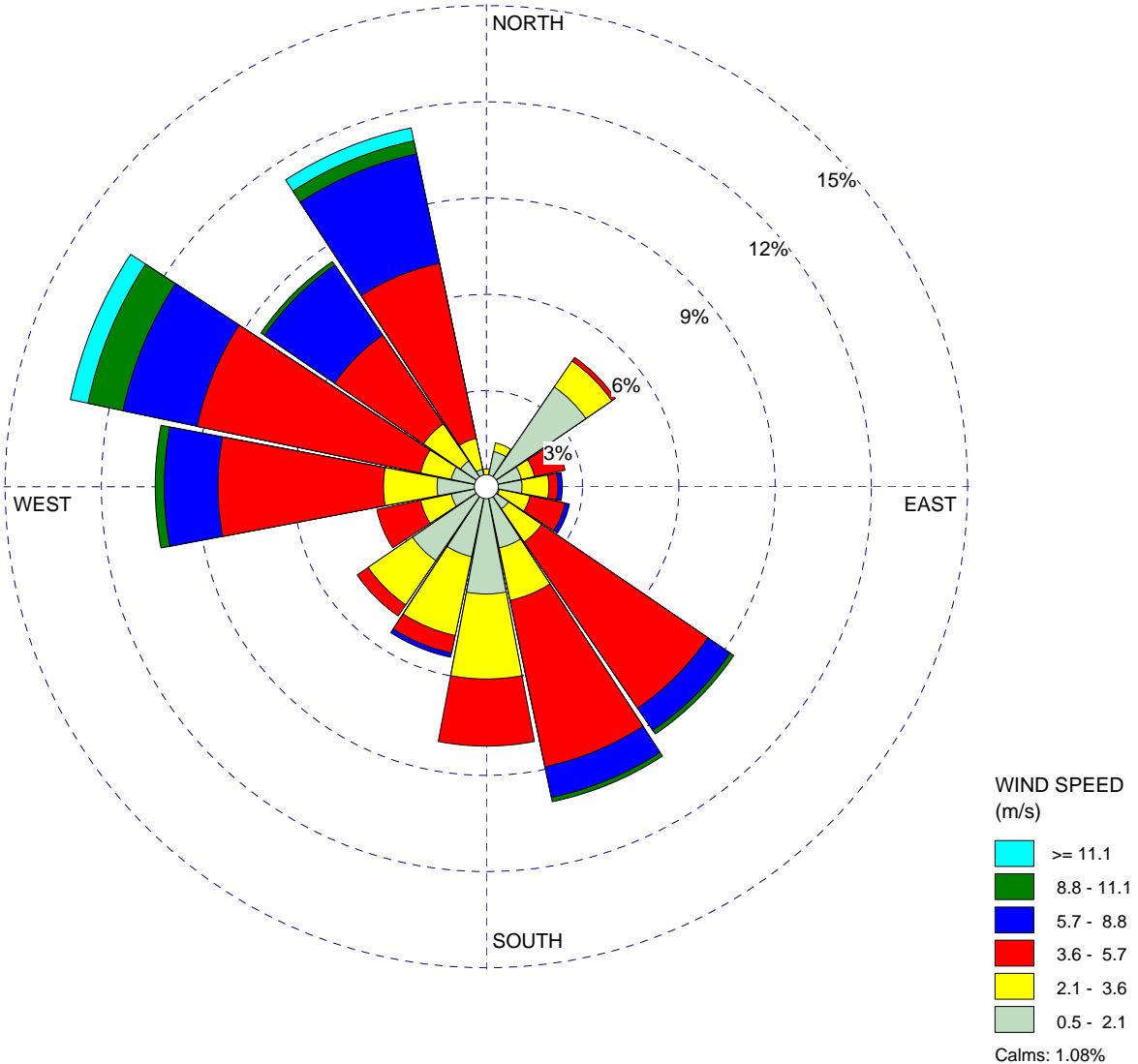
Wind Rose Plots

WIND ROSE PLOT:

**Former ASARCO El Paso Smelter
April 1-30, 2012 Dust Monitoring - Wind Rose Plot**

DISPLAY:

**Wind Speed
Direction (blowing from)**



COMMENTS:

DATA PERIOD:

**Start Date: 4/1/2012 - 00:00
End Date: 4/30/2012 - 23:00**

COMPANY NAME:

Malcolm Pirnie, Inc.

MODELER:

Karina E Correa

CALM WINDS:

1.08%

TOTAL COUNT:

719 hrs.

AVG. WIND SPEED:

3.92 m/s

DATE:

5/4/2012

PROJECT NO.:

06835001.W140



Attachment C

Tables

TABLE 1

April Elevated Dust Monitor Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Except as noted below, daily average dust readings were below the site-specific internal sentinel value of 43 $\mu\text{g}/\text{m}^3$.

| Date | Location | Wind Direction | Value ($\mu\text{g}/\text{m}^3$) | Comments | Action |
|-----------|--|---|------------------------------------|---|----------------------------------|
| 4/2/2012 | East | Low to high winds in the morning with wind speeds between 1 and 29 mph, and moderate to high winds in the afternoon with wind speeds between 9 and 35 mph. Winds were predominately out of the north west throughout the day. | 63 | Dusty and windy conditions existed in the El Paso area. No demolition activities took place in the proximity of the monitor. However, visible dust from areas without active demolition was observed to be migrating towards the monitor when wind speeds were high. A background dust evaluation was conducted on the elevated data using the upwind (West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East location resulted in the actual dust generated on site to be 32 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$. | No field modifications necessary |
| 4/14/2012 | All Monitors | Low to moderate wind speeds in the morning and moderate to high wind speeds in the afternoon and evening with winds speeds up to 30 mph. Winds are predominately out of the north west throughout the day. | 160 | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at all monitor stations regardless of proximity to construction activities. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions. | No field modifications necessary |
| 4/26/2012 | North, Northeast, Calavera, Arroyo West, Arroyo South and Arroyo North | Low to moderate wind speeds in the morning and moderate to high wind speeds in the afternoon and evening with winds speeds up to 35 mph. Winds are predominately out of the west throughout the day. | 57 | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at all monitor stations regardless of proximity to construction activities. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. Since not all monitors reported elevated dust concentrations, a background dust evaluation was conducted on the elevated data using the upwind (Arroyo West) monitor location. The daily average background dust concentration for the downwind (Arroyo South) monitor location was subtracted from the upwind monitor location dust concentration. The results of the background dust evaluation provided an actual dust generated on site of 4 $\mu\text{g}/\text{m}^3$, which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$. Therefore the elevated dust concentrations for the day are attributed to off-site conditions. | No field modifications necessary |

TABLE 2

April Daily Average Dust Monitoring Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

| Week ending April 7th | | | | | | |
|------------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|
| Date | Monday, April 02, 2012 | Tuesday, April 03, 2012 | Wednesday, April 04, 2012 | Thursday, April 05, 2012 | Friday, April 06, 2012 | Saturday, April 07, 2012 |
| Location | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) |
| South | 21 | 7 | 11 | 11 | 13 | |
| West | 31 | 10 | 16 | 17 | 22 | |
| East | 63 | 14 | 12 | 12 | 13 | |
| North | ND | ND | ND | ND | ND | ND |
| North East | 18 | 11 | 9 | 12 | 11 | 19 |
| North West | 25 | 11 | 9 | 11 | 11 | 19 |
| Calavera | 4 | 5 | 4 | 5 | 5 | 9 |
| Arroyo West | 16 | 12 | 12 | 14 | 17 | 22 |
| Arroyo South | 15 | 11 | 10 | 12 | 11 | 18 |
| Arroyo North | 7 | 7 | 7 | 9 | 9 | 16 |
| Week ending April 14th | | | | | | |
| Date | Monday, April 09, 2012 | Tuesday, April 10, 2012 | Wednesday, April 11, 2012 | Thursday, April 12, 2012 | Friday, April 13, 2012 | Saturday, April 14, 2012 |
| Location | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) |
| South | 16 | 15 | 18 | 13 | 9 | |
| West | 17 | 17 | 22 | 14 | 15 | |
| East | 15 | 15 | 18 | 17 | 10 | |
| North | ND | ND | ND | ND | ND | ND |
| North East | 19 | 15 | 14 | 11 | 15 | 189 |
| North West | 19 | 17 | 15 | 11 | 13 | 188 |
| Calavera | 10 | 7 | 6 | 5 | 6 | 108 |
| Arroyo West | 21 | 2 | 17 | 11 | 15 | 187 |
| Arroyo South | 19 | 14 | 13 | 11 | 12 | 168 |
| Arroyo North | 14 | 12 | 11 | 8 | 10 | 118 |
| Week ending April 21st | | | | | | |
| Date | Monday, April 16, 2012 | Tuesday, April 17, 2012 | Wednesday, April 18, 2012 | Thursday, April 19, 2012 | Friday, April 20, 2012 | Saturday, April 21, 2012 |
| Location | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) |
| South | 11 | 28 | 25 | 14 | 12 | |
| West | 14 | 23 | 32 | 21 | 14 | |
| East | 10 | 19 | 28 | 29 | 12 | |
| North | ND | ND | ND | ND | 12 | 11 |
| North East | 13 | 24 | 23 | 16 | 10 | 13 |
| North West | 13 | 24 | 23 | 3 | 11 | 13 |
| Calavera | 5 | 11 | 11 | 5 | 4 | 6 |
| Arroyo West | 16 | 31 | 26 | 16 | 15 | 16 |
| Arroyo South | 12 | 25 | 22 | 13 | 9 | 13 |
| Arroyo North | 11 | 20 | 18 | 9 | 10 | 14 |
| Week ending April 28th | | | | | | |
| Date | Monday, April 23, 2012 | Tuesday, April 24, 2012 | Wednesday, April 25, 2012 | Thursday, April 26, 2012 | Friday, April 27, 2012 | Saturday, April 28, 2012 |
| Location | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) |
| South | 16 | 27 | 8 | 23 | 10 | |
| West | 20 | 33 | 16 | 30 | Malfunction | |
| East | 15 | 27 | 9 | 33 | 9 | |
| North | 16 | 20 | 8 | 7 | 7 | 10 |
| North East | 18 | 25 | 10 | 91 | 12 | 17 |
| North West | 19 | 22 | 9 | 21 | 11 | 10 |
| Calavera | 9 | 11 | 4 | 38 | 3 | 4 |
| Arroyo West | 21 | 26 | 11 | 89 | 11 | 16 |
| Arroyo South | 20 | 24 | 9 | 85 | 9 | 15 |
| Arroyo North | 23 | 26 | 12 | 87 | 10 | 15 |
| Week ending May 5th | | | | | | |
| Date | Monday, April 30, 2012 | Tuesday, May 01, 2012 | Wednesday, May 02, 2012 | Thursday, May 03, 2012 | Friday, May 04, 2012 | Saturday, May 05, 2012 |
| Location | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) | Average Reading (ug/m ³) |
| South | 12 | | | | | |
| West | 20 | | | | | |
| East | 14 | | | | | |
| North | 11 | | | | | |
| North East | 14 | | | | | |
| North West | 11 | | | | | |
| Calavera | 5 | | | | | |
| Arroyo West | 14 | | | | | |
| Arroyo South | 11 | | | | | |
| Arroyo North | 13 | | | | | |

NOTES:

1. Readings indicate PM₁₀ dust based on direct read monitoring from TSI DustTrak II equipment.
2. Gray cell indicates that dust monitoring was not conducted that day because there were no demolition or remediation activities that day.
3. ND indicates that monitor was not deployed as detailed in the report.
4. Readings with 'Malfunction' listed were taken down for servicing and therefore no data was reported.

Dust Monitor Summary
South Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

| Date | Location | Comments |
|------------|----------|---|
| 9/13/2010 | South | Elevated dust data was collected from a location upwind of site activities. Levels are higher than visible dust levels indicating unit malfunction since visible dust was not present. (Data point exceeds graph scale.) |
| 9/21/2010 | South | Elevated dust data was collected from a location upwind/crosswind of site activities, therefore the elevated dust readings are likely due to off-site conditions. |
| 10/30/2010 | South | Elevated dust data was collected from a location upwind/crosswind of site activities. No link to daily demolition activities observed. |
| 2/8/2011 | South | Significant dust storm occurred during the day limiting visibility on-site. In addition, a railroad crew was working east of site and was generating dust. |
| 3/7/2011 | South | High wind and dust advisory in effect throughout the day. |
| 3/15/2011 | South | Site work was not performed upwind of the East and South dust monitor locations indicating the elevated data was due to off-site conditions. |
| 4/4/2011 | South | Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day. |
| 4/14/2011 | South | Dusty and windy conditions for the entire El Paso and Juarez area. No site work was performed at the Southern end of the site. All other monitor stations were reading concentrations just below the sentinel value indicating that the elevated readings were due to off-site conditions. |
| 4/26/2011 | South | Dusty and windy conditions for the entire El Paso and Juarez area. National Weather Service issued Wind Advisory and Hazardous Weather Outlook throughout the day. Heavy smoke from a large fire west of the site was also observed migrating onto the site in the late afternoon. |
| 5/9/2011 | South | Dusty and windy conditions for the entire El Paso and Juarez area. National Weather Service issued Wind Advisory and Hazardous Weather Outlook throughout the day. Heavy smoke from a large fire west of the site was also observed migrating onto the site in the late afternoon. |
| 6/7/2011 | South | All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions. |
| 9/23/2011 | South | All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions. |
| 11/2/2011 | South | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 11/29/2011 | South | Hazy atmosphere in the morning and the smell of smoke was observed onsite throughout the morning. No demolition activities were performed in the southern part of site. Elevated readings are attributed to off-site conditions. |
| 2/28/2012 | South | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 3/7/2012 | South | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions. |

Dust Monitor Summary
West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

| Date | Location | Comments |
|------------|----------|---|
| 9/21/2010 | West | Elevated dust data was collected from a location upwind/crosswind of site activities; therefore, the elevated dust readings were due to off-site conditions. |
| 11/10/2010 | West | Readings were due to a calibration error. All other monitor stations reported daily average values for total dust from 7 to 14 $\mu\text{g}/\text{m}^3$. No link to on-site demolition activities observed. |
| 2/8/2011 | West | Significant dust storm occurred during the day limiting visibility on-site. In addition, a railroad crew, not associated with the project, was working east of site and was generating dust. |
| 2/14/2011 | West | Heavy smoke from several large grass fires west of the site was observed migrating onto the site. In addition, a railroad crew, not associated with the project, was working east of site and was generating dust. |
| 3/7/2011 | West | High wind and dust advisory was in effect throughout the day. |
| 3/11/2011 | West | Elevated dust data was reported upwind/crosswind of site activities indicating the elevated data was due to off-site conditions. |
| 3/17/2011 | West | Higher sustained winds were out of the west in the afternoon. Elevated total dust readings were observed upwind of the site activities indicating that the elevated readings were due to off-site conditions. |
| 3/21/2011 | West | Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day. |
| 3/24/2011 | West | Heavy equipment not associated with the project was working on the river embankment west of the site near the west monitor location. Dust generated from the work on the river embankment was observed blowing across Paisano Dr. and onto the site. Elevated dust data was observed upwind of site activities. |
| 4/26/2011 | West | Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day. |
| 5/9/2011 | West | Dusty and windy conditions for the entire El Paso and Juarez area. National Weather Service issued Wind Advisory and Hazardous Weather Outlook throughout the day. Heavy smoke from a large fire west of the site was also observed migrating onto the site in the late afternoon. |
| 6/7/2011 | West | All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions. |
| 6/24/2011 | West | Subtracting background dust from the average dust reading for the West monitor location results in the actual dust generated on site to be 24 $\mu\text{g}/\text{m}^3$ for the West monitor location. Accounting for background dust concentration results in site generated dust below the sentinel value. |

Dust Monitor Summary
North West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

| Date | Location | Comments |
|------------|------------|---|
| 10/1/2010 | North West | Dust readings are higher than visible dust levels indicating unit malfunction since visible dust was not present. (Data point exceeds graph scale.) |
| 10/2/2010 | North West | Dust readings are higher than visible dust levels indicating unit malfunction since visible dust was not present. (Data point exceeds graph scale.) |
| 2/8/2011 | North West | Significant dust storm occurred during the day limiting visibility on-site. In addition, a railroad crew was working east of site and was generating dust. |
| 3/7/2011 | North West | High wind and dust advisory in effect throughout the day. |
| 4/4/2011 | North West | Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day. |
| 4/26/2011 | North West | Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day. |
| 6/1/2011 | North West | Dusty conditions developed in the afternoon. Accounting for background dust concentration results in site generated dust below the sentinel value. |
| 6/7/2011 | North West | All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions. |
| 9/23/2011 | North West | All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions. |
| 11/2/2011 | North West | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 11/30/2011 | North West | The surrounding atmosphere was hazy throughout the day. Monitor stations upwind of site activities and monitors with no demolition activities in their proximity recorded elevated data. The elevated readings are attributed to off-site conditions. |
| 12/1/2011 | North West | Windy and hazy conditions existed throughout the day and the surrounding atmospheric conditions were poor. Subtracting background dust from the average dust reading for the North West monitor results in the actual dust generated on site to be 27 ug/m3 for the North West monitor. Accounting for background dust concentration places site generated dust below the sentinel value. |

Dust Monitor Summary
North Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

| Date | Location | Comments |
|------------|----------|---|
| 9/22/2010 | North | Elevated readings were noted during equipment set up and take down while there were no demolition activities. The average total dust concentrations while demolition activities were being performed onsite was 11.6 $\mu\text{g}/\text{m}^3$. |
| 2/8/2011 | North | Significant dust storm occurred during the day limiting visibility on-site. In addition, a railroad crew, not associated with the project, was working east of site and was generating dust. |
| 2/14/2011 | North | Heavy smoke from several large grass fires west of the site was observed migrating onto the site. In addition, a railroad crew, not associated with the project, was working East of site and was generating dust. |
| 2/25/2011 | North | Equipment malfunctioned and reported erroneous results. The North monitoring location was generally upwind or crosswind of site activities. |
| 3/7/2011 | North | High wind and dust advisory in effect throughout the day. |
| 4/26/2011 | North | Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day. |
| 6/7/2011 | North | All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions. |
| 6/8/2011 | North | Dusty and hazy conditions developed in the afternoon. Accounting for background dust concentration results in site generated dust below the sentinel value. |
| 8/29/2011 | North | Subtracting background dust from the average dust reading for the North monitor station results in the actual dust generated on site to be 43 ug/m^3 for the North monitor station. Accounting for background dust concentration places site generated dust at the sentinel value. |
| 8/30/2011 | North | Subtracting background dust from the average dust reading for the North monitor station results in the actual dust generated on site to be 12 ug/m^3 for the North monitor station. Accounting for background dust concentration places site generated dust below the sentinel value. |
| 8/31/2011 | North | Subtracting background dust from the average dust reading for the North monitor station results in the actual dust generated on site to be 16 ug/m^3 for the North monitor station. Accounting for background dust concentration places site generated dust below the sentinel value. |
| 9/23/2011 | North | All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions. |
| 11/2/2011 | North | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 11/30/2011 | North | The surrounding atmosphere was hazy throughout the day. Monitor stations upwind of site activities and monitors with no demolition activities in their proximity recorded elevated data. The elevated readings are attributed to off-site conditions. |
| 4/26/2012 | North | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions. |

Dust Monitor Summary
North East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

| Date | Location | Comments |
|------------|------------|---|
| 1/31/2011 | North East | Significant dust storm occurred during the day limiting visibility on-site. |
| 2/8/2011 | North East | Significant dust storm occurred during the day limiting visibility on-site. In addition, a railroad crew, not associated with the project, was working east of site and was generating dust. |
| 3/7/2011 | North East | High wind and dust advisory in effect throughout the day. |
| 3/11/2011 | North East | Elevated dust data was reported upwind/crosswind of site activities indicating the elevated data was due to off-site conditions. |
| 4/4/2011 | North East | Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day. |
| 4/26/2011 | North East | Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day. |
| 6/2/2011 | North East | Dusty conditions developed in the afternoon. Accounting for background dust concentration results in site generated dust below the sentinel value. |
| 6/7/2011 | North East | All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions. |
| 6/8/2011 | North East | Dusty and hazy conditions developed in the afternoon. Accounting for background dust concentration results in site generated dust below the sentinel value. |
| 6/13/2011 | North East | Dusty and hazy conditions developed in the afternoon. Accounting for background dust concentration results in site generated dust below the sentinel value. |
| 6/14/2011 | North East | The National Weather Service issued a Special Weather Statement explaining that poor air quality across much of the Southwest was due to wildfire smoke and would continue throughout the week. Accounting for background readings due to wildfire smoke results in site generated dust below the sentinel value. |
| 9/23/2011 | North East | All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions. |
| 11/2/2011 | North East | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 11/30/2011 | North East | The surrounding atmosphere was hazy throughout the day. Monitor stations upwind of site activities and monitors with no demolition activities in their proximity recorded elevated data. The elevated readings are attributed to off-site conditions. |
| 12/1/2011 | North East | Windy and hazy conditions existed throughout the day, and the surrounding atmospheric conditions were poor. Subtracting background dust from the average dust reading for the North East monitor results in the actual dust generated on site to be 30 ug/m3 for the North East monitor. Accounting for background dust concentration places site generated dust below the sentinel value. |
| 2/28/2012 | North East | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions. |

Dust Monitor Summary
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

| Date | Location | Comments |
|------------|----------|---|
| 1/31/2011 | East | Significant dust storm occurred during the day limiting visibility on-site. |
| 2/8/2011 | East | Significant dust storm occurred during the day limiting visibility on-site. In addition, a railroad crew, not associated with the project, was working east of site and was generating dust. |
| 3/7/2011 | East | High wind and dust advisory was in effect throughout the day. |
| 3/11/2011 | East | Windy and dusty conditions observed throughout the day. Sustained winds out of the west and northwest in the afternoon. The elevated dust data was reported upwind/crosswind of site activities indicating the elevated data was due to off-site conditions. |
| 3/15/2011 | East | Site work was not performed upwind of the East and South dust monitor stations indicating the elevated data was due to off-site conditions. |
| 4/4/2011 | East | Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day. |
| 4/26/2011 | East | Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day. |
| 6/7/2011 | East | All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions. |
| 9/23/2011 | East | All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions. |
| 10/6/2011 | East | Subtracting background dust from the average dust reading for the East monitor station results in the actual dust generated on site to be 29 ug/m3 for the East monitor station. Accounting for background dust concentration places site generated dust below the sentinel value. |
| 11/2/2011 | East | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 11/21/2011 | East | Dusty and windy conditions existed in the El Paso area causing dust from areas with no demolition activities to migrate towards the monitor station. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. Wind speeds up to 41 mph were recorded, and no demolition activities occurred in the proximity of the monitor station. The times that elevated levels of dust were recorded directly correlate with times that high winds occurred; the elevated dust concentration is attributed to off-site conditions |
| 11/30/2011 | East | The surrounding atmosphere was hazy throughout the day. Monitor stations upwind of site activities and monitors with no demolition activities in their proximity recorded elevated data. The elevated readings are attributed to off-site conditions. |
| 1/16/2012 | East | The daily average dust concentration for the East monitor was greater than the sentinel value. Windy and hazy conditions existed in the El Paso and Juarez area. The National Weather Service issued a Hazardous Weather Outlook for the afternoon, and wind speeds up to 35 mph were recorded on site. Demolition activities were taking place near the monitor, and dust suppression activities were implemented during the demolition activities. However, visible dust from areas without active demolition was observed to migrating towards the monitor when wind speeds were high. A background dust evaluation was conducted on the elevated data and resulted in the actual dust generated on site to be 31 ug/m3 which is below the site-specific sentinel value of 43 ug/m3. |
| 2/28/2012 | East | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 3/6/2012 | East | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 3/7/2012 | East | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions. |

Dust Monitor Summary
Calavera Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

| Date | Location | Comments |
|------------|----------|---|
| 10/30/2010 | Calavera | The Calavera and North monitor stations were stationed generally downwind of site activities. The North monitor station was closer to site activities than the Calavera dust monitor station. The North monitor station did not report elevated dust data. As such, elevated dust data from the Calavera monitor station is attributed to offsite conditions and not a result of on site activities. |
| 1/31/2011 | Calavera | Significant dust storm occurred during the day limiting visibility on-site. |
| 2/8/2011 | Calavera | Significant dust storm occurred during the day limiting visibility on-site. In addition, a railroad crew, not associated with the project, was working east of site and was generating dust. |
| 6/7/2011 | Calavera | All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions. |
| 9/23/2011 | Calavera | All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions. |
| 4/14/2012 | Calavera | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 4/26/2012 | Calavera | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions. |

Dust Monitor Summary
Arroyo West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

| Date | Location | Comments |
|------------|-------------|---|
| 11/30/2011 | Arroyo West | The surrounding atmosphere was hazy throughout the day. Monitor stations upwind of site activities and monitors with no demolition activities in their proximity recorded elevated data. The elevated readings are attributed to off-site conditions. |
| 4/14/2012 | Arroyo West | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 4/26/2012 | Arroyo West | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions. |

Dust Monitor Summary
Arroyo South Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

| Date | Location | Comments |
|------------|--------------|--|
| 12/10/2011 | Arroyo South | The surrounding atmosphere was generally hazy throughout the day. The smell of smoke was observed onsite indicating that smoke particles from surrounding fires were migrating onto the site. Perimeter monitoring stations, including monitors upwind of site activities and monitors with no construction activities in their proximity, recorded elevated data. The elevated readings are attributed to off-site conditions. |
| 1/31/2012 | Arroyo South | The daily average dust concentration for the Arroyo South monitor was greater than the sentinel value. Landfill construction activities took place immediately upwind of to the monitor during the afternoon hours. Dust suppression was implemented to reduce the dust generated by the activity. Additionally, the monitor was re-located to a position further downwind of the construction activities to protect the monitor from damage and allow for accurate measurement of dust concentrations leaving the area. Elevated dust concentrations were not observed at monitors located off-site and downwind of the Arroyo south monitor. A background dust evaluation was conducted using the upwind (Arroyo North) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo South location resulted in the actual dust generated on site to be 29 ug/m3 which is below the site-specific sentinel value of 43 ug/m3. |
| 2/28/2012 | Arroyo South | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 4/14/2012 | Arroyo South | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 4/26/2012 | Arroyo South | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions. |

Dust Monitor Summary
Arroyo North Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

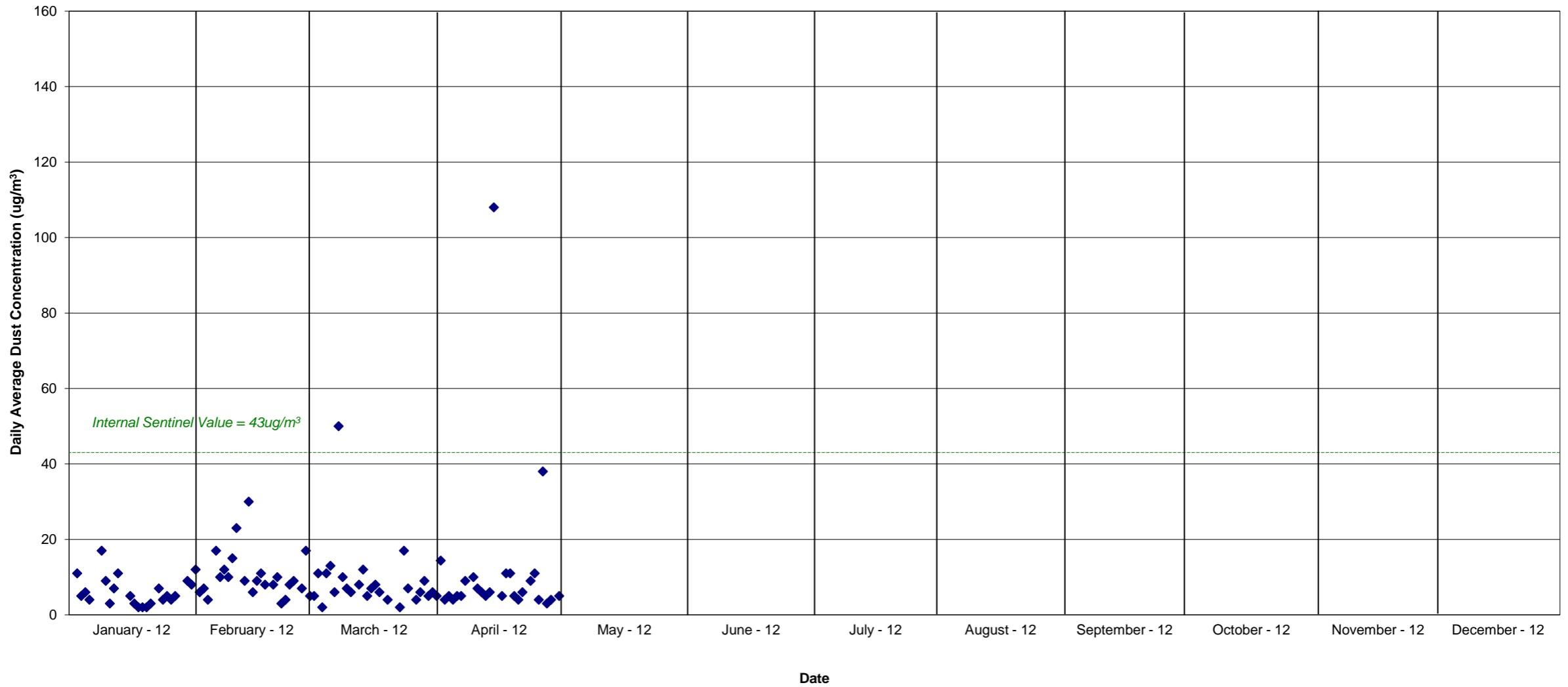
| Date | Location | Comments |
|-----------|--------------|---|
| 4/14/2012 | Arroyo North | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 4/26/2012 | Arroyo North | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions. |



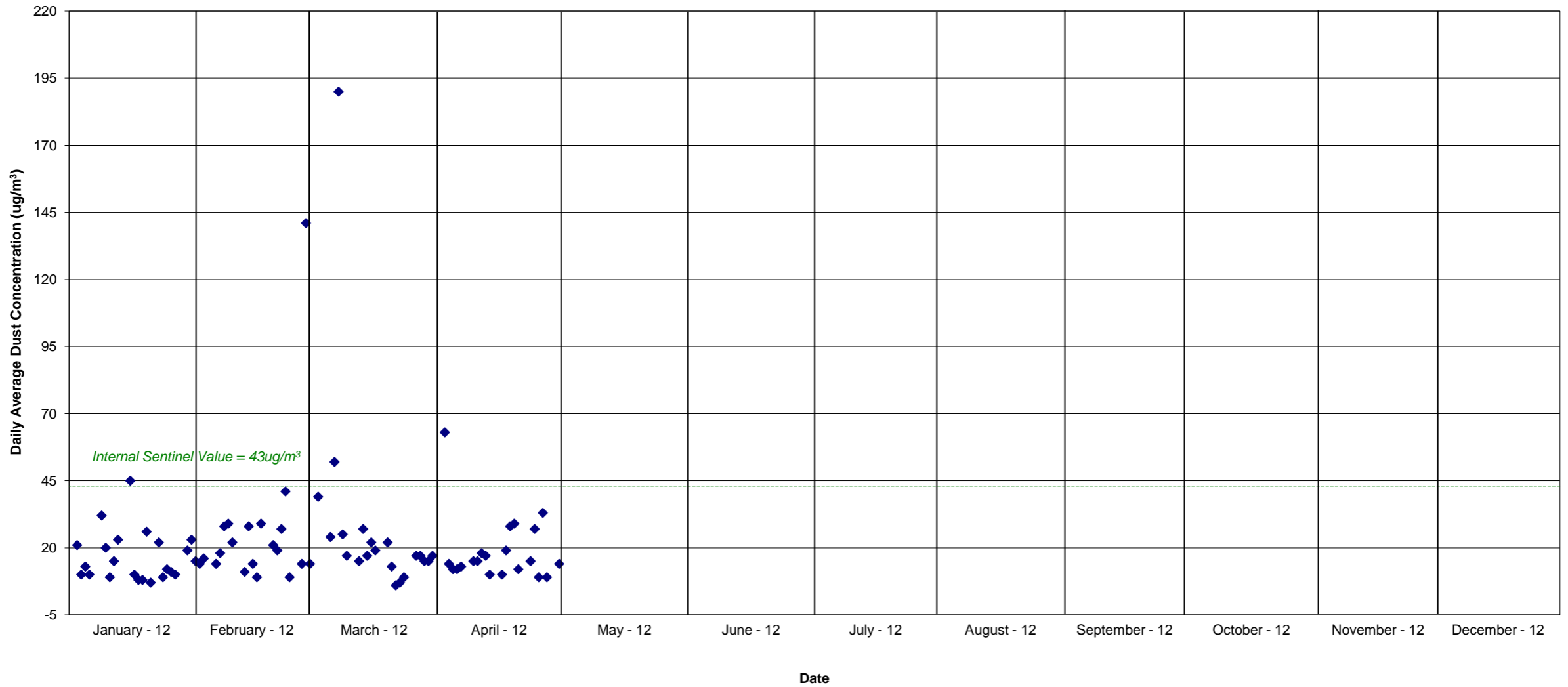
Attachment D

Dust Concentration Graphs

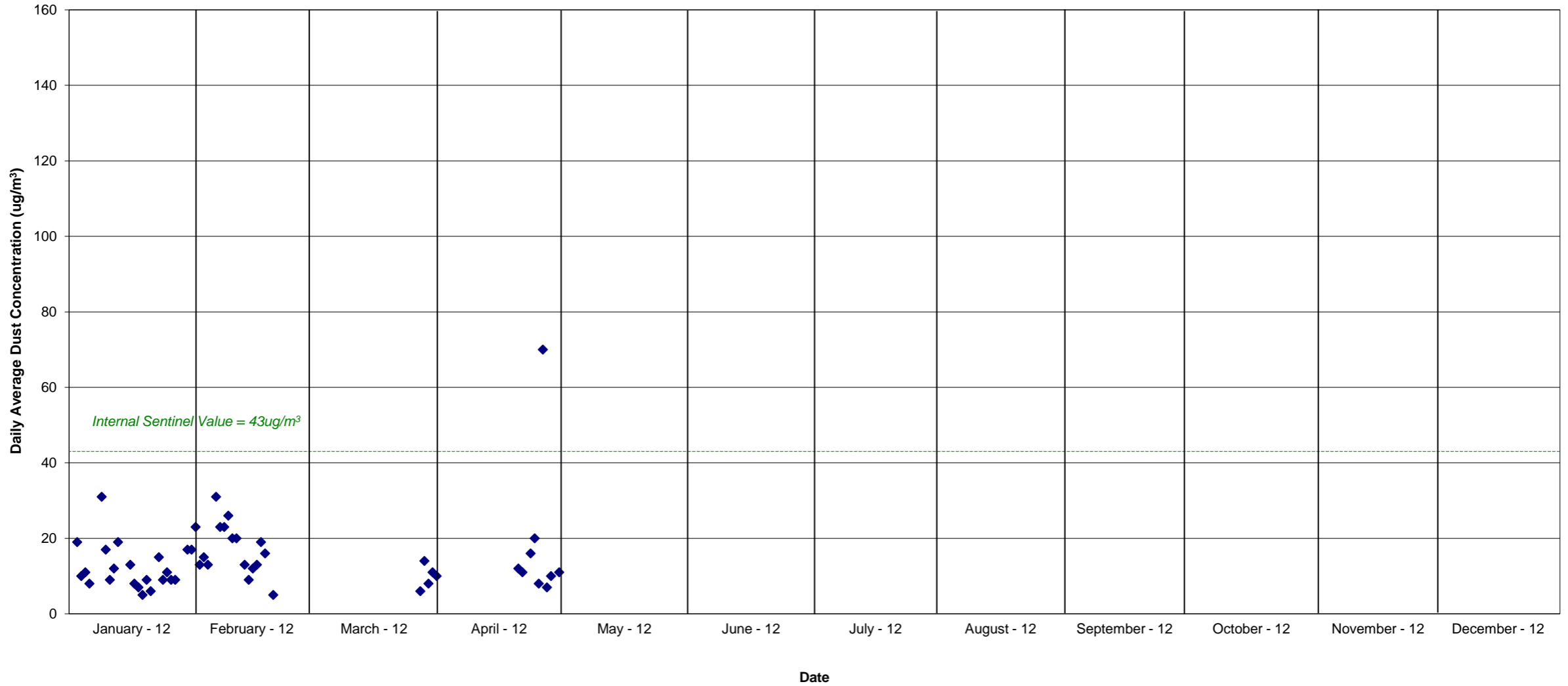
2012 Dust Monitor Summary
Calavera Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



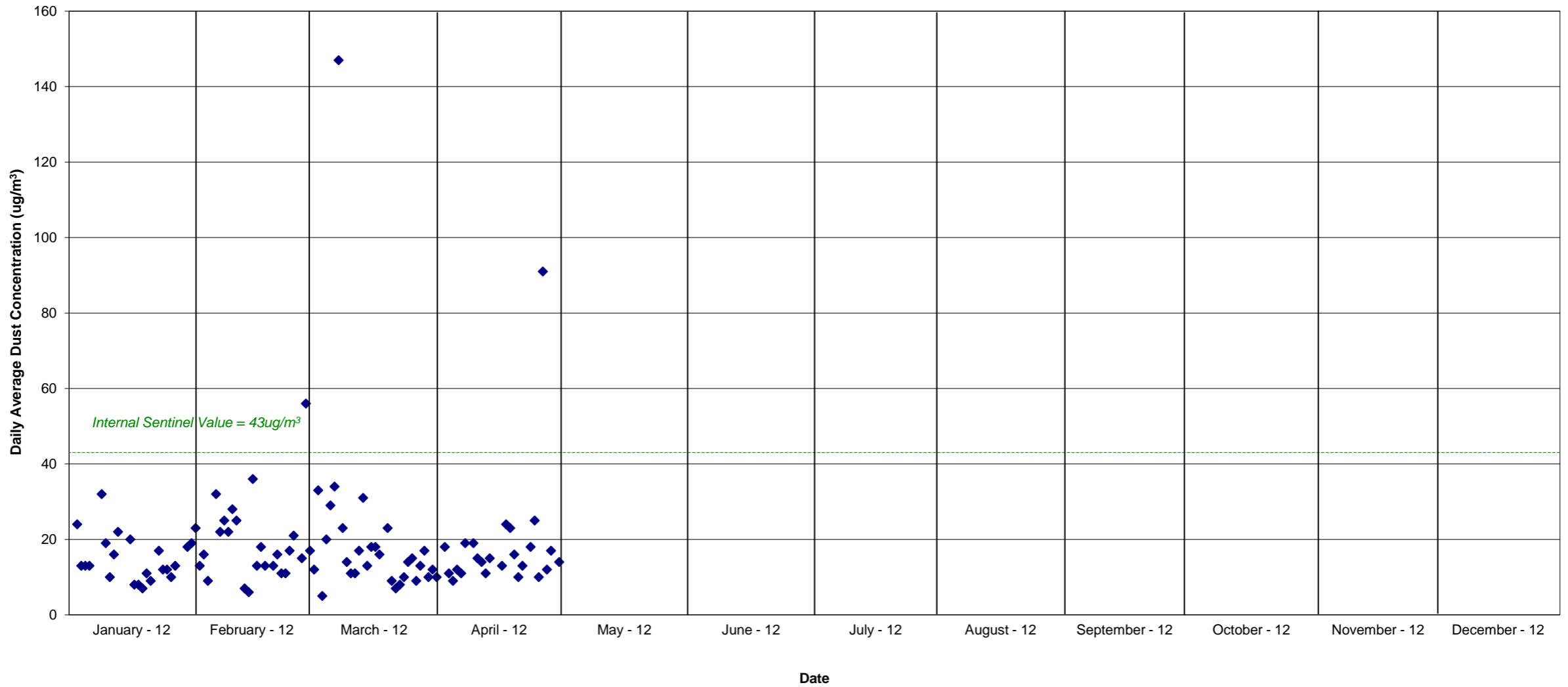
2012 Dust Monitor Summary
East Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



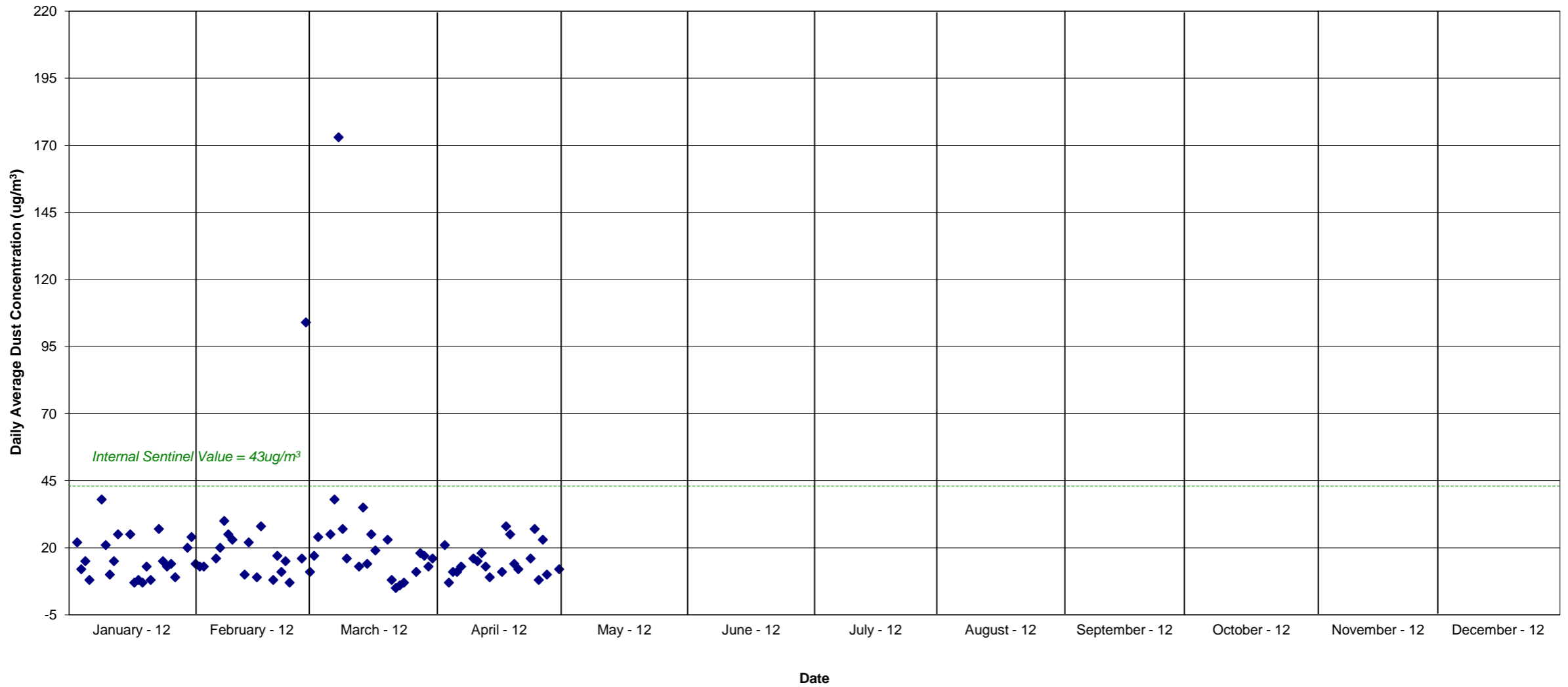
2012 Dust Monitor Summary
North Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



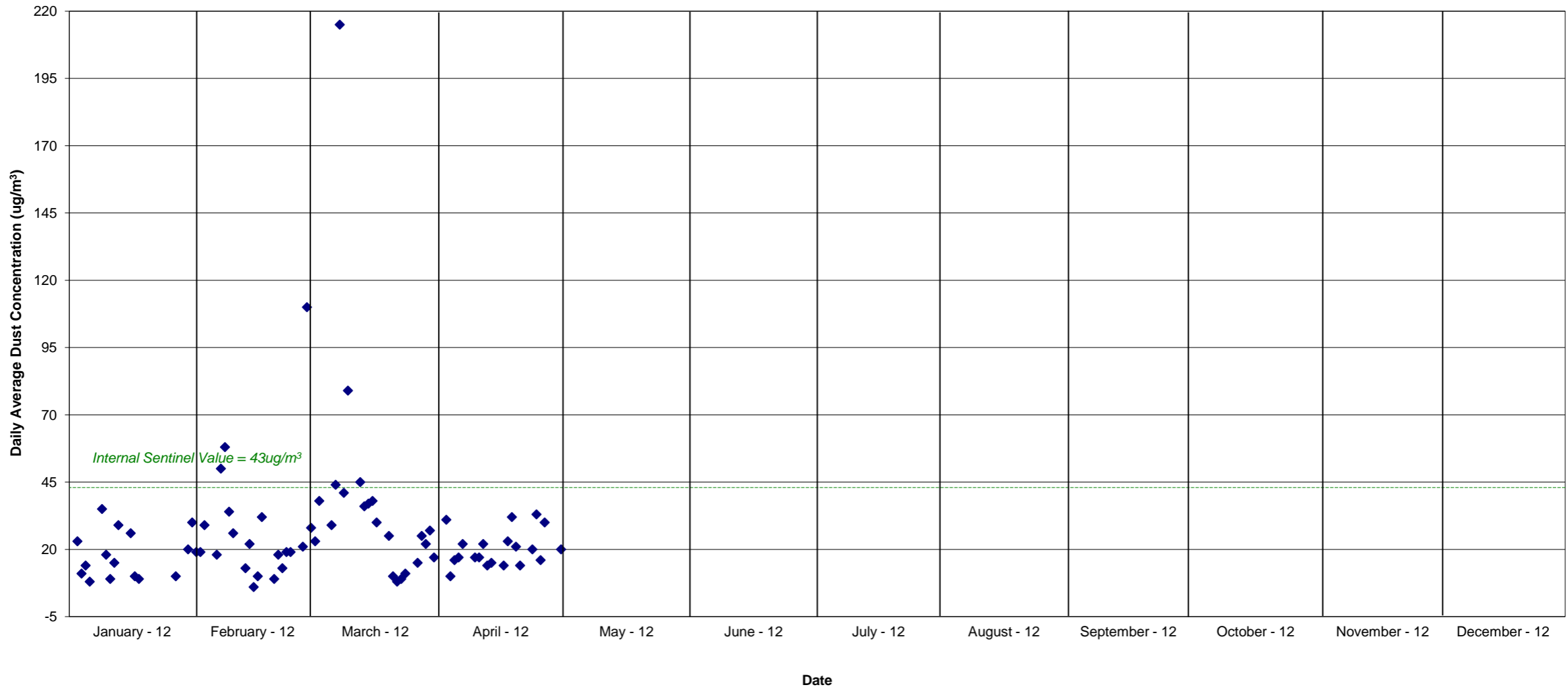
2012 Dust Monitor Summary
North East Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



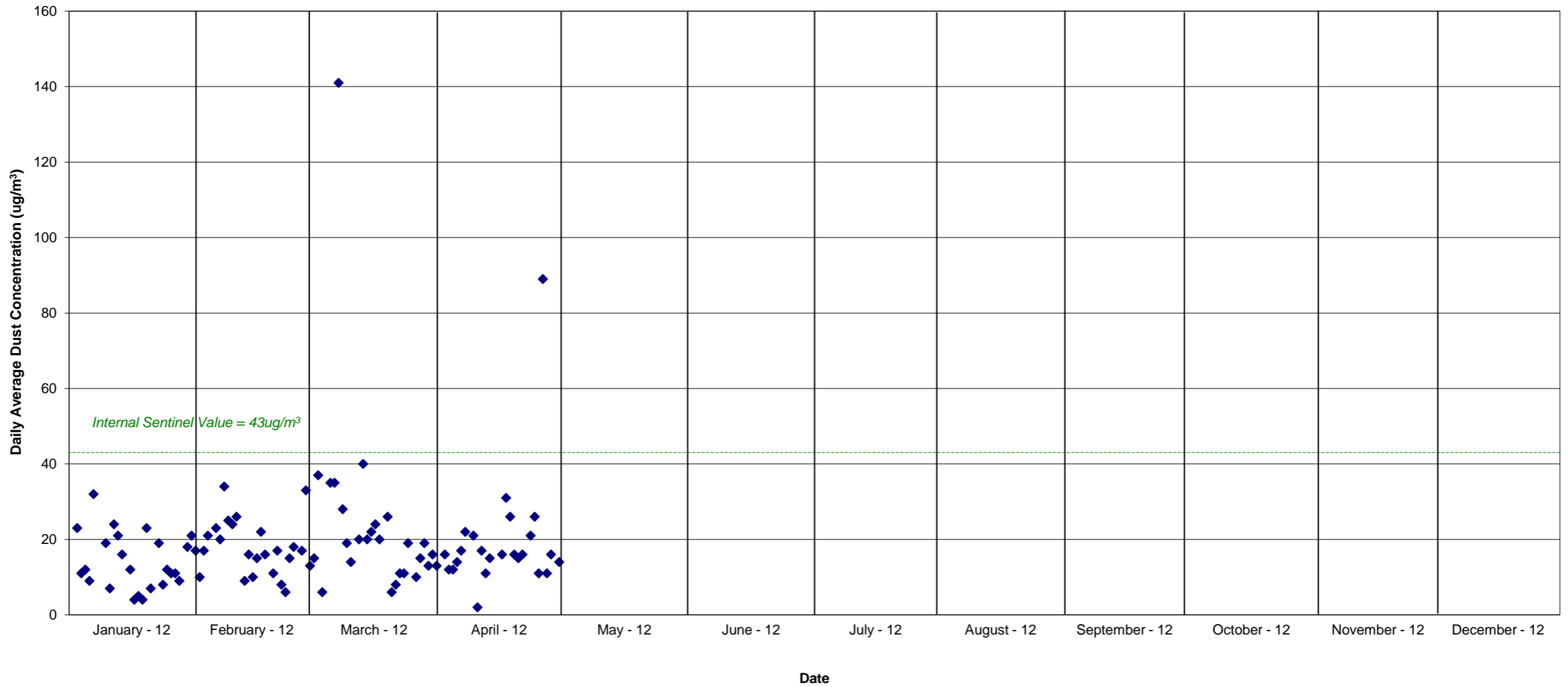
2012 Dust Monitor Summary
South Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



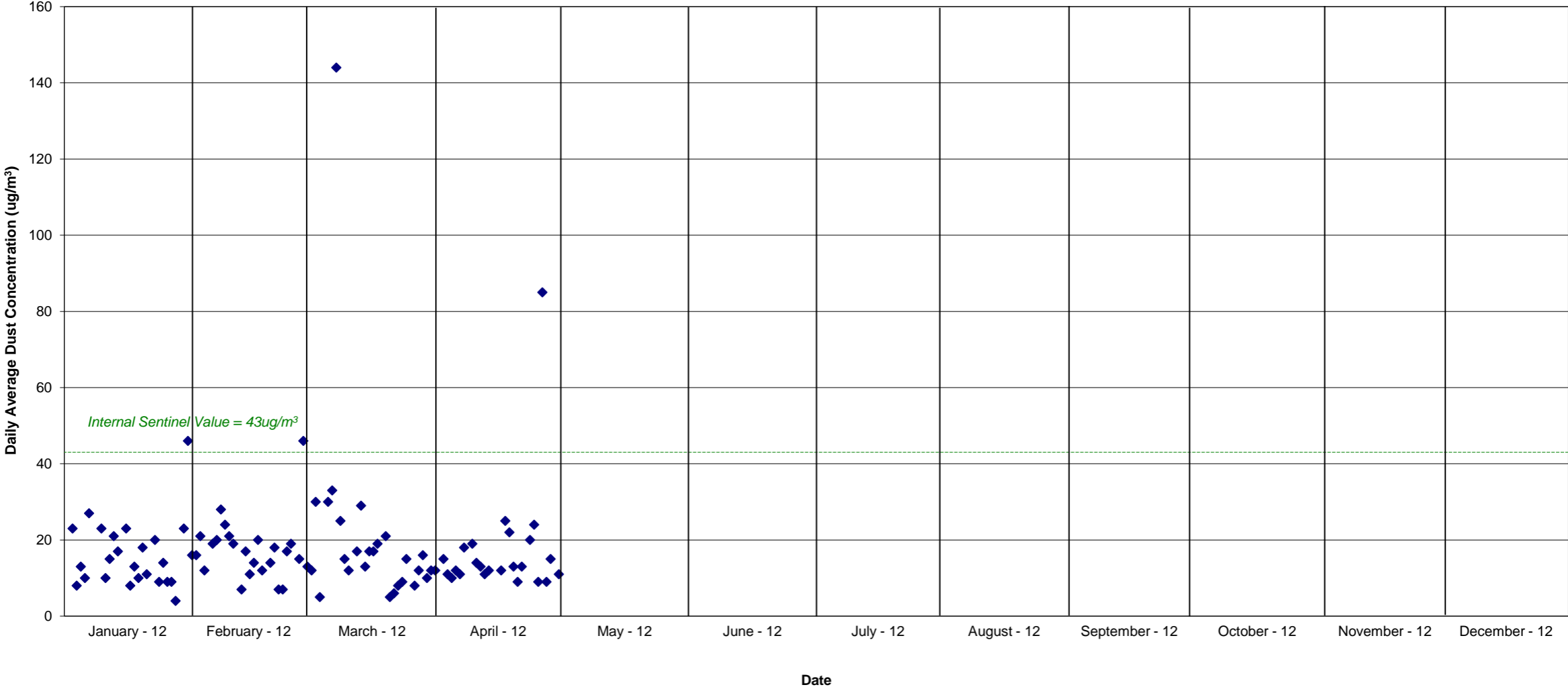
2012 Dust Monitor Summary
West Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



2012 Dust Monitor Summary
Arroyo West Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



2012 Dust Monitor Summary
Arroyo South Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



2012 Dust Monitor Summary
Arroyo North Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas

