

June 21, 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: May 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 May 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: Figure
- 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 assess wind speed and direction. A Wind Rose Plot summarizing the wind data for the month is provided in Attachment B. Dust Concentration graphs for the calendar year are provided in Attachment D.

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

The MP-2 monitor which positioned in the Arroyo South location (Attachment A, Figure 1) was sent to TSI for service on May 15th. The MP-6 monitor which is positioned in the North location was deployed to the Arroyo South location replacing the MP-2 monitor and it remained in the Arroyo South location for the remainder of the May monitoring period. Accordingly, as presented in Attachment C, Table 2, the readings for MP-6 are represented by 'ND' for 'not deployed' from May 16th until the end of the month.





Mr. Roberto Puga, P.G.
Texas Custodial Trust
June 21, 2012

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A summary of the May elevated dust data is provided in Attachment C, Table 1, and the May daily average dust concentration data is provided in Attachment C, Table 2. Also provided in Attachment C is the rolling 12-month dust observation summaries organized by 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 May with the exception of the following:

May 23rd – The daily average dust concentration for the South, West and East monitors was greater than the sentinel value.

Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at downwind monitoring locations. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo 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 $13 \mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of $43 \mu\text{g}/\text{m}^3$.

Very truly yours,

MALCOLM PIRNIE, INC.

Alicia Fogg, PE
Project Engineer

Project 6835001

Attachments

cc: Former ASARCO Smelter Project Team





Attachment A

Figure 1





Attachment B

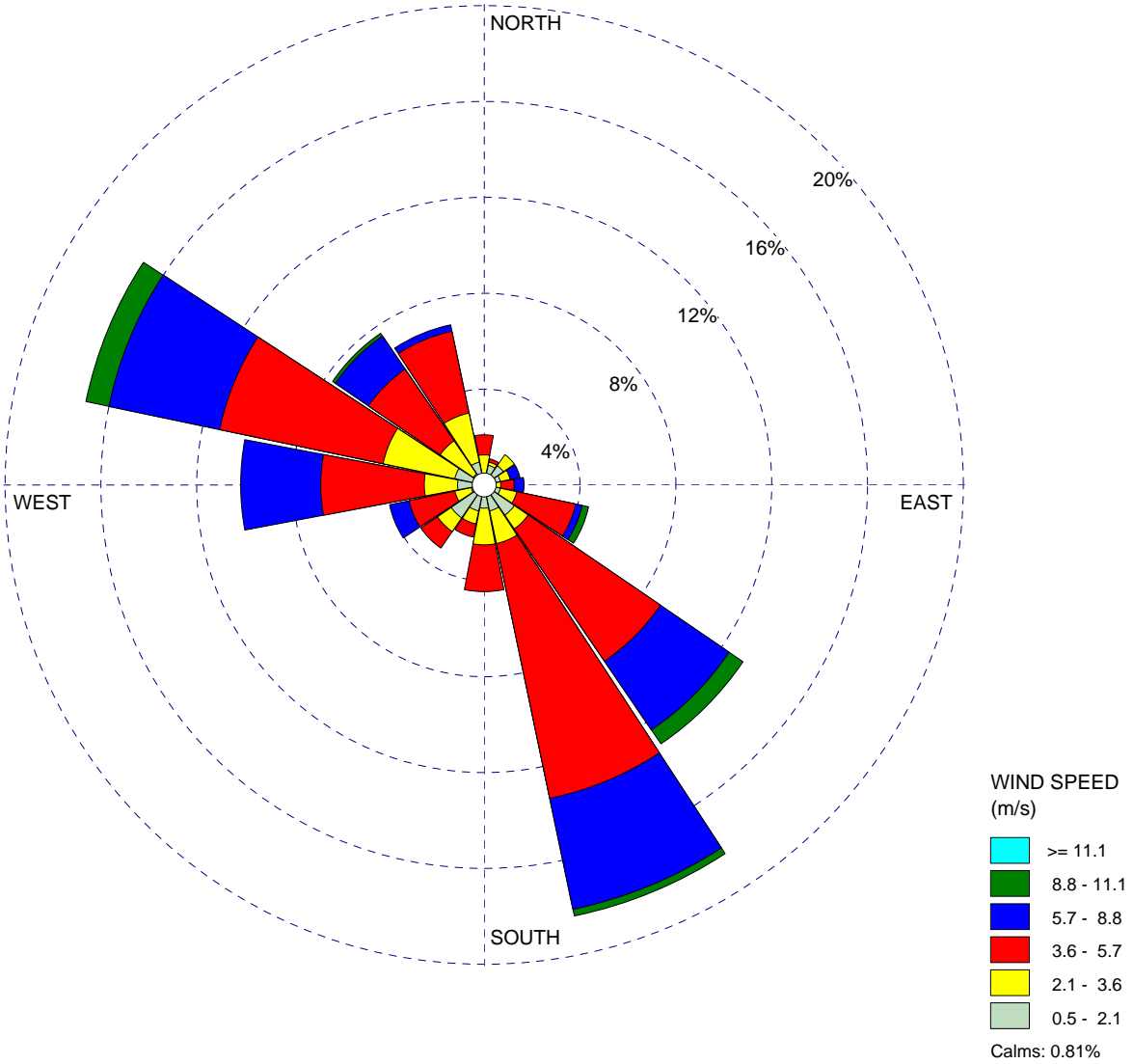
Wind Rose Plots

WIND ROSE PLOT:

**Former ASARCO El Paso Smelter
May 1-31, 2012 Dust Monitoring - Wind Rose Plot**

DISPLAY:

**Wind Speed
Direction (blowing from)**



COMMENTS:

DATA PERIOD:

**Start Date: 5/1/2012 - 00:00
End Date: 5/31/2012 - 23:00**

COMPANY NAME:

Malcolm Pirnie, Inc.

MODELER:

Karina E Correa

CALM WINDS:

0.81%

TOTAL COUNT:

720 hrs.

AVG. WIND SPEED:

4.37 m/s

DATE:

6/5/2012

PROJECT NO.:

06835001.W140



Attachment C

Tables

TABLE 1

May 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
5/23/2012	South, West and East	Low to high winds in the morning with wind speeds between 1 and 23 mph, and moderate to high winds in the afternoon with wind speeds between 11 and 33 mph. Winds were predominately out of the west and north west throughout the day.	46-48	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at downwind monitoring locations. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo 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 13 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$. The elevated dust concentrations for the day are attributed to off-site conditions.	No field modifications necessary

TABLE 2

May Daily Average Dust Monitoring Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

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 ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)
South		15	12	11	13	
West		18	14	16	17	
East		15	15	12	13	
North		11	13	12	15	15
North East		14	17	16	16	18
North West		12	14	12	13	15
Calavera		4	6	6	6	7
Arroyo West		15	17	17	18	16
Arroyo South		11	15	14	14	19
Arroyo North		13	16	15	16	18
Week ending May 12th						
Date	Monday, May 07, 2012	Tuesday, May 08, 2012	Wednesday, May 09, 2012	Thursday, May 10, 2012	Friday, May 11, 2012	Saturday, May 12, 2012
Location	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)
South	26	21	18	19	20	
West	33	26	21	19	22	
East	26	18	16	18	18	
North	25	19	16	18	18	10
North East	29	18	16	17	21	15
North West	24	26	19	22	18	11
Calavera	12	10	8	8	13	6
Arroyo West	29	23	22	20	24	16
Arroyo South	26	17	16	16	17	10
Arroyo North	30	35	18	17	19	12
Week ending May 19th						
Date	Monday, May 14, 2012	Tuesday, May 15, 2012	Wednesday, May 16, 2012	Thursday, May 17, 2012	Friday, May 18, 2012	Saturday, May 19, 2012
Location	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)
South	7	9	16	21	17	
West	7	9	17	23	19	
East	6	9	14	21	21	
North	8	8	ND	ND	ND	ND
North East	7	8	13	21	24	13
North West	8	9	14	21	22	13
Calavera	4	4	7	11	10	6
Arroyo West	10	12	18	22	24	16
Arroyo South	Malfunction	6	11	16	16	10
Arroyo North	9	9	15	21	25	15
Week ending May 26th						
Date	Monday, May 21, 2012	Tuesday, May 22, 2012	Wednesday, May 23, 2012	Thursday, May 24, 2012	Friday, May 25, 2012	Saturday, May 26, 2012
Location	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)
South	21	27	47	33	25	
West	24	28	46	32	25	
East	18	22	48	32	22	
North	ND	ND	ND	ND	ND	
North East	21	23	40	33	24	
North West	24	25	36	27	23	
Calavera	11	12	16	13	12	
Arroyo West	23	27	34	28	24	
Arroyo South	17	17	25	19	20	
Arroyo North	24	25	36	30	27	
Week ending June 2nd						
Date	Monday, May 28, 2012	Tuesday, May 29, 2012	Wednesday, May 30, 2012	Thursday, May 31, 2012	Friday, June 01, 2012	Saturday, June 02, 2012
Location	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)	Average Reading ($\mu\text{g}/\text{m}^3$)
South		31	15	26		
West		36	21	27		
East		17	12	22		
North		ND	ND	ND		
North East		18	12	22		
North West		18	11	28		
Calavera		8	5	12		
Arroyo West		20	13	24		
Arroyo South		20	8	17		
Arroyo North		13	12	27		

NOTES:

1. Readings indicate PM_{10} 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
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.
5/23/2012	South	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at downwind monitoring locations. 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
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.
9/23/2011	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.
11/2/2011	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	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.
2/7/2012	West	Demolition activities were conducted northeast, and within 100 feet of the West Monitor. Dust suppression was implemented, and visible dust was not observed to be migrating towards the monitor. A background dust evaluation was conducted on the elevated data and 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 $\mu\text{g}/\text{m}^3$.
2/8/2012	West	Demolition activities were conducted southeast, and within 100 feet, of the West Monitor. Dust suppression was implemented, and visible dust was not observed to be migrating towards the monitor. A background dust evaluation was conducted on the elevated data and resulted in the actual dust generated on site to be 28 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$.
2/28/2012	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.
3/6/2012	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.
3/7/2012	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.
3/9/2012	West	Demolition activities were conducted within 100 ft of the West monitor. Visible dust was generated from the work activities and dust suppression was implemented. Exhaust from the heavy equipment also contributed to the elevated reading. Corrective actions were taken to increase dust suppression for these demolition activities.
3/12/2012	West	Demolition activities were conducted within 200 ft of the West monitor. Dust suppression was implemented and no visible dust was observed to be migrating towards the monitor. Exhaust from the heavy equipment in the area was migrating towards the monitor and contributed to the elevated reading. A background dust evaluation was conducted on the elevated data and resulted in the actual dust generated on site to be 28 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$.
5/23/2012	West	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at downwind monitoring locations. 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
North West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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 $\mu\text{g}/\text{m}^3$ for the North West monitor. Accounting for background dust concentration places site generated dust below the sentinel value.
4/14/2012	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.

Dust Monitor Summary
North Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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 $\mu\text{g}/\text{m}^3$ 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 $\mu\text{g}/\text{m}^3$ 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 $\mu\text{g}/\text{m}^3$ 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
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 µg/m ³ 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.
4/14/2012	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.
4/26/2012	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 Hazardous Weather Outlook for the afternoon. 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
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 $\mu\text{g}/\text{m}^3$ 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 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$.
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.
4/2/2012	East	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 $\mu\text{g}/\text{m}^3$.
5/23/2012	East	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at downwind monitoring locations. 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
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 µg/m ³ which is below the site-specific sentinel value of 43 µg/m ³ .
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

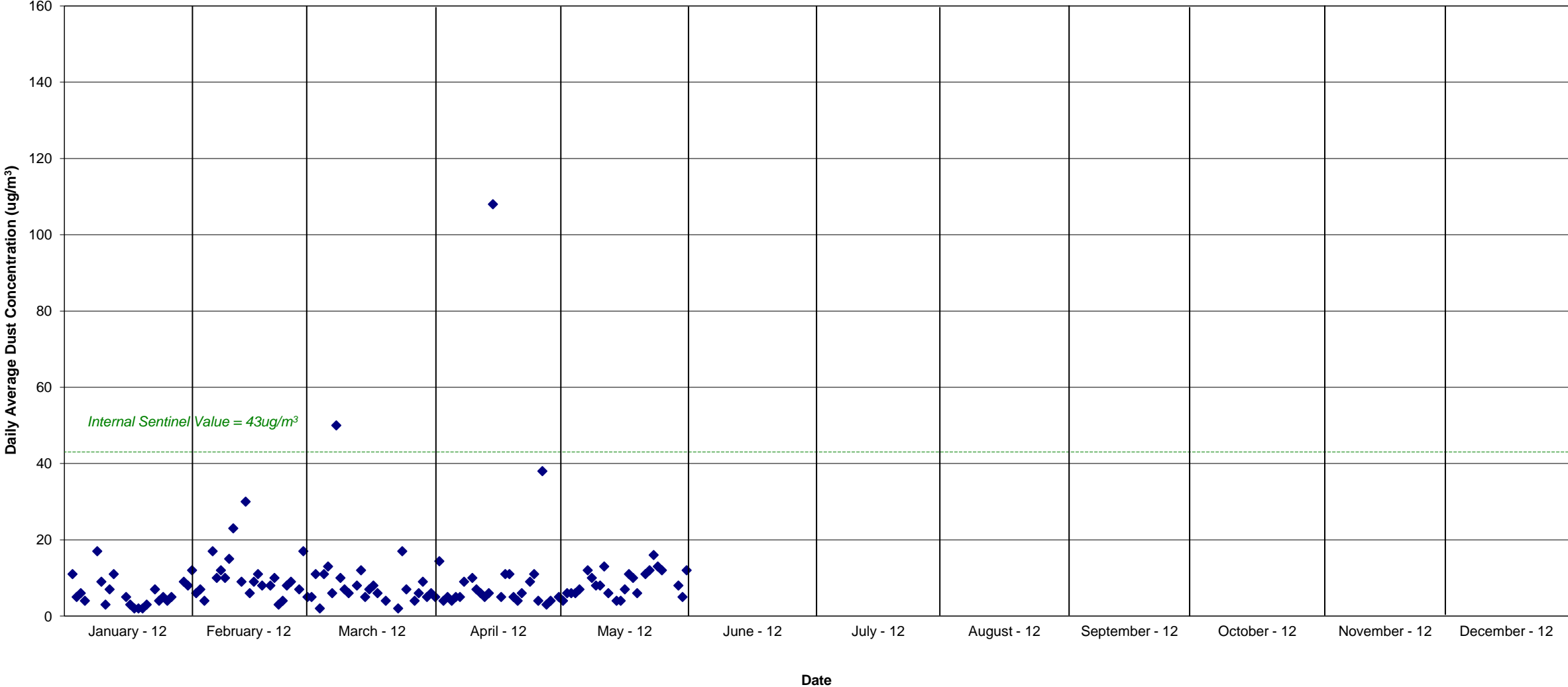
Date	Location	Comments
4/14/2012	Arroyo North	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind 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.



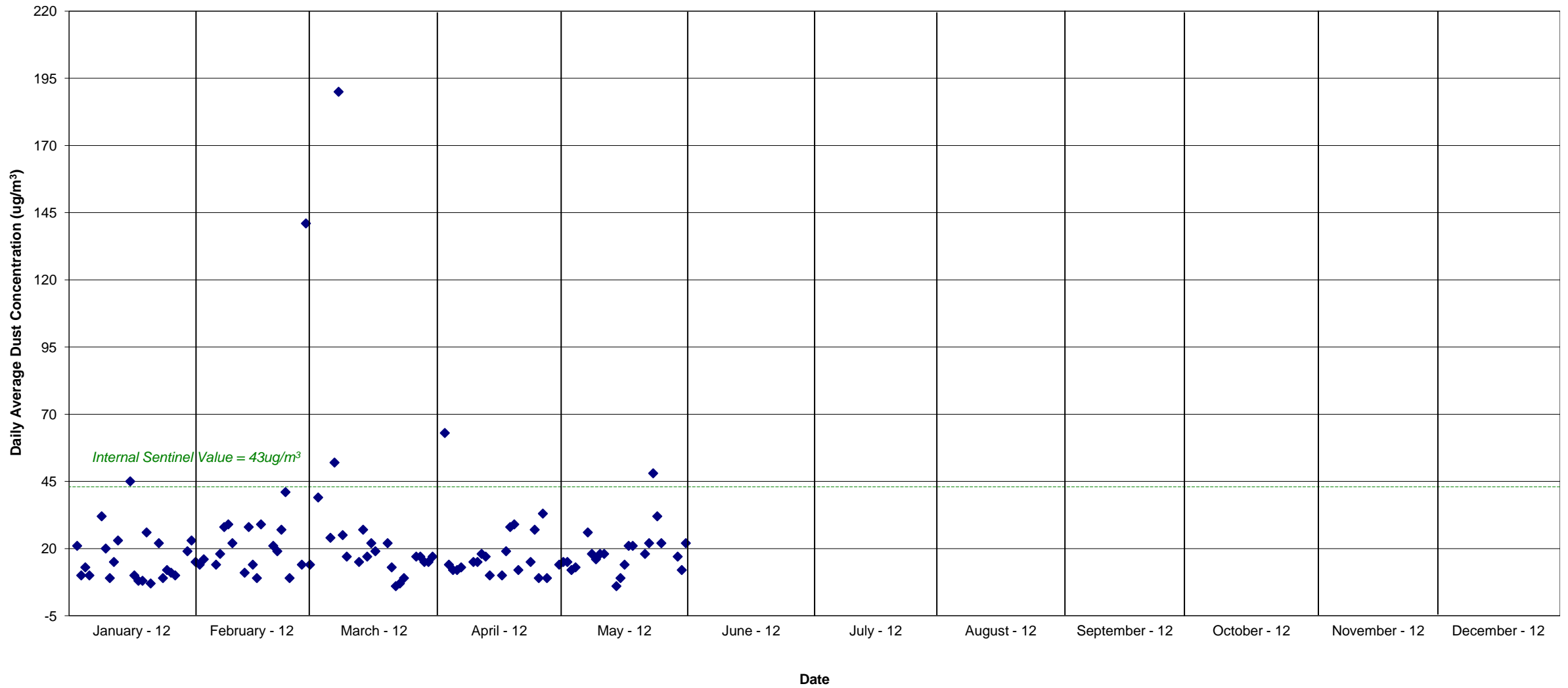
Attachment D

Dust Concentration Graphs

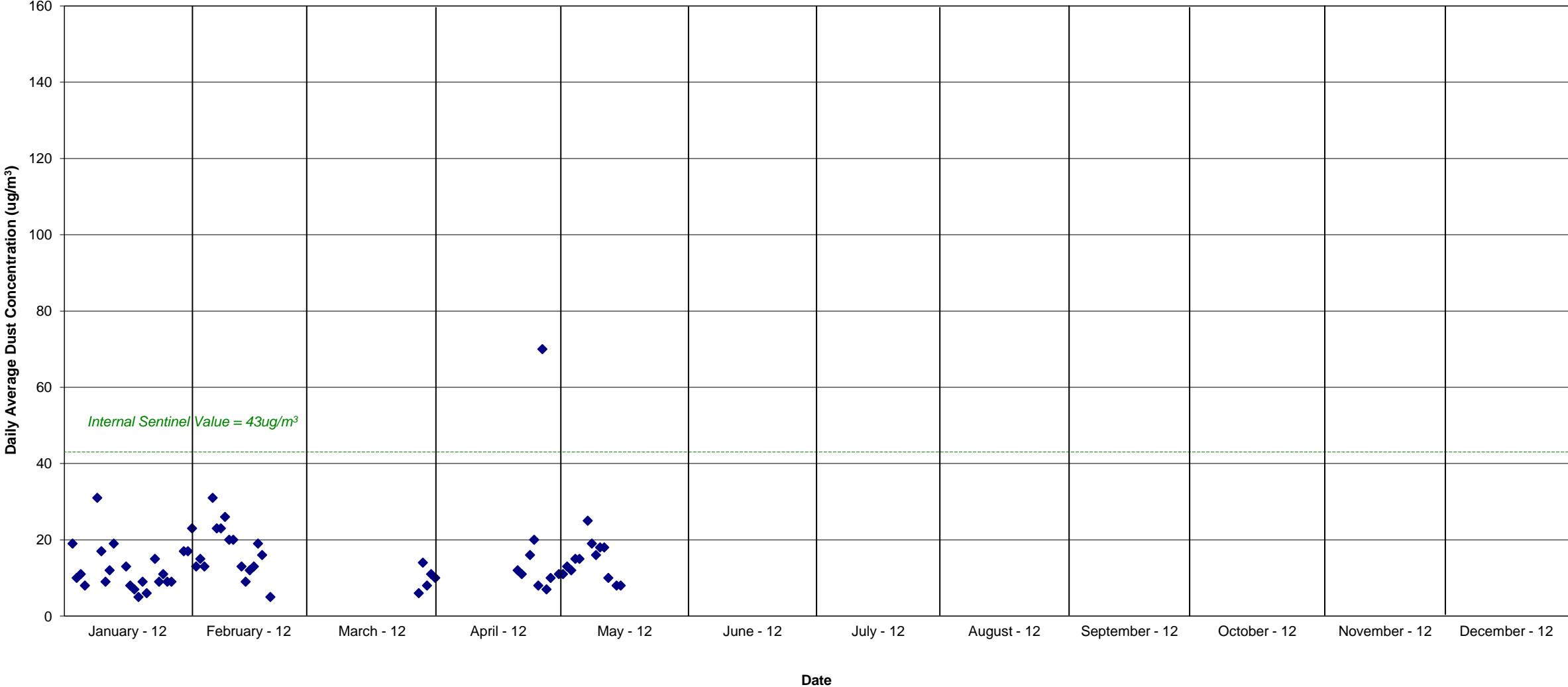
2012 Dust Monitor Summary
Calavera Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



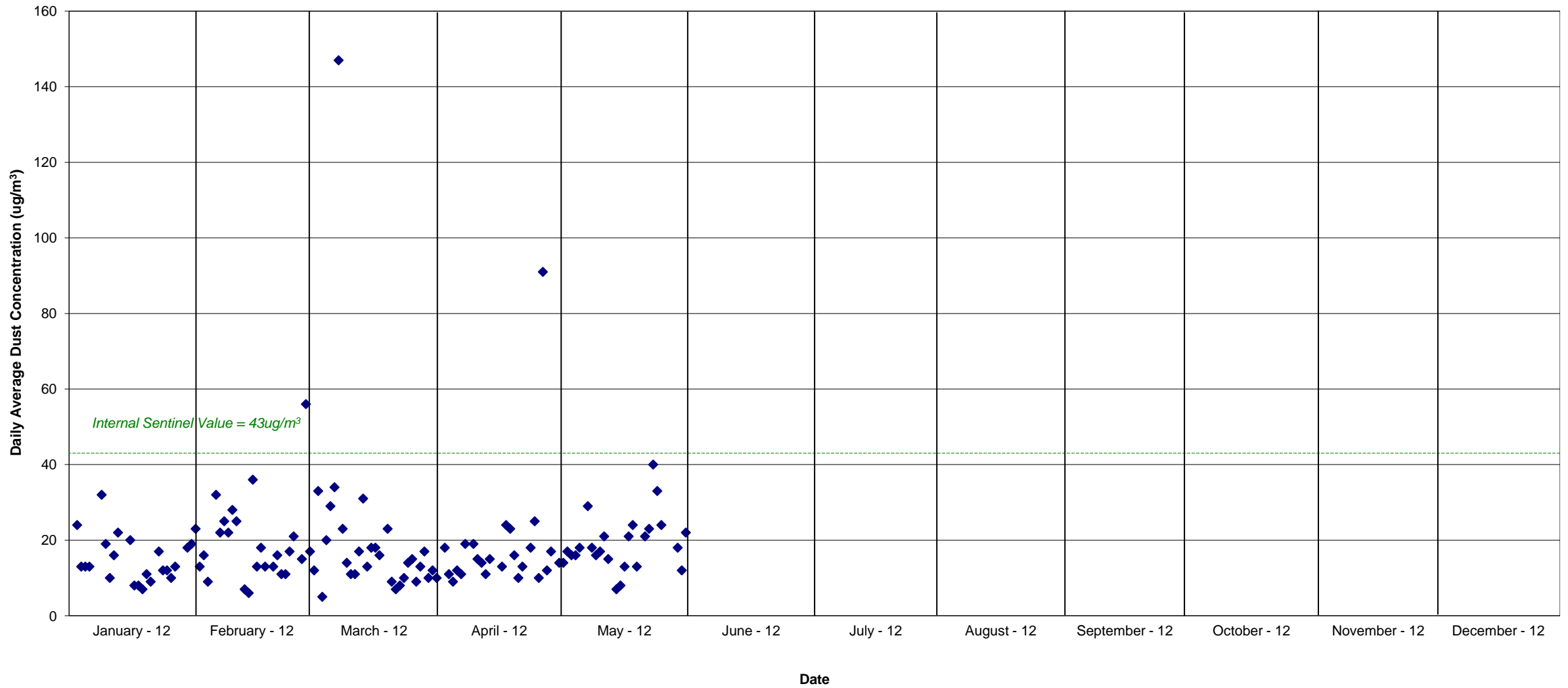
2012 Dust Monitor Summary
East Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



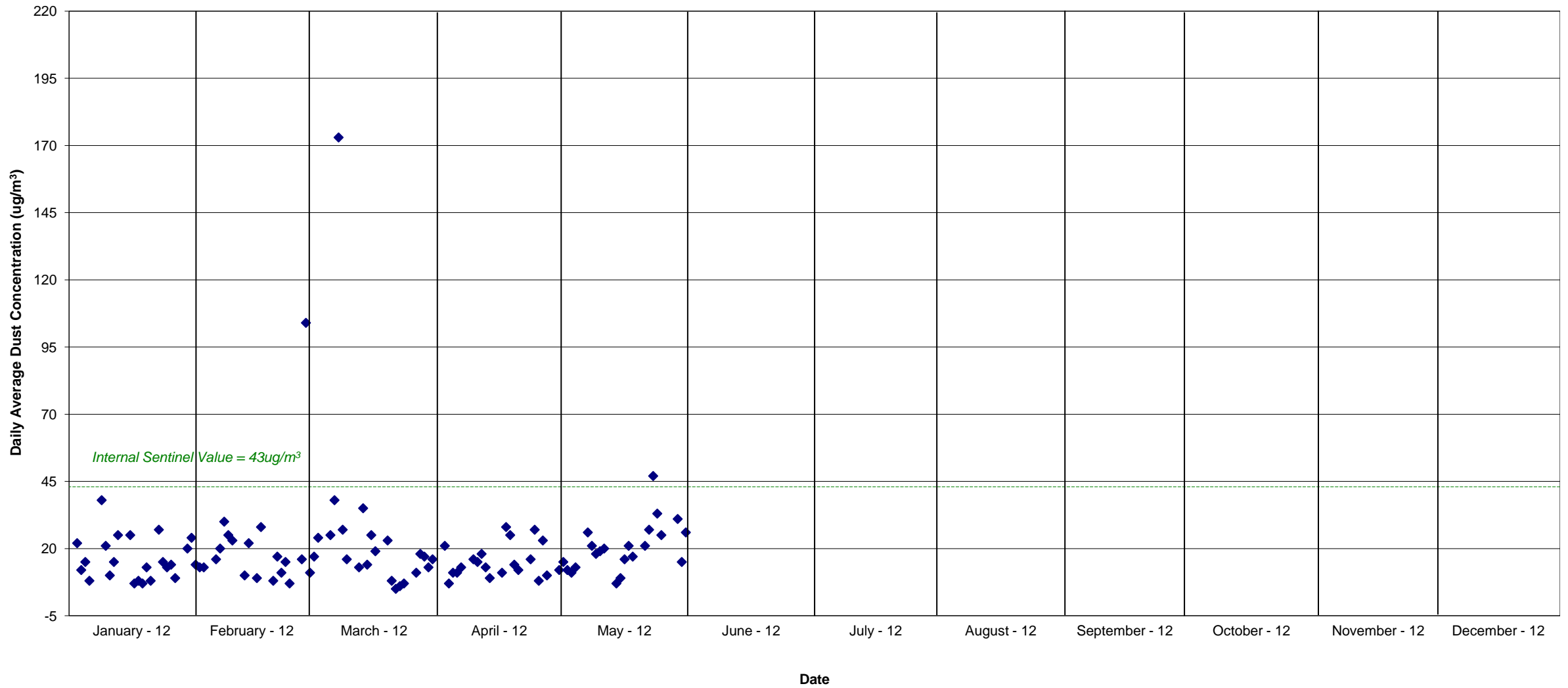
2012 Dust Monitor Summary
North Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



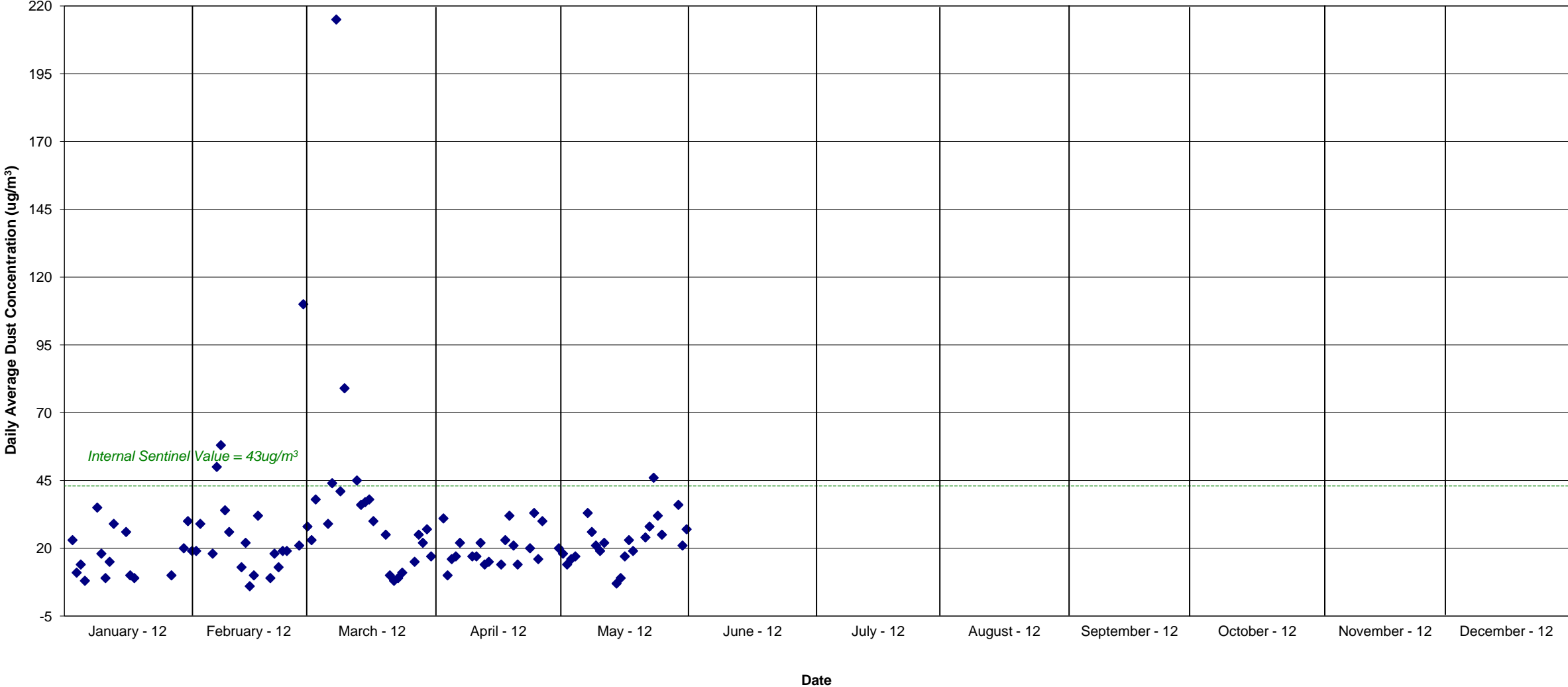
2012 Dust Monitor Summary
North East Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



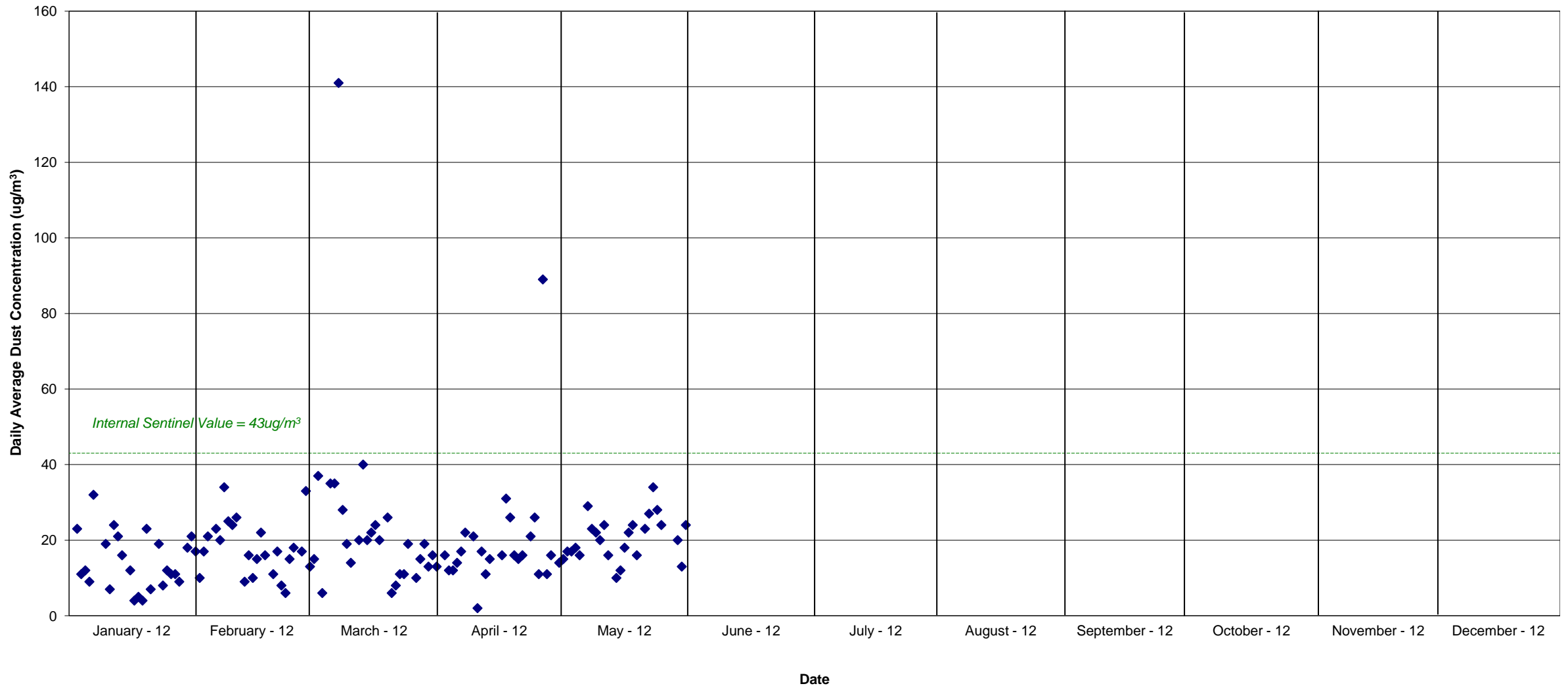
2012 Dust Monitor Summary
South Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



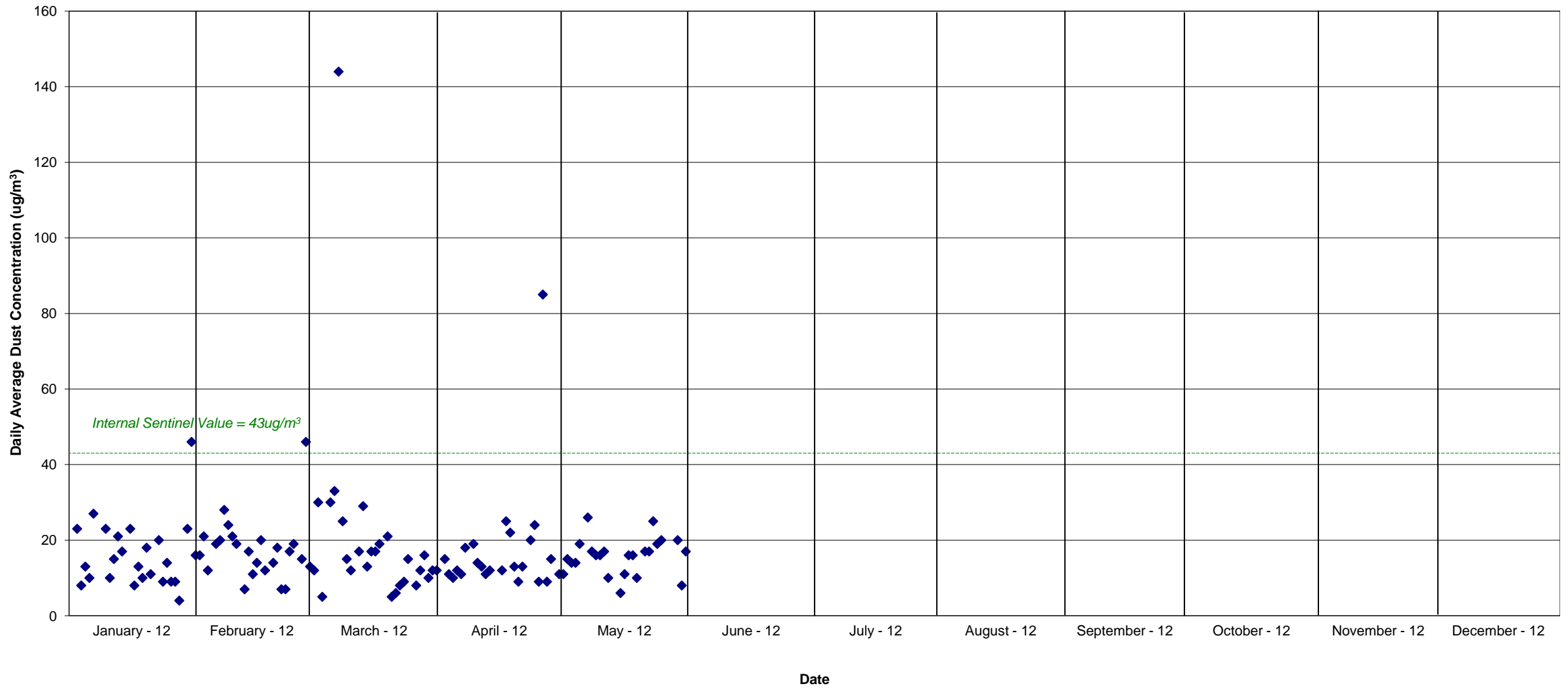
2012 Dust Monitor Summary
West Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



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

