

July 25, 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: June 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 June 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 the manufacturer (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 until June 12th. Accordingly, as presented in Attachment C, Table 2, the readings for MP-6 are represented by 'ND' for 'not deployed' from June 1st to June 12th.





A summary of the June elevated dust data is provided in Attachment C, Table 1, and the June 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 June with the exception of the following:

June 2nd – The daily average dust concentration for the Arroyo West and Arroyo North monitors was greater than the sentinel value.

Windy conditions with wind gusts up to 17 mph were present in the El Paso causing elevated dust concentrations at downwind monitoring locations. Elevated dust concentrations were present throughout the day. A background dust evaluation was conducted on the elevated data using the upwind (East) monitor location. The prevailing wind direction that day was from the southeast. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West (downwind) location resulted in the actual dust generated on site to be $6 \mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of $43 \mu\text{g}/\text{m}^3$.

June 15th – The daily average dust concentration for the East, North East, Arroyo South, Arroyo West and Arroyo North monitors was greater than the sentinel value.

Wind gust speeds up to 66 mph were present in the El Paso area causing elevated dust concentrations at downwind monitoring locations. The prevailing wind direction that day was from the northwest with elevated dust concentrations present throughout the day. A background dust evaluation was conducted on the elevated data using the upwind (North 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 $17 \mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of $43 \mu\text{g}/\text{m}^3$.

June 29th – The daily average dust concentration for the North West monitor was greater than the sentinel value.

Wind gust speeds up to 37 mph were present in the El Paso area. The prevailing wind direction that day was from the south with elevated dust concentrations present throughout the day. A background dust evaluation was conducted on the elevated data using the upwind (South) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North West (downwind) location resulted in the actual dust generated on site to be $21 \mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of $43 \mu\text{g}/\text{m}^3$.





Mr. Roberto Puga, P.G.
Texas Custodial Trust
July 25, 2012

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Very truly yours,

MALCOLM PIRNIE, INC.

A handwritten signature in black ink 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'

**MALCOLM
PIRNIE**

211 N. Florence St.
Suite 202
El Paso, TX 79901

Texas Custodial Trust
El Paso Smelter Site
Air Monitoring Plan

EXISTING AIR MONITORING NETWORK

MAY 2012

FIGURE 1



Attachment B

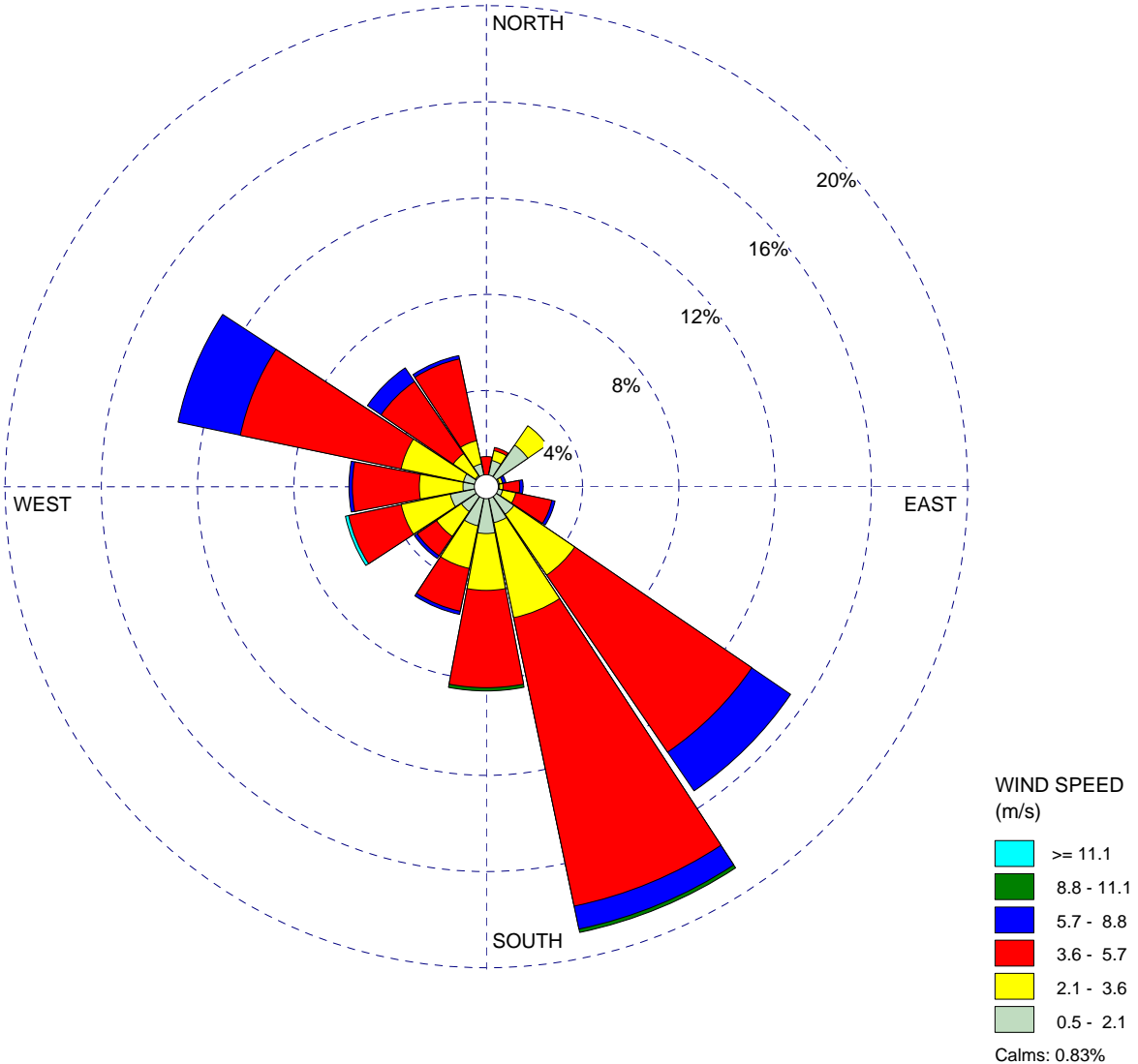
Wind Rose Plots

WIND ROSE PLOT:

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

DISPLAY:

**Wind Speed
Direction (blowing from)**



COMMENTS:

DATA PERIOD:

**Start Date: 6/1/2012 - 00:00
End Date: 6/30/2012 - 23:00**

COMPANY NAME:

Malcolm Pirnie, Inc.

MODELER:

Karina E Correa

CALM WINDS:

0.83%

TOTAL COUNT:

720 hrs.

AVG. WIND SPEED:

3.68 m/s

DATE:

7/5/2012

PROJECT NO.:

06835001.W140



Attachment C

Tables

TABLE 1

June 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	Value ($\mu\text{g}/\text{m}^3$)	Comments	Action
6/2/2012	Arroyo West & Arroyo North	47	Windy conditions with wind gusts up to 17 mph were present in the El Paso area from late afternoon and into the evening causing elevated dust concentrations at downwind monitoring locations. A background dust evaluation was conducted on the elevated data using the upwind (East) monitor location. The prevailing wind direction that day was from the southeast. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West (downwind) location resulted in the actual dust generated on site to be 6 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$.	No field modifications necessary
6/15/2012	East, North East, Arroyo South, Arroyo West and Arroyo North	45-60	Wind gust speeds up to 66 mph were present in the El Paso area from the early afternoon hours until the evening hours causing elevated dust concentrations at downwind monitoring locations. The prevailing wind direction that day was from the northwest. A background dust evaluation was conducted on the elevated data using the upwind (North 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 17 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$.	No field modifications necessary
6/29/2012	North West	50	Wind gust speeds up to 37 mph were present in the El Paso area in the evening. The prevailing wind direction that day was from the south. A background dust evaluation was conducted on the elevated data using the upwind (South) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North West (downwind) location resulted in the actual dust generated on site to be 21 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$.	No field modifications necessary

TABLE 2

June Daily Average Dust Monitoring Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Week ending May 5th						
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					35	
West					38	
East					37	41
North					ND	ND
North East					36	42
North West					37	43
Calavera					20	24
Arroyo West					38	47
Arroyo South					30	37
Arroyo North					40	47
Week ending May 12th						
Date	Monday, June 04, 2012	Tuesday, June 05, 2012	Wednesday, June 06, 2012	Thursday, June 07, 2012	Friday, June 08, 2012	Saturday, June 09, 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	23	19	10	12	17	
West	25	22	14	13	16	
East	22	18	13	17	17	27
North	ND	ND	ND	ND	ND	ND
North East	23	20	15	19	23	22
North West	20	19	14	14	17	19
Calavera	11	9	5	6	7	8
Arroyo West	23	22	16	16	24	24
Arroyo South	17	15	9	11	12	14
Arroyo North	24	20	14	16	18	21
Week ending May 19th						
Date	Monday, June 11, 2012	Tuesday, June 12, 2012	Wednesday, June 13, 2012	Thursday, June 14, 2012	Friday, June 15, 2012	Saturday, June 16, 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	16	20	24	26	29	
West	19	26	27	23	38	
East	20	25	27	20	60	11
North	ND	ND	25	17	39	10
North East	22	26	30	21	62	ND
North West	20	25	27	20	43	13
Calavera	7	11	13	9	15	5
Arroyo West	22	29	32	24	50	16
Arroyo South	15	22	29	29	47	14
Arroyo North	21	28	32	22	45	13
Week ending May 26th						
Date	Monday, June 18, 2012	Tuesday, June 19, 2012	Wednesday, June 20, 2012	Thursday, June 21, 2012	Friday, June 22, 2012	Saturday, June 23, 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	17	17	18	24	13	
West	22	39	24	31	13	
East	15	16	19	30	30	13
North	13	12	14	18	18	13
North East	19	20	18	25	25	15
North West	16	ND	20	28	28	14
Calavera	7	7	8	11	11	6
Arroyo West	17	16	18	26	26	17
Arroyo South	ND	17	19	26	26	16
Arroyo North	17	17	18	27	27	16
Week ending June 2nd						
Date	Monday, June 25, 2012	Tuesday, June 26, 2012	Wednesday, June 27, 2012	Thursday, June 28, 2012	Friday, June 29, 2012	Saturday, June 30, 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	19	17	25	36	29	
West	18	23	28	36	31	
East	16	17	23	34	29	21
North	16	15	20	30	26	19
North East	19	18	24	36	41	25
North West	19	18	24	35	50	22
Calavera	9	8	12	18	18	11
Arroyo West	24	24	27	40	43	23
Arroyo South	24	19	27	40	39	27
Arroyo North	19	17	25	39	41	25

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
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 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
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 µg/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 µg/m ³ which is below the site-specific sentinel value of 43 µg/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 µg/m ³ which is below the site-specific sentinel value of 43 µg/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 µg/m ³ which is below the site-specific sentinel value of 43 µg/m ³ .
5/23/2012	West	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations 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
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.
6/29/2012	North West	Wind gust speeds up to 37 mph were present in the El Paso area in the evening. The prevailing wind direction that day was from the south. A background dust evaluation was conducted on the elevated data using the upwind (South) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North West (downwind) location resulted in the actual dust generated on site to be 21 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$.

Dust Monitor Summary
North Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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
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/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.
6/15/2012	North East	Wind gust speeds up to 66 mph were present in the El Paso area from the early afternoon hours until the evening hours causing elevated dust concentrations at downwind monitoring locations. The prevailing wind direction that day was from the northwest. A background dust evaluation was conducted on the elevated data using the upwind (North 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 17 µg/m ³ which is below the site-specific sentinel value of 43 µg/m ³ .

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 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
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
6/15/2012	East	Wind gust speeds up to 66 mph were present in the El Paso area from the early afternoon hours until the evening hours causing elevated dust concentrations at downwind monitoring locations. The prevailing wind direction that day was from the northwest. A background dust evaluation was conducted on the elevated data using the upwind (North 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 17 µg/m ³ which is below the site-specific sentinel value of 43 µg/m ³ .

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 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 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$.
2/28/2012	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.
6/15/2012	Arroyo South	Wind gust speeds up to 66 mph were present in the El Paso area from the early afternoon hours until the evening hours causing elevated dust concentrations at downwind monitoring locations. The prevailing wind direction that day was from the northwest. A background dust evaluation was conducted on the elevated data using the upwind (North 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 17 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$.

Dust Monitor Summary
Malcolm Pirnie 3 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.
6/2/2012	Arroyo North	Windy conditions with wind gusts up to 17 mph were present in the El Paso area from late afternoon and into the evening causing elevated dust concentrations at downwind monitoring locations. A background dust evaluation was conducted on the elevated data using the upwind (East) monitor location. The prevailing wind direction that day was from the southeast. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West (downwind) location resulted in the actual dust generated on site to be 6 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$.
6/15/2012	Arroyo North	Wind gust speeds up to 66 mph were present in the El Paso area from the early afternoon hours until the evening hours causing elevated dust concentrations at downwind monitoring locations. The prevailing wind direction that day was from the northwest. A background dust evaluation was conducted on the elevated data using the upwind (North 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 17 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$.

Dust Monitor Summary
Arroyo West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

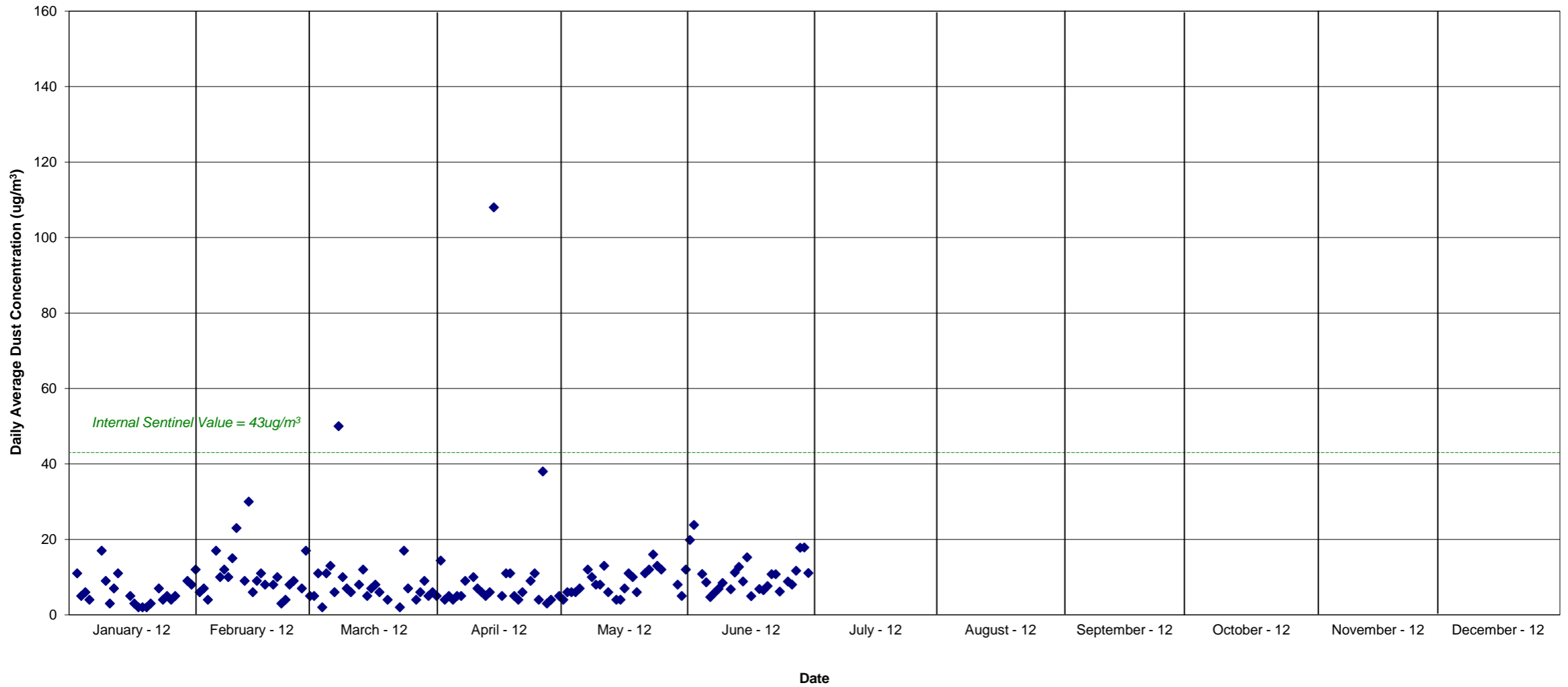
Date	Location	Comments
11/30/2011	Arroyo West	The surrounding atmosphere was hazy throughout the day. Monitor stations upwind of site activities and monitors with no demolition activities in their proximity recorded elevated data. The elevated readings are attributed to off-site conditions.
4/14/2012	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.
6/2/2012	Arroyo West	Windy conditions with wind gusts up to 17 mph were present in the El Paso area from late afternoon and into the evening causing elevated dust concentrations at downwind monitoring locations. A background dust evaluation was conducted on the elevated data using the upwind (East) monitor location. The prevailing wind direction that day was from the southeast. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West (downwind) location resulted in the actual dust generated on site to be 6 µg/m ³ which is below the site-specific sentinel value of 43 µg/m ³ .
6/15/2012	Arroyo West	Wind gust speeds up to 66 mph were present in the El Paso area from the early afternoon hours until the evening hours causing elevated dust concentrations at downwind monitoring locations. The prevailing wind direction that day was from the northwest. A background dust evaluation was conducted on the elevated data using the upwind (North 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 17 µg/m ³ which is below the site-specific sentinel value of 43 µg/m ³ .



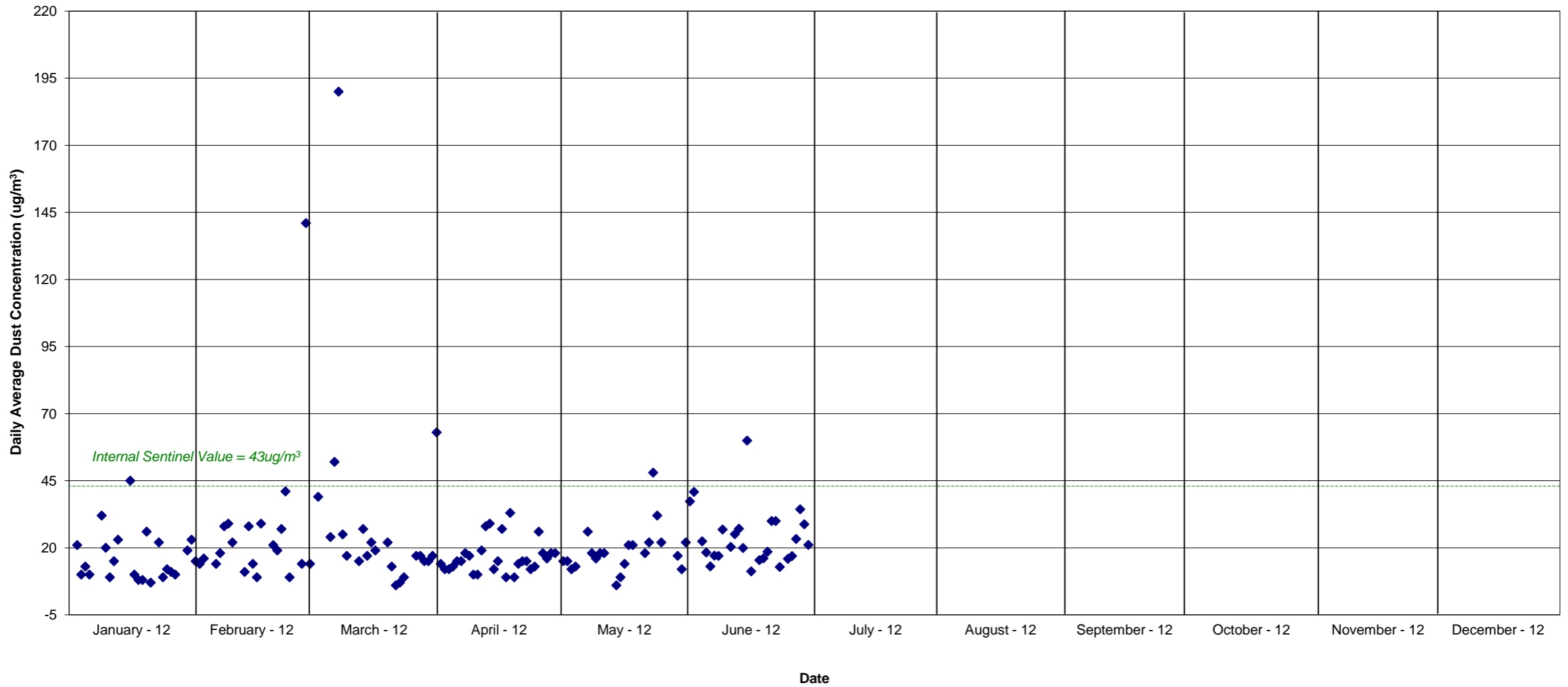
Attachment D

Dust Concentration Graphs

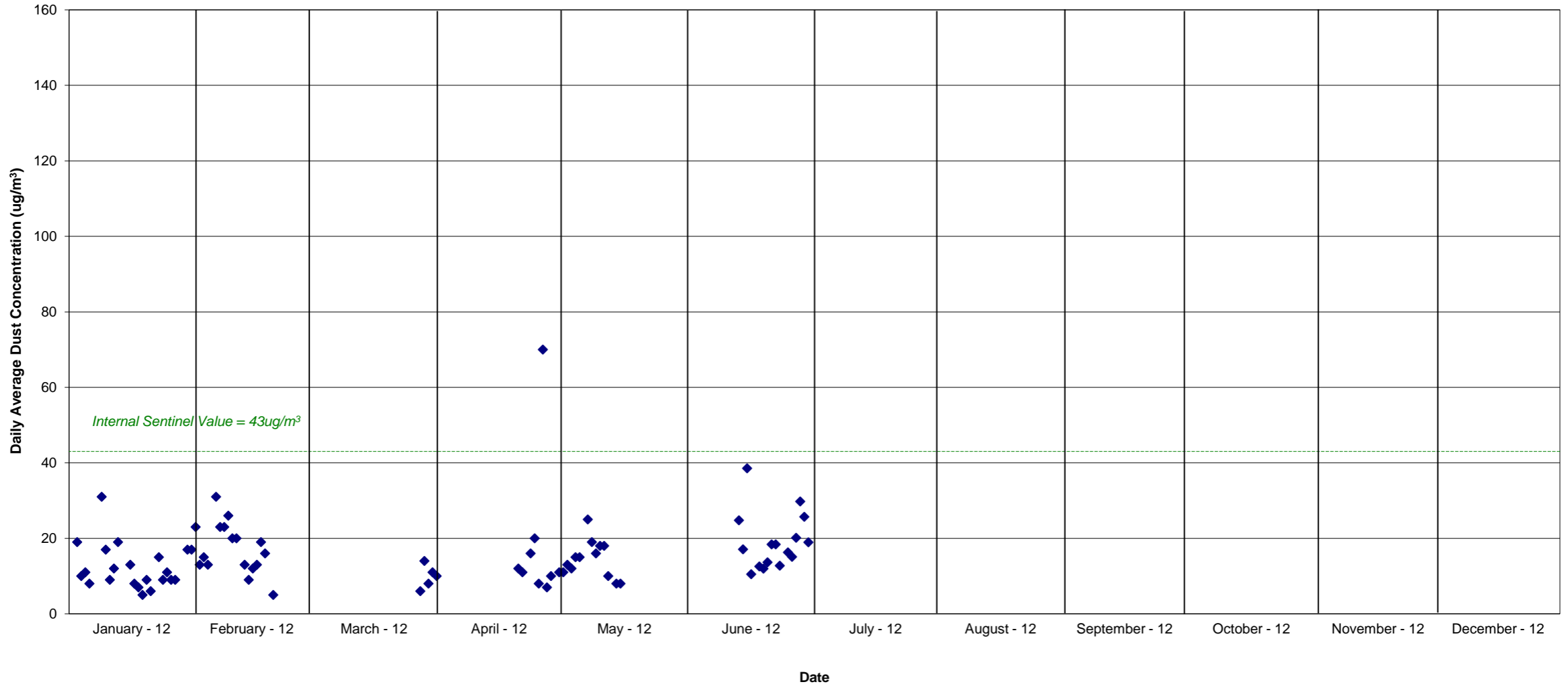
2012 Dust Monitor Summary
Calavera Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



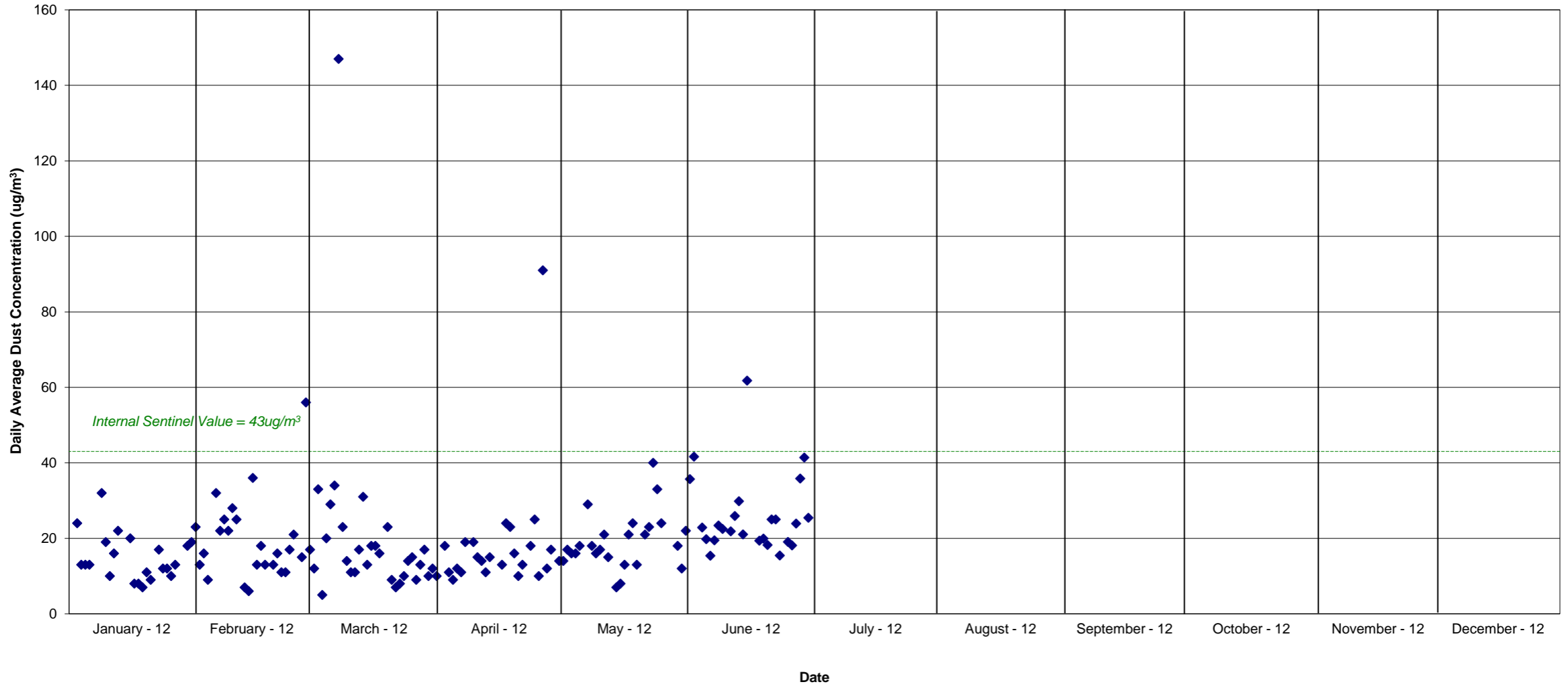
2012 Dust Monitor Summary
East Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



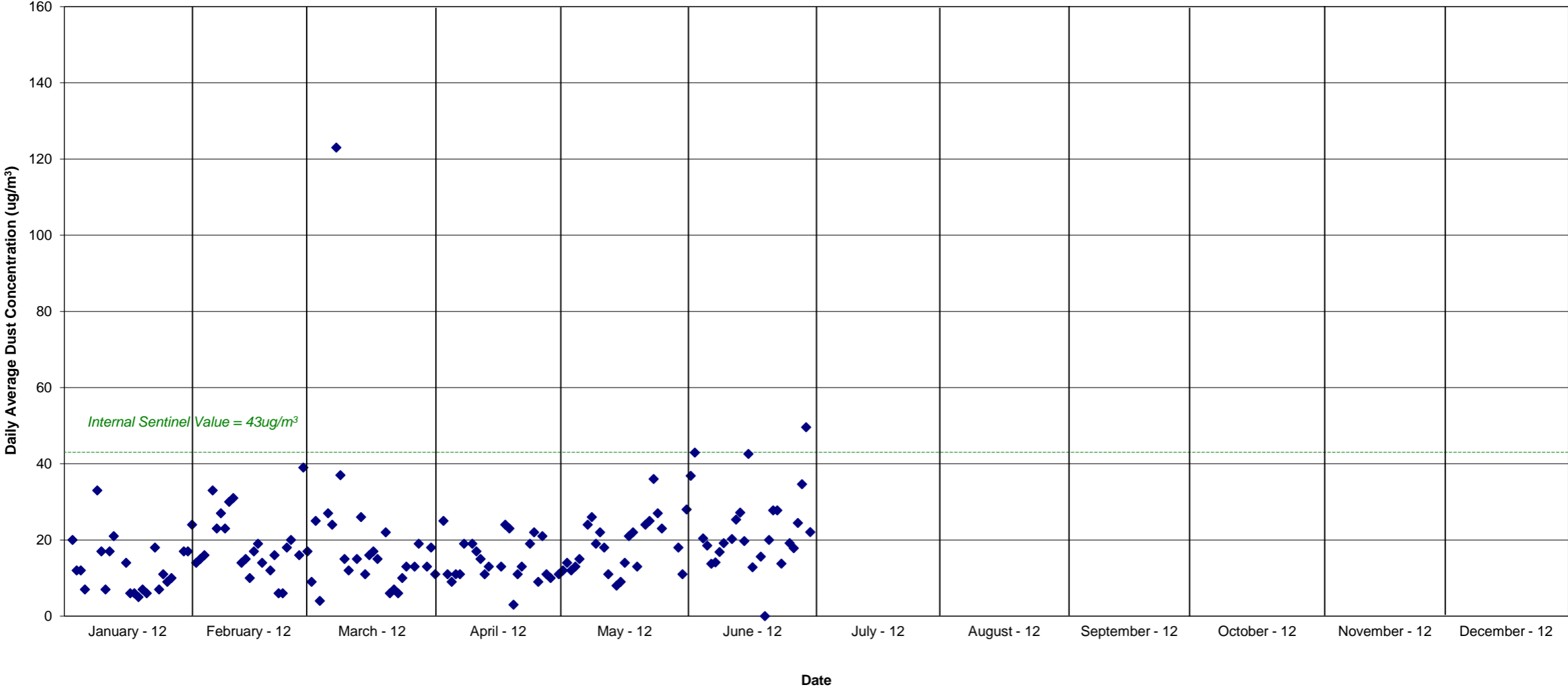
2012 Dust Monitor Summary
North Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



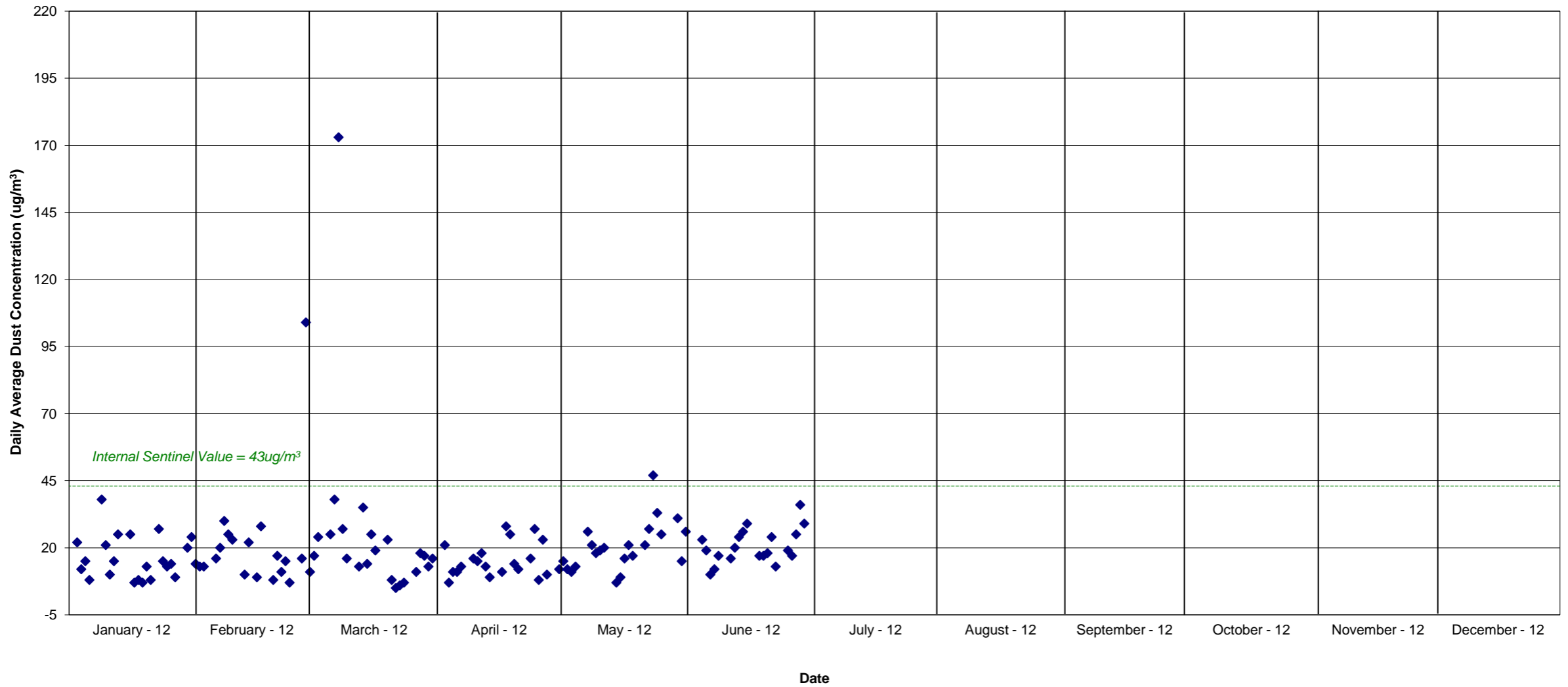
2012 Dust Monitor Summary
North East Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



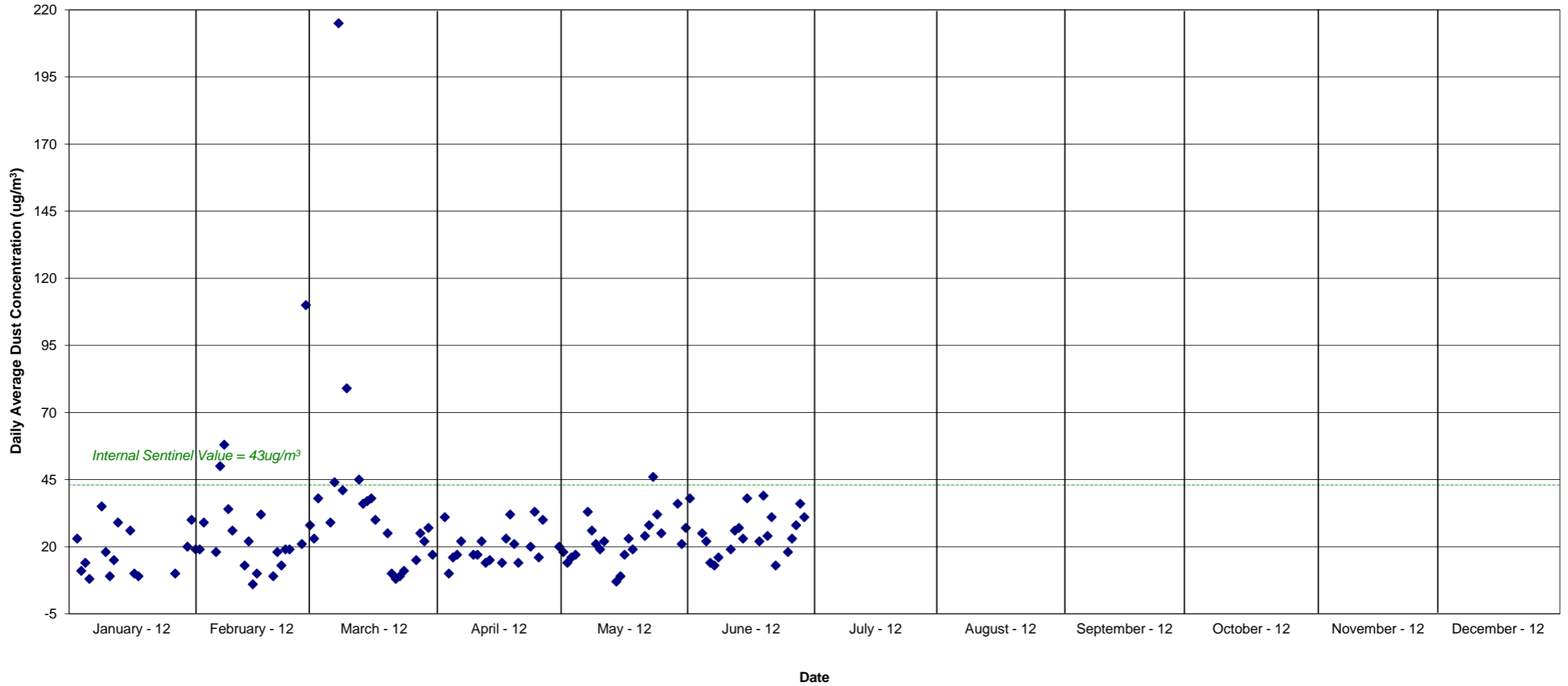
2012 Dust Monitor Summary
North West Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



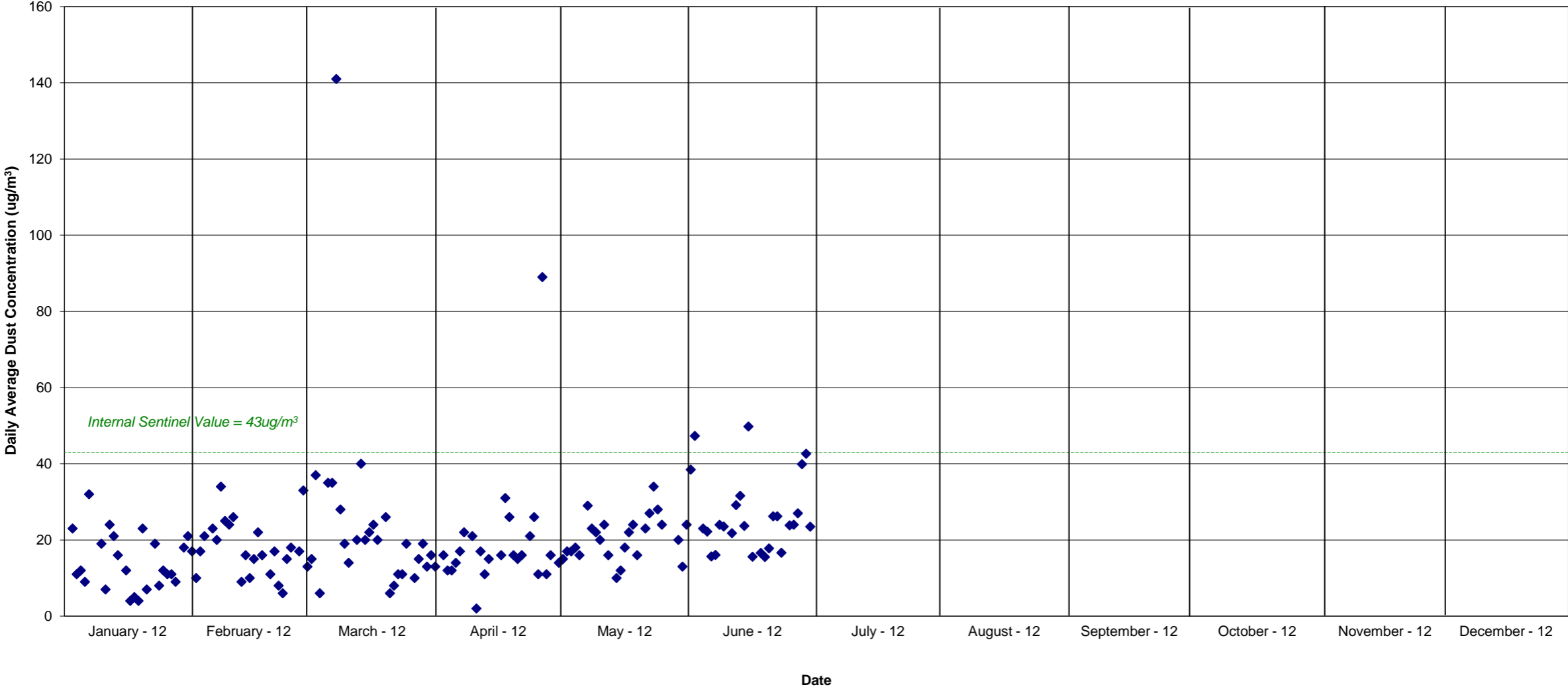
2012 Dust Monitor Summary
South Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



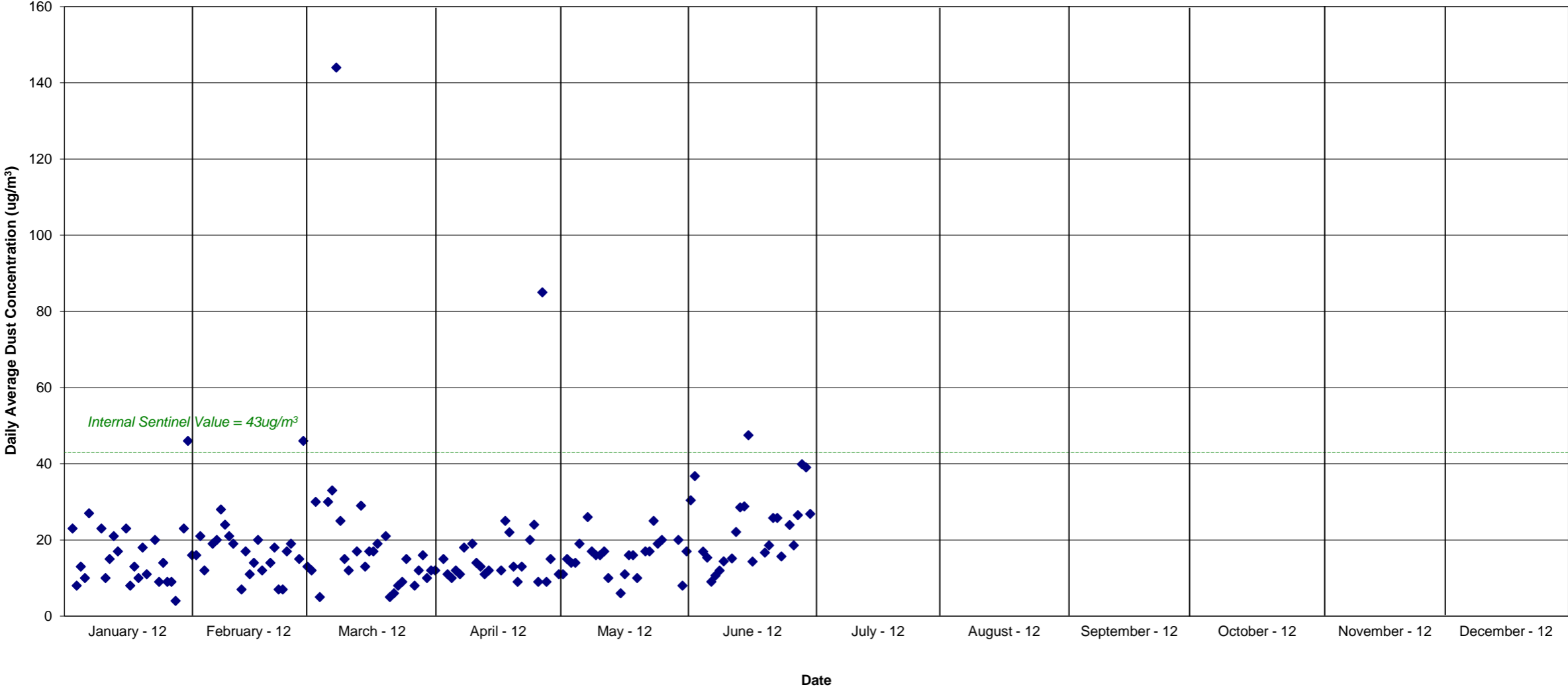
2012 Dust Monitor Summary
West Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



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

