

October 10, 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: September 2012 Dust Monitoring Summary

Dear Mr. Puga:

Malcolm Pirnie, Inc. (Malcolm Pirnie) performed dust monitoring activities at the Former ASARCO Smelter site in El Paso, Texas during the month of September 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-4 monitor which is positioned in the Calavera location (Attachment A, Figure 1) was transmitting a flow error on September 3<sup>rd</sup> through September 11<sup>th</sup> and was sent back to the manufacturer, TSI, for repairs. The MP-6 monitor, which is positioned in the North location, was deployed to the Calavera location replacing the MP-4 monitor where it remained until September 26<sup>th</sup>, while the MP-4 monitor was being repaired. The MP-6 monitor was chosen as a back-up monitor because the North Location is considered as a redundant monitoring location. The MP-5 monitor which is positioned in the Northeast location was relocated to a position further North to better capture the construction activities nearby. Accordingly, as presented in Attachment C,





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Table 2, readings for MP-4 (Calavera) and MP-6 (North) are represented by 'ND' for 'not deployed' for the dates the monitors were not functioning properly and relocation of MP-6 monitor. Figure 1 was modified to show the current position relocated MP-5 monitor. Figure 1 was not modified to show the temporary location of the MP-6 monitor.

A summary of the September elevated dust data is provided in Attachment C, Table 1, and the September daily average dust concentration data is provided in Attachment C, Table 2. Days where no construction activities were present are colored grey in Attachment C, Table 2. Also provided in Attachment C is the rolling 12-month dust observation summaries organized by location.

For the month of September there were no exceedances. All days in September were below the site-specific sentinel value of  $43 \mu\text{g}/\text{m}^3$ . A summary of the September elevated dust data is provided in Attachment C, Table 1, and the September 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.

Very truly yours,

MALCOLM PIRNIE, INC.

Alicia Fogg, PE  
Project Engineer

Project 6835001

Attachments

cc: Former ASARCO Smelter Project Team





**Attachment A**

Figure 1

Map Document: (S:\GIS\_Resources\Standards\_Guidelines\MapTemplates\GIS\_TEMPLATES\_2005\11x17\_Landscape.mxd) 7/19/2005 - 5:27:24 PM



**Legend**

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

N

0 500 1,000  
Feet

SCALE 1"=500'



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

Texas Custodial Trust  
El Paso Smelter Site  
Air Monitoring Plan

EXISTING AIR MONITORING NETWORK

SEPTEMBER 2012	FIGURE 1
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**Attachment B**

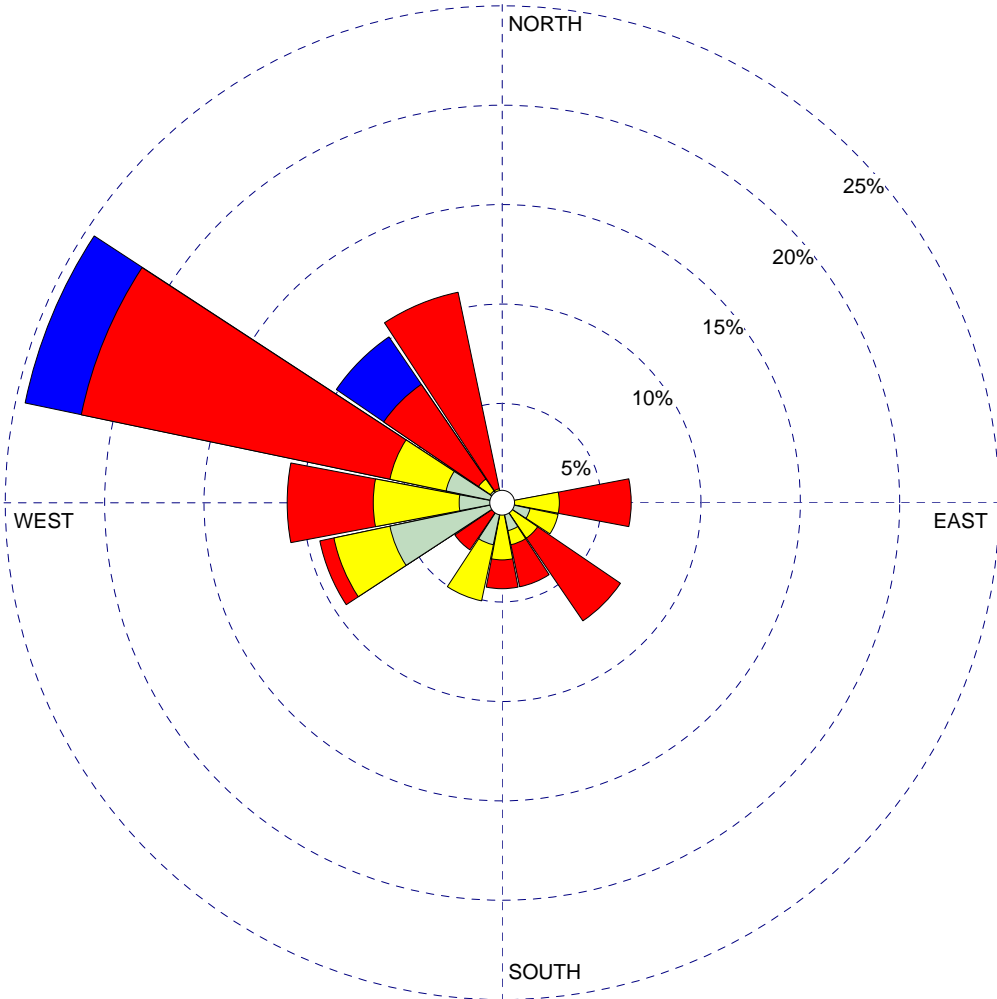
Wind Rose Plots

WIND ROSE PLOT:

**Former ASARCO El Paso Smelter Remediation Site  
September 2012 Wind Rose Plot**

DISPLAY:

**Wind Speed  
Direction (blowing from)**



WIND SPEED  
(m/s)

- >= 11.1
- 8.8 - 11.1
- 5.7 - 8.8
- 3.6 - 5.7
- 2.1 - 3.6
- 0.5 - 2.1

Calms: 0.41%

COMMENTS:

DATA PERIOD:

**Start Date: 9/1/2012 - 00:00  
End Date: 9/12/2012 - 00:00**

COMPANY NAME:

**Malcolm Pirnie, Inc**

MODELER:

**Karina E Correa**

CALM WINDS:

**0.41%**

TOTAL COUNT:

**139 hrs.**

AVG. WIND SPEED:

**3.57 m/s**

DATE:

**10/4/2012**

PROJECT NO.:

**06835001.W140**



**Attachment C**

Tables

TABLE 1

September 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
N/A	N/A	N/A	For the month of September there were no exceedances. All days in September were below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$ .	No field modifications necessary.



TABLE 2

## September Daily Average Dust Monitoring Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

Week ending September 1st						
Date	Monday, August 27, 2012	Tuesday, August 28, 2012	Wednesday, August 29, 2012	Thursday, August 30, 2012	Friday, August 31, 2012	Saturday, September 01, 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
West						17
East						25
North						ND
North East						22
North West						25
Calavera						9
Arroyo West						26
Arroyo South						27
Arroyo North						23
Week ending September 8th						
Date	Monday, September 03, 2012	Tuesday, September 04, 2012	Wednesday, September 05, 2012	Thursday, September 06, 2012	Friday, September 07, 2012	Saturday, September 08, 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
West						11
East						19
North						ND
North East						20
North West						20
Calavera						ND
Arroyo West						18
Arroyo South						25
Arroyo North						25
Week ending September 15th						
Date	Monday, September 10, 2012	Tuesday, September 11, 2012	Wednesday, September 12, 2012	Thursday, September 13, 2012	Friday, September 14, 2012	Saturday, September 15, 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						19
East						34
North						ND
North East						34
North West						35
Calavera						20
Arroyo West						33
Arroyo South						42
Arroyo North						40
Week ending September 22nd						
Date	Monday, September 17, 2012	Tuesday, September 18, 2012	Wednesday, September 19, 2012	Thursday, September 20, 2012	Friday, September 21, 2012	Saturday, September 22, 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						29
West						17
East						28
North						ND
North East						26
North West						28
Calavera						13
Arroyo West						29
Arroyo South						33
Arroyo North						29
Week ending September 29th						
Date	Monday, September 24, 2012	Tuesday, September 25, 2012	Wednesday, September 26, 2012	Thursday, September 27, 2012	Friday, September 28, 2012	Saturday, September 29, 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						11
West						5
East						9
North						9
North East						8
North West						9
Calavera						4
Arroyo West						ND
Arroyo South						10
Arroyo North						10

**NOTES:**

1. Readings indicate  $\text{PM}_{10}$  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
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
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 <sup>3</sup> which is below the site-specific sentinel value of 43 µg/m <sup>3</sup> .
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 <sup>3</sup> which is below the site-specific sentinel value of 43 µg/m <sup>3</sup> .
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 <sup>3</sup> which is below the site-specific sentinel value of 43 µg/m <sup>3</sup> .
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
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 $\mu\text{g}/\text{m}^3$ .
8/13/2012	North West	Wind gust speeds up to 41 mph were present in the El Paso area in the evening. The prevailing wind direction that day was from the East. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo 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
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
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 <sup>3</sup> 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 <sup>3</sup> which is below the site-specific sentinel value of 43 µg/m <sup>3</sup> .

Dust Monitor Summary  
East Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

Date	Location	Comments
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 $\mu\text{g}/\text{m}^3$ .

Dust Monitor Summary  
East Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

Date	Location	Comments
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.
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 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$ .



Dust Monitor Summary  
Calavera Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

Date	Location	Comments
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 North Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

Date	Location	Comments
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 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$ .
6/15/2012	Arroyo 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 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$ .

Dust Monitor Summary  
Arroyo South Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

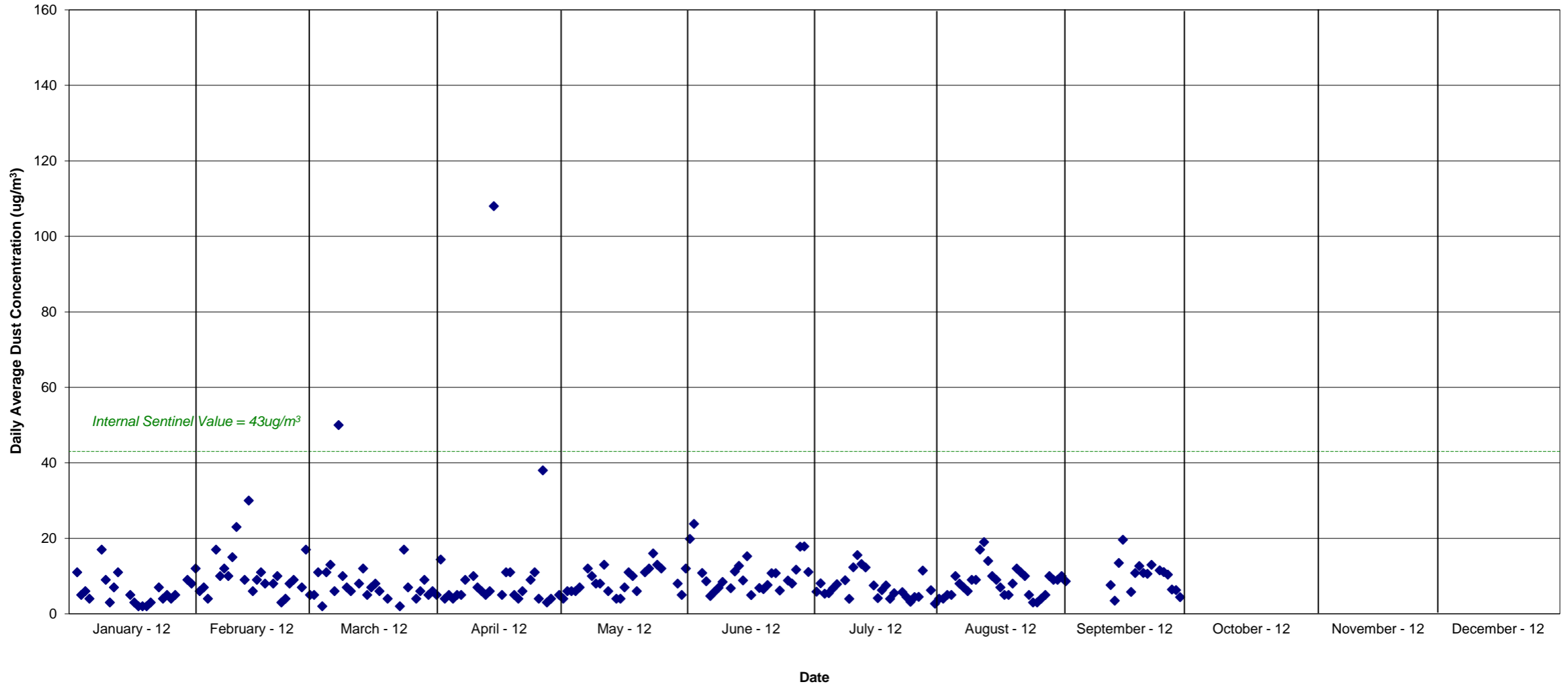
Date	Location	Comments
12/10/2011	Arroyo South	The surrounding atmosphere was generally hazy throughout the day. The smell of smoke was observed onsite indicating that smoke particles from surrounding fires were migrating onto the site. Perimeter monitoring stations, including monitors upwind of site 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 $\mu\text{g}/\text{m}^3$ .



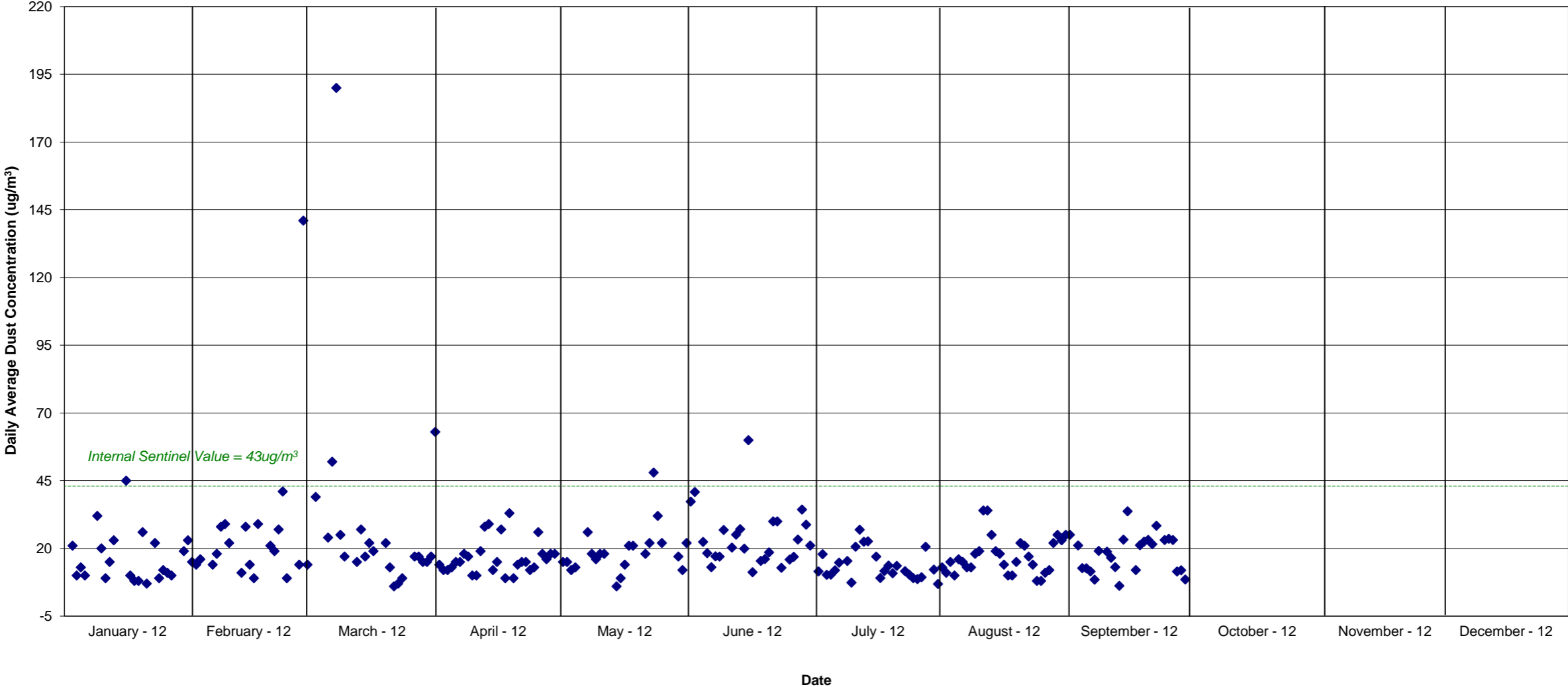
**Attachment D**

Dust Concentration Graphs

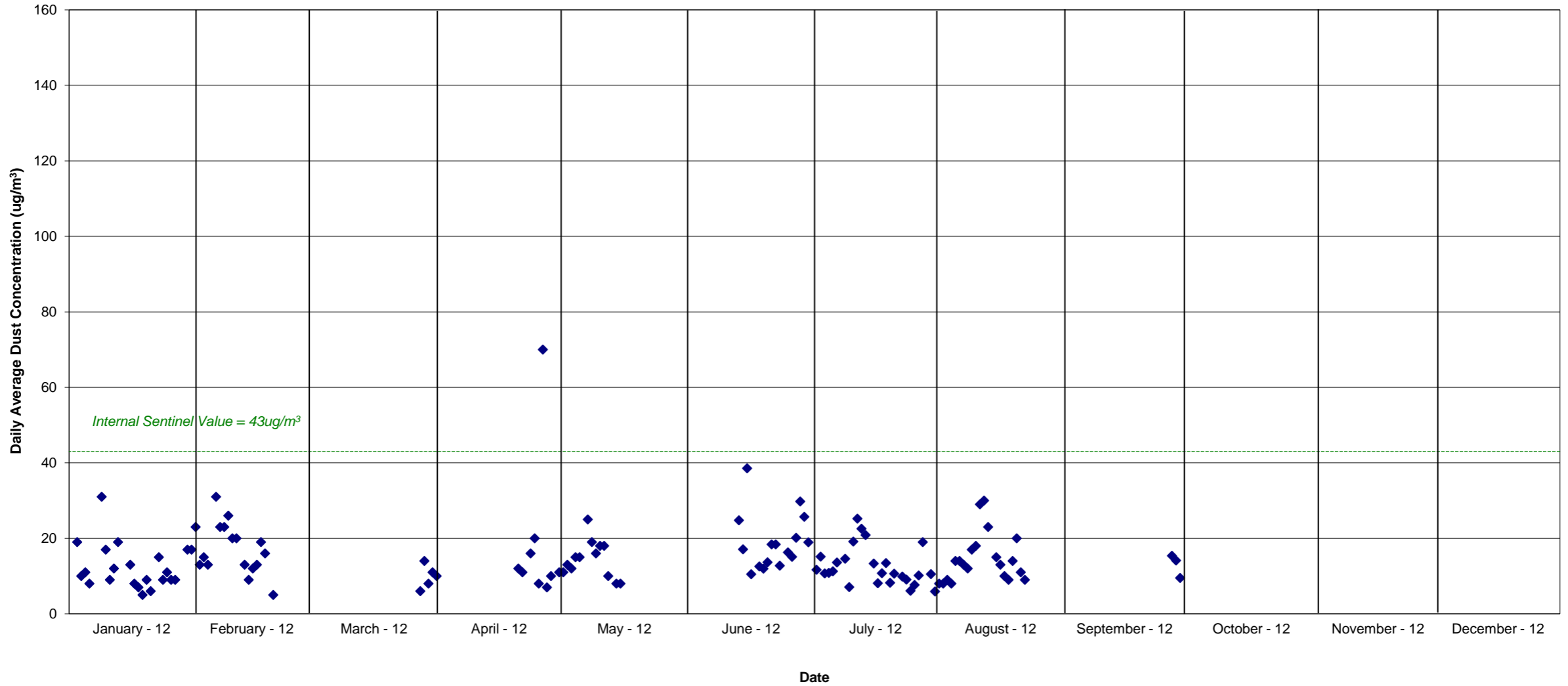
2012 Dust Monitor Summary  
Calavera Monitor Location  
Former ASARCO Smelting Facility  
El Paso, Texas



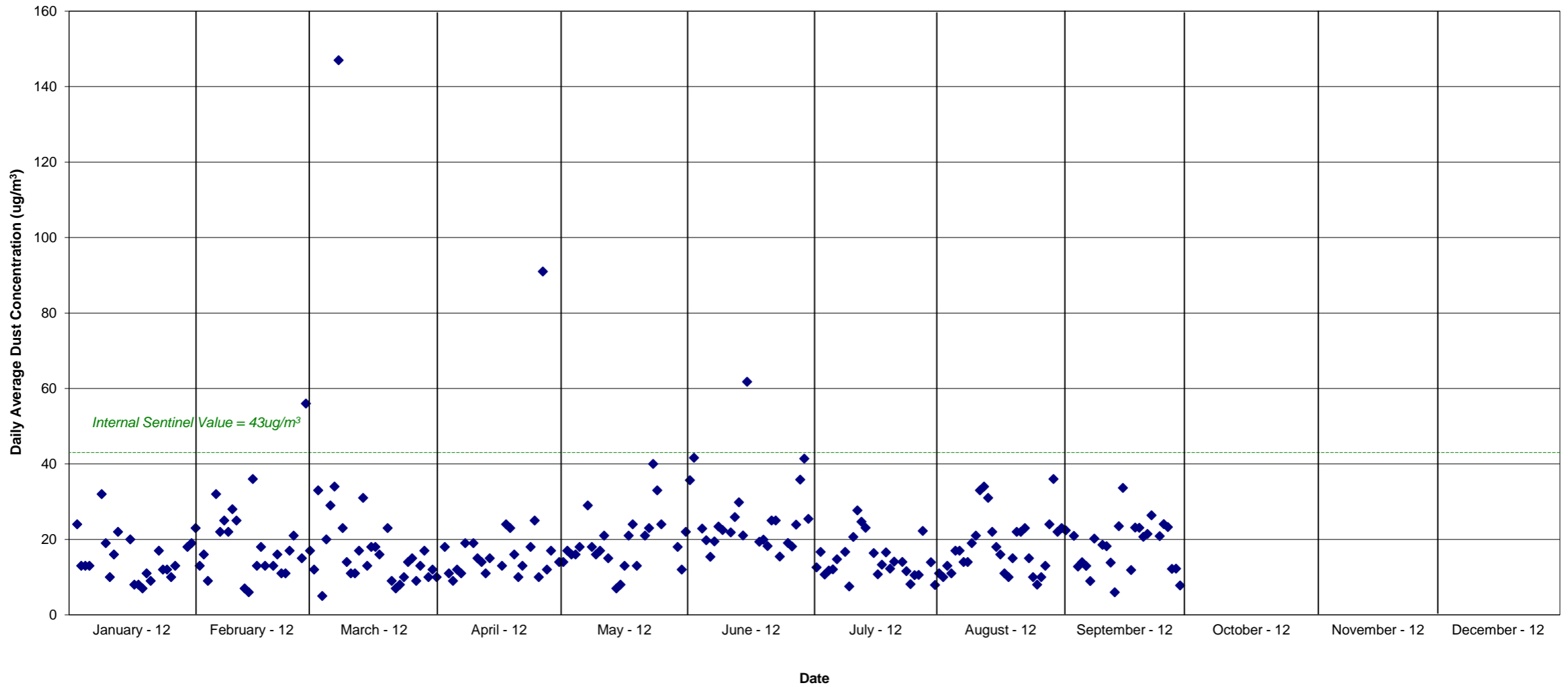
2012 Dust Monitor Summary  
East Monitor Location  
Former ASARCO Smelting Facility  
El Paso, Texas



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

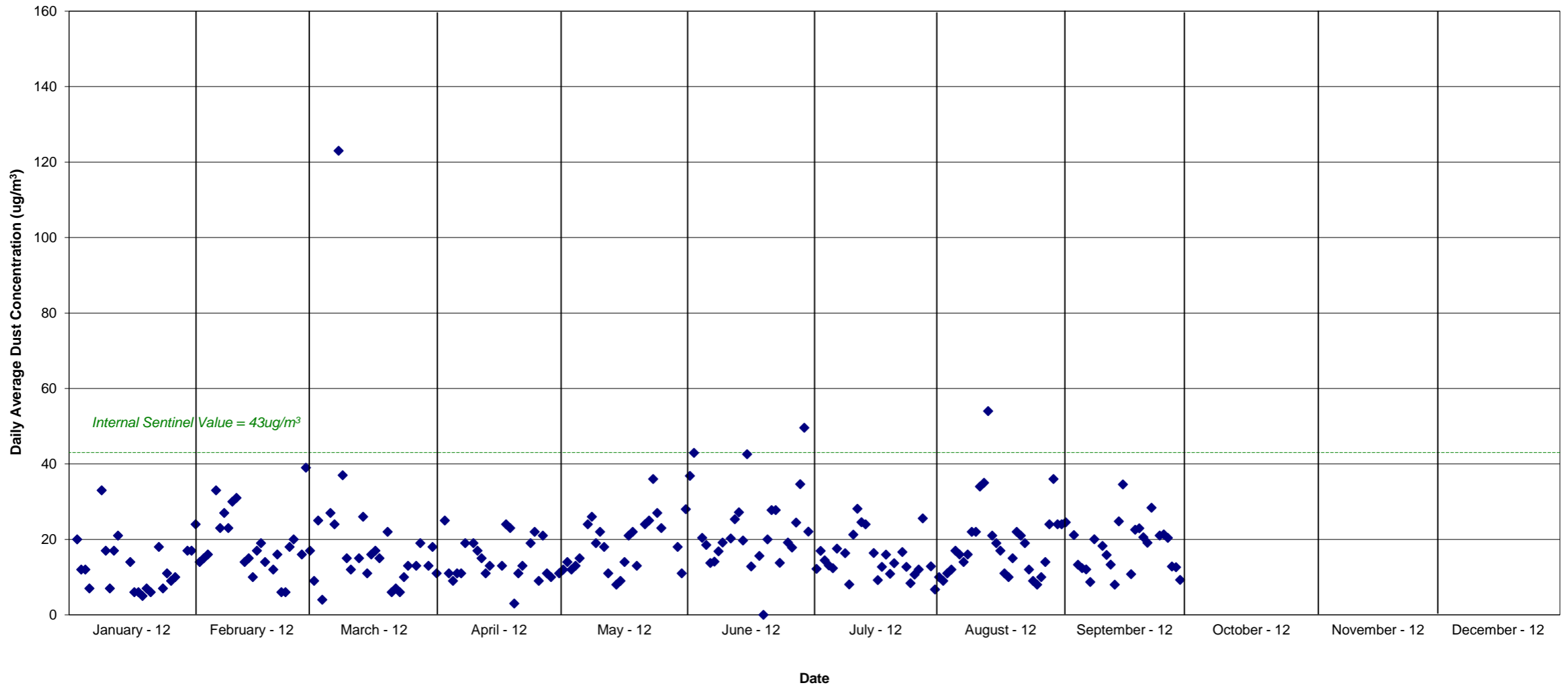


2012 Dust Monitor Summary  
North East Monitor Location  
Former ASARCO Smelting Facility  
El Paso, Texas

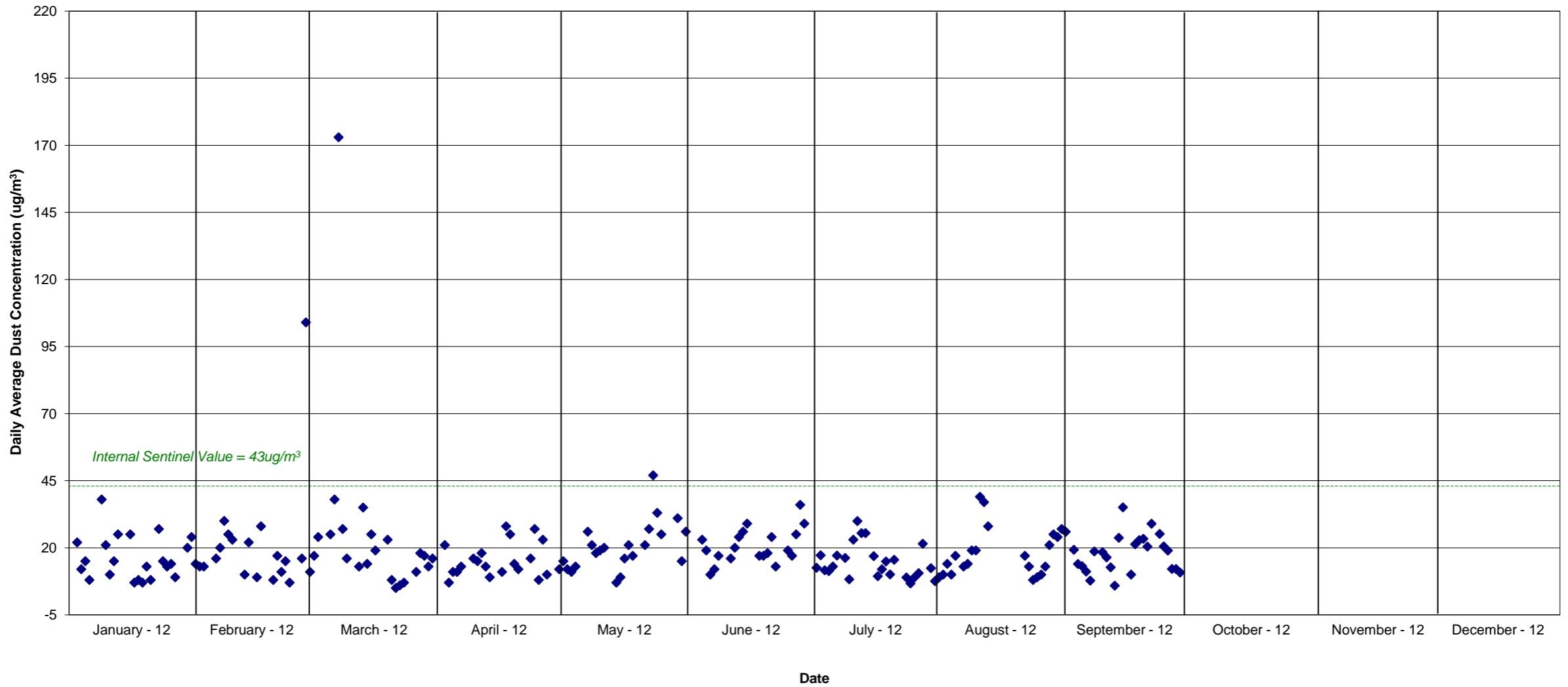




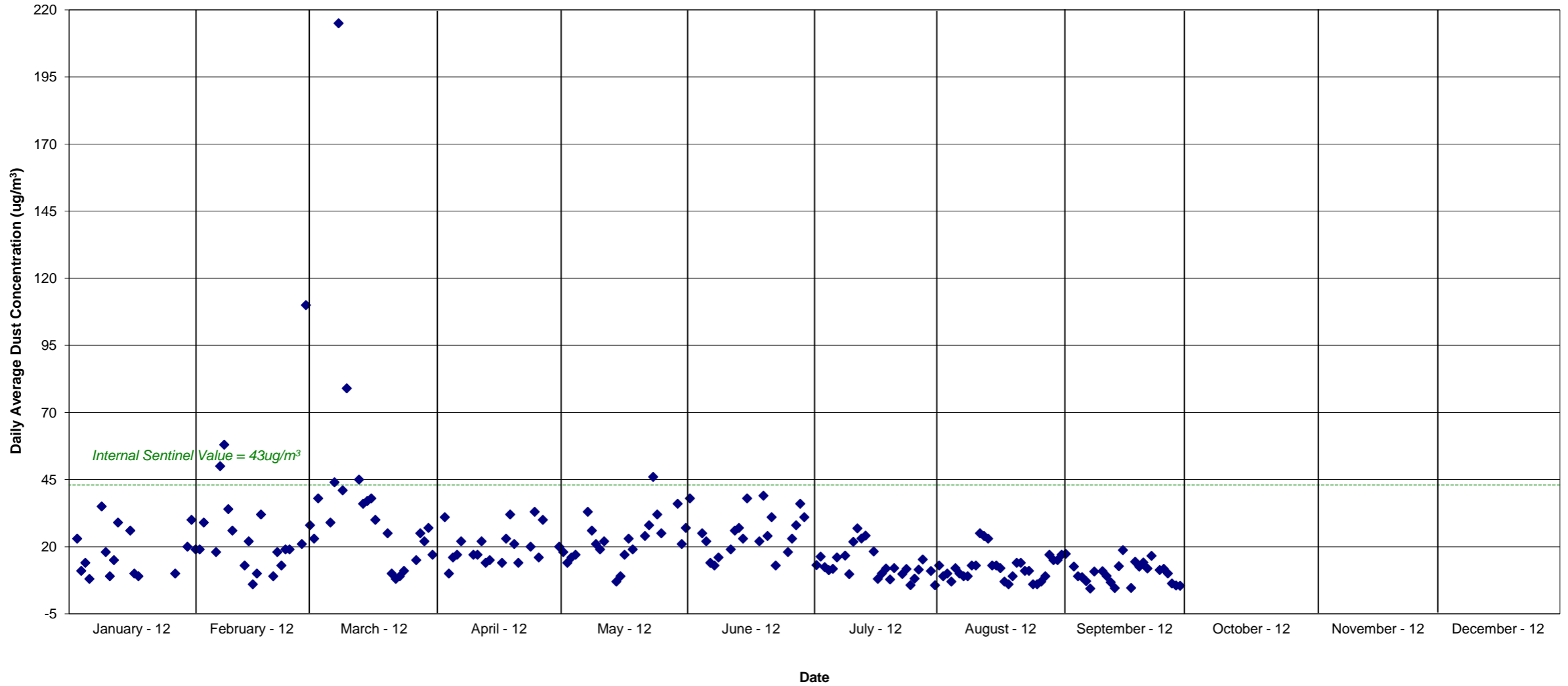
2012 Dust Monitor Summary  
North West Monitor Location  
Former ASARCO Smelting Facility  
El Paso, Texas



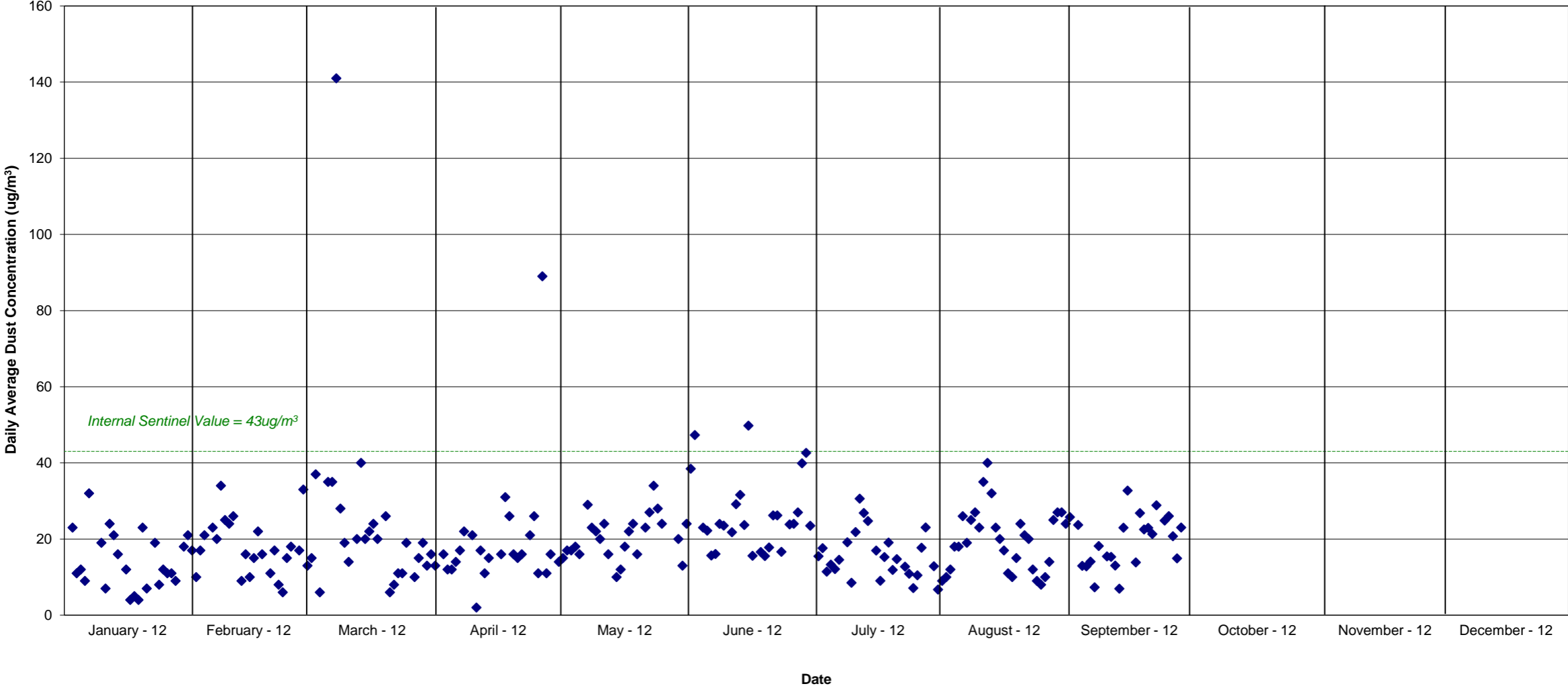
2012 Dust Monitor Summary  
South Monitor Location  
Former ASARCO Smelting Facility  
El Paso, Texas



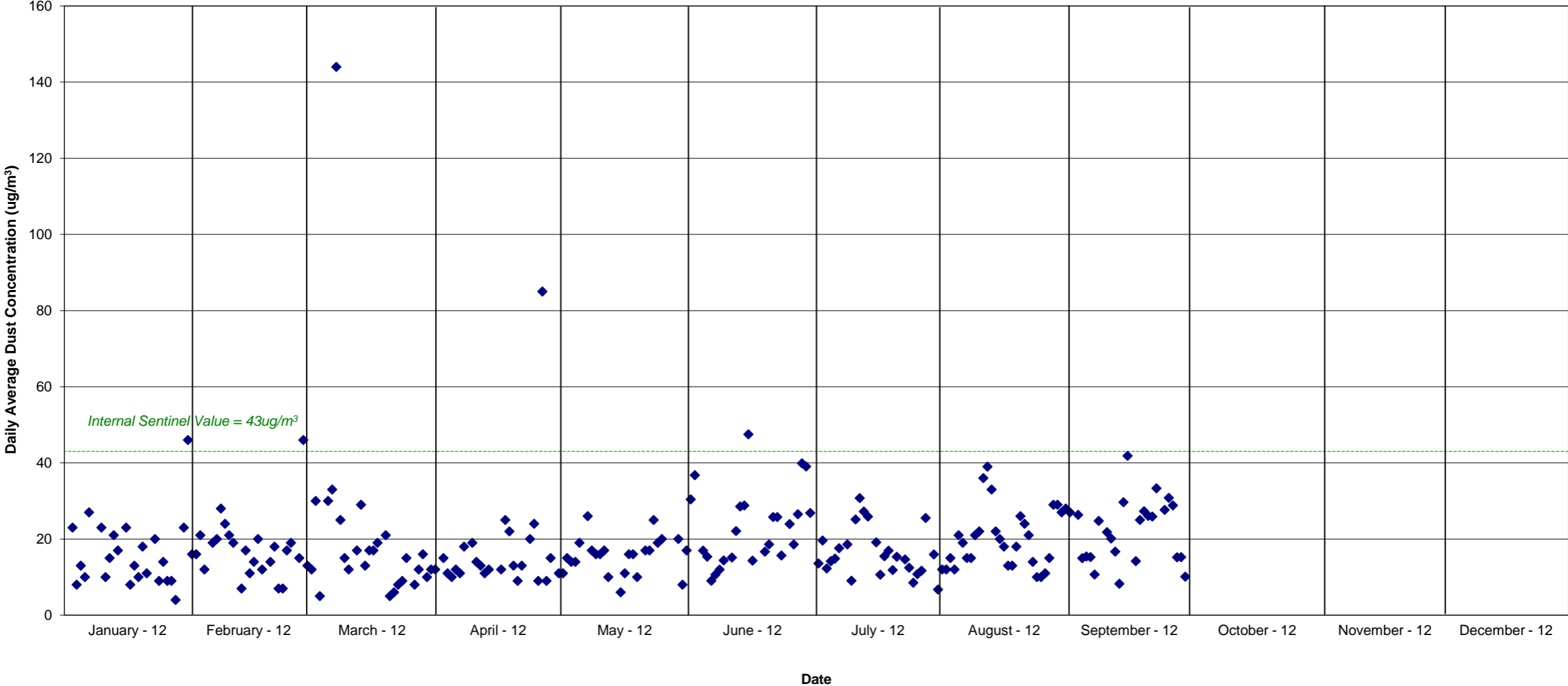
2012 Dust Monitor Summary  
West Monitor Location  
Former ASARCO Smelting Facility  
El Paso, Texas



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

