Malcolm Pirnie, Inc.
211 N. Florence St., Suite 202
El Paso, Texas 79901
T: 915.533.9025 F: 915.533.9045
www.pirnie.com

December 19, 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: November 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 November 2012. When activities with the potential to generate dust were conducted on site, dust data was collected from monitoring locations near the site fence line, around the arroyo, and near La Calavera.

The following attachments are included with this letter:

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

Dust monitor locations are shown in Attachment A, Figures 1 and 2. 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 ACTIVITY

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

The MP-6 monitor which is positioned in the North location (Attachment A, Figure 1) began transmitting a flow error on November 8th and was sent to the manufacturer, TSI, for repairs the following day. It returned to its location on the second week of December. The MP-1 monitor, which is positioned in the Arroyo West location, experienced an error flow on November 13th but was cleaned and functioning on November14th. It experienced another flow error on November 15th and was sent for repairs. It returned to its location and was properly functioning on November 26th. The MP-5 monitor positioned in the North East location had a recording error

on November 15th. This error was corrected the following day and the monitor functioned properly for the remainder of the November monitoring period. Accordingly, as presented in Attachment C, Table 2, readings for MP-1 (Arroyo West), MP-6 (North) and MP-5 (North East) are represented by 'ND' for 'not deployed' for the dates the monitors were not functioning properly.

EAST PROPERTY MONITORING

Air monitoring was conducted to monitor remediation activities on the Former ASARCO Smelter site property east of I-10 on November 1st, 2nd, 16th, 19th, and November 27th through the 29th. One monitor was positioned downwind and the other upwind of the work perimeter.

As noted in Figure 2, the same downwind location was used both days for the November 1st and 2nd monitoring event while the upwind location changed each day the work area changed. After the November 2nd sampling event the monitors were demobilized and at the end of day field checks the field staff observed that the downwind monitor had a flow error. This was later attributed to a rental company error. Since these temporary monitors were not connected to the real time monitoring RAELink system, this error was not captured. The flow error resulted in recordings for only the first half hour of each day at the downwind location. Given the lack of representative data obtained for the downwind location, the monitor flow error at this location is represented by 'ND' for both these days.

The November 16th monitoring event was conducted to monitor dust concentrations around the sand removal work area. Figure 2 presents the downwind and upwind locations for this event and Table 2 presents the data for this event. The upwind location for this event is identified in the figure with the number 1 and the downwind location with the number 2.

The November 19th monitoring event was conducted to monitor dust concentrations around the sand hauling work area. Figure 2 presents the downwind and upwind locations for this event and Table 2 presents the data for this event. The upwind location for this event is identified in the figure with the number 1 and the downwind location with the number 2.

The November 27th through 29th monitoring event was conducted to monitor dust concentrations around the debris stockpiling work area. Figure 2 presents the downwind and upwind locations for this event and Table 2 presents the data for this event. The upwind location for this event is identified in the figure with the number 1 and the downwind location with the number 2.

DUST MONITORING DATA RESULTS & SUMMARY

A summary of the November elevated dust data is provided in Attachment C, Table 1, and the November 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.

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

November 1st – The daily average dust concentration for all the monitors except the West, East Property Upwind and La Calavera monitors was greater than the sentinel value.

Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning before 5:00AM and evening hours starting at sunset. Onsite activities occur between 8:00AM and 5:00PM. The air monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to affects from an atmospheric inversion.

Atmospheric inversions trap particulate matter in the air over the mountain basin in which El Paso is located. Stagnant air accumulates during the fall and winter months and inversions most frequent in November, December, and January when there are long nights and short days. Since there is little moisture in the El Paso desert atmosphere during this time of year, strong nighttime cooling occurs under the clear skies. The air near the surface of the earth cools more rapidly than the air aloft, and forms a nighttime inversion which traps particulate matter from offsite sources. During the morning, the strong desert heating begins to break the inversion.

There was approximately a 20˚F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping particulate matter from offsite sources from the city overnight. The cooling effect after sunset created an inversion which trapped particulate matter resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to area wide meteorological conditions.

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

Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. The elevated dust daily concentrations are attributed to area wide meteorological conditions.

November 7th – The daily average dust concentration for the South, East and Arroyo South monitor was greater than the sentinel value.

Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to area wide meteorological conditions.

November 8th – The daily average dust concentration for the North monitor was greater than the sentinel value.

The North monitor had an error flow reading before the start of the work day and stopped recording before work commenced. The exceedance is attributed to the early morning inversion layer and limited data recorded for this day.

November 10th – The daily average dust concentration for all monitors except the La Calavera, North and West monitors was greater than the sentinel value.

Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. 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 two downwind locations resulted in the actual dust generated on site to be 43 µg/m^3 which is at the site-specific sentinel value of 43 µg/m^3. Dust suppression activities were increased along all unpaved haul roads and material stockpiles.

November 14th – The daily average dust concentration for the East, Arroyo South and Arroyo North monitors was greater than the sentinel value.

Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to area wide meteorological conditions.

November 28th – The daily average dust concentration for the East and North West monitors was greater than the sentinel value.

The prevailing wind was from the northeast that day. A background dust evaluation was conducted on the elevated data 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 North West (downwind) location resulted in the actual dust generated on site to be 11 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to off-site conditions.

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

The prevailing wind was from the southwest that day. For the main site work area, 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 North West (downwind) location resulted in the actual dust generated on site to be 34 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. No increase in dust suppression activities was conducted. For the east property work area, a background dust evaluation was conducted on the elevated data using the upwind monitor. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the downwind location resulted in the actual dust generated on site to be 22 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to off-site conditions.

November 30th – The daily average dust concentration for the East monitor was greater than the sentinel value.

The prevailing wind was from the south that 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 East (downwind) location resulted in the actual dust generated on site to be 22 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. No increase in dust suppression activities was conducted. The elevated dust concentrations for the day are attributed to off-site conditions.

A summary of the November elevated dust data is provided in Attachment C, Table 1, and the November 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

Alicia Fogg, PE
Project Engineer

Project 6835001

Attachments
cc: Former ASARCO Smelter Project Team

Attachment A

Figures

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

SEPTEMBER 2012

FIGURE 1

Map Document: (S:\GIS_Resources\Standards_Guidelines\MapTemplates\GIS_TEMPLATES_2005\11x17_Landscape.mxt)
7/19/2005 -- 5:27:24 PM

Air Monitoring Locations		
Date	East Upwind	East Downwind
11/1/2012	ES_4	ES_1
11/2/2012	ES_6	ES_1
11/16/2012	ES_2	ES_7
11/19/2012	ES_3	ES_7
11/27/2012	ES_5	ES_7
11/28/2012	ES_5	ES_7
11/29/2012	ES_7	ES_5

ES_2
ES_3
ES_4
ES_5
ES_1
ES_7
ES_6

Legend

- Property boundary
- Work Area 11/1/12 and 11/27-11/29/12
- Work Area 11/2/12
- Work Area 11/16 and 11/19/12
- Air Monitor

N

0 200 400

Feet

SCALE 1"= 200'

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

Texas Custodial Trust
El Paso Smelter Site

East Property Dust Monitoring

December 2012

FIGURE 2

Attachment B

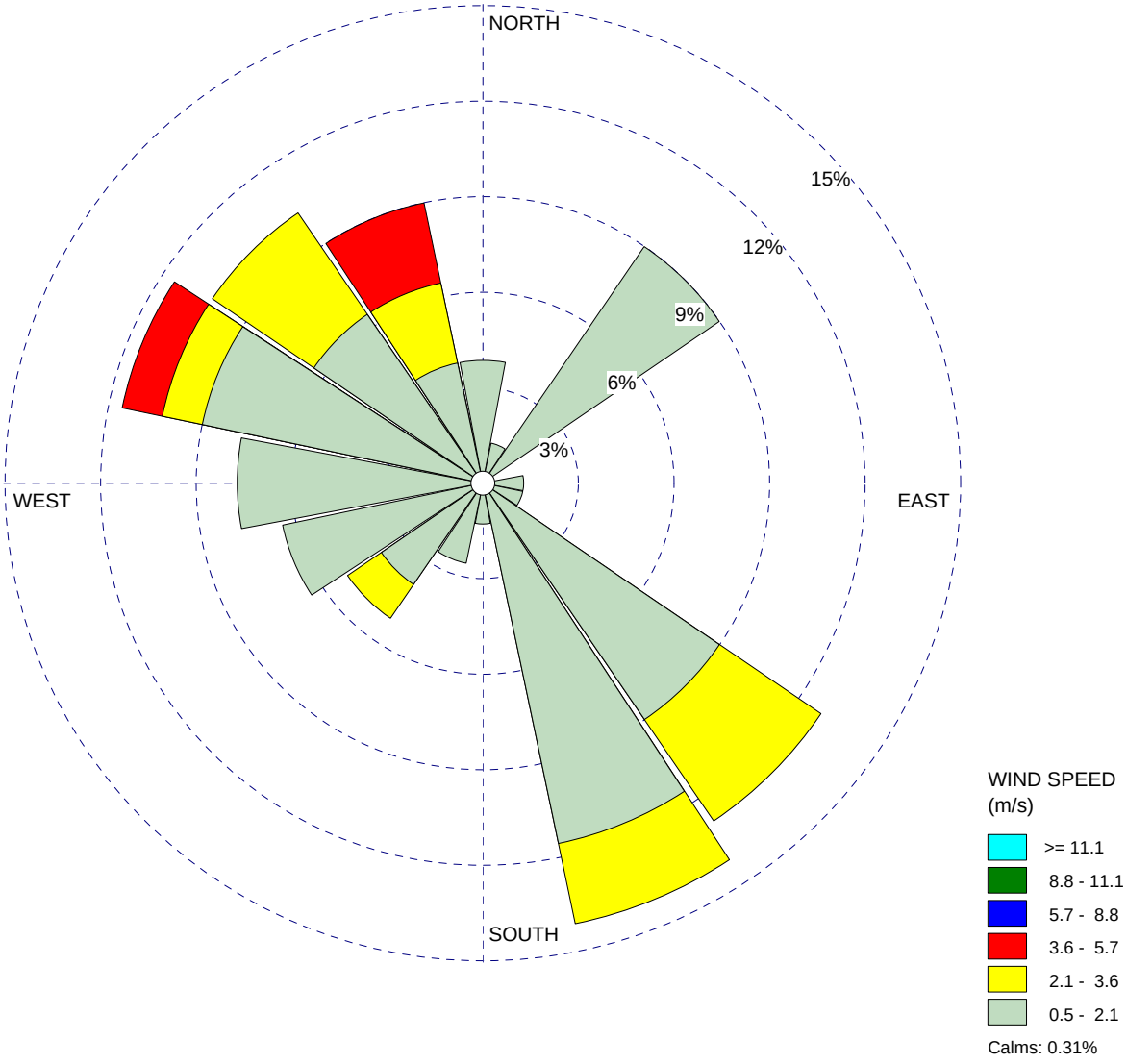
Wind Rose Plots

WIND ROSE PLOT:

Former ASARCO El Paso Smelter Remediation Site
November 2012 Wind Rose Plot

DISPLAY:

Wind Speed
Direction (blowing from)



COMMENTS:	DATA PERIOD: **Start Date: 11/1/2012 - 00:00** **End Date: 11/12/2012 - 00:00**	COMPANY NAME: **Malcolm Pirnie, Inc**	
		MODELER: **Karina E Correa**	
	CALM WINDS: **0.31%**	TOTAL COUNT: **78 hrs.**	
	AVG. WIND SPEED: **1.57 m/s**	DATE: **12/4/2012**	PROJECT NO.: **06835001.W140**

Attachment C

Tables

TABLE 1

November 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 µg/m^3.

Date	Location	Maximum Value (µg/m^3)	Comments	Action
11/1/2012	South, East, North, North East, North West, Arroyo West, Arroyo South and Arroyo North	55	Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20˚F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions.	No field modifications necessary.
11/2/2012	East, North, Arroyo West, Arroyo, South and Arroyo North	64	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.	No field modifications necessary.
11/7/2012	South, East and Arroyo South	53	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.	No field modifications necessary.
11/8/2012	North	51	The North monitor had an error flow reading before the start of the work day and stopped recording before worked commenced. The exceedance is attributed to the early morning inversion layer and limited data recorded for this day.	No field modifications necessary.
11/10/2012	South, East, North East, North West, Arroyo West, Arroyo South and Arroyo North	95	Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. 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 two downwind locations resulted in the actual dust generated on site to be 43 µg/m^3 which is at the site-specific sentinel value of 43 µg/m^3.	Dust suppression activities were increased along all unpaved haul roads and material stockpiles.

TABLE 1

November 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 µg/m^3.

Date	Location	Maximum Value (µg/m^3)	Comments	Action
11/14/2012	East, Arroyo South and Arroyo North	54	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.	No field modifications necessary.
11/28/2012	East and North West	46	The prevailing wind was from the northeast that day. A background dust evaluation was conducted on the elevated data 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 North West (downwind) location resulted in the actual dust generated on site to be 11 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. No increase in dust suppression activities was conducted. The elevated dust concentrations for the day are attributed to off-site conditions.	No field modifications necessary.
11/29/2012	North West	45	The prevailing wind was from the southwest that day. For the main site work area, 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 North West (downwind) location resulted in the actual dust generated on site to be 34 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. No increase in dust suppression activities was conducted. For the east property work area, a background dust evaluation was conducted on the elevated data using the upwind monitor. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the downwind location resulted in the actual dust generated on site to be 22 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. No increase in dust suppression activities was conducted. The elevated dust concentrations for the day are attributed to off-site conditions.	No field modifications necessary.
11/30/2012	East	44	The prevailing wind was from the south that 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 East (downwind) location resulted in the actual dust generated on site to be 22 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. No increase in dust suppression activities was conducted. The elevated dust concentrations for the day are attributed to off-site conditions.	No field modifications necessary.

TABLE 2

November Daily Average Dust Monitoring Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Week ending November 3rd						
Date	Monday, October 29, 2012	Tuesday, October 30, 2012	Wednesday, October 31, 2012	Thursday, November 01, 2012	Friday, November 02, 2012	Saturday, November 03, 2012
Location	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)
South				52	40	23
West				17	19	8
East				51	45	24
North				51	45	26
North East				44	39	24
North West				48	38	22
Calavera				24	20	12
Arroyo West				47	43	24
Arroyo South				55	50	28
Arroyo North				49	64	21
East Upwind1				*11*	*43*	
East Downwind1				*ND*	*ND*	
Week ending November 10th						
Date	Monday, November 05, 2012	Tuesday, November 06, 2012	Wednesday, November 07, 2012	Thursday, November 08, 2012	Friday, November 09, 2012	Saturday, November 10, 2012
Location	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)
South	21	33	53	34	8	61
West	8	10	16	10	3	29
East	26	31	47	32	9	95
North	26	38	39	51	ND	ND
North East	22	29	37	30	8	91
North West	23	29	34	31	7	47
Calavera	12	16	20	14	4	19
Arroyo West	24	32	33	28	7	54
Arroyo South	25	32	45	36	10	91
Arroyo North	15	29	41	33	9	54
Week ending November 17th						
Date	Monday, November 12, 2012	Tuesday, November 13, 2012	Wednesday, November 14, 2012	Thursday, November 15, 2012	Friday, November 16, 2012	Saturday, November 17, 2012
Location	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)
South	9	27	43	36	15	30
West	3	12	14	14	5	10
East	9	24	44	34	14	26
North	ND	ND	ND	ND	ND	ND
North East	10	20	28	ND	15	26
North West	10	26	39	31	15	32
Calavera	4	8	23	15	5	14
Arroyo West	13	ND	37	ND	ND	ND
Arroyo South	13	20	54	35	17	32
Arroyo North	9	26	46	37	18	28
East Upwind2					*16*	
East Downwind2					*20*	
Week ending November 24th						
Date	Monday, November 19, 2012	Tuesday, November 20, 2012	Wednesday, November 21, 2012	Thursday, November 22, 2012	Friday, November 23, 2012	Saturday, November 24, 2012
Location	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)
South						
West						
East						
North						
North East						
North West						
Calavera						
Arroyo West						
Arroyo South						
Arroyo North						
East Upwind3	*18*					
East Downwind3	*18*					
Week ending December 1st						
Date	Monday, November 26, 2012	Tuesday, November 27, 2012	Wednesday, November 28, 2012	Thursday, November 29, 2012	Friday, November 30, 2012	Saturday, December 01, 2012
Location	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)
South	29	23	40	28	22	
West	6	6	11	9	7	
East	23	25	46	ND	44	
North	ND	ND	ND	ND	ND	
North East	21	24	34	27	15	
North West	23	32	45	44	26	
Calavera	10	12	19	15	7	
Arroyo West	ND	37	41	33	23	
Arroyo South	27	29	40	33	18	
Arroyo North	19	24	34	23	15	
East Upwind4		*27*	*17*	*23*		
East Downwind4		*33*	*11*	*45*		

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 or experienced errors 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
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.
11/1/2012	South	Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20˚F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions.
11/2/2012	South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.
11/7/2012	South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.
11/10/2012	South	Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. 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 two downwind locations resulted in the actual dust generated on site to be 43 µg/m^3 which is at the site-specific sentinel value of 43 µg/m^3.

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
11/14/2012	South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. 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
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
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 µg/m3 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 µg/m^3 which is below the site-specific sentinel value of 43 µg/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 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3.
11/1/2012	North West	Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20˚F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions.
11/10/2012	North West	Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. 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 two downwind locations resulted in the actual dust generated on site to be 43 µg/m^3 which is at the site-specific sentinel value of 43 µg/m^3.
11/28/2012	North West	The prevailing wind was from the northeast that day. A background dust evaluation was conducted on the elevated data 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 North West (downwind) location resulted in the actual dust generated on site to be 11 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. No increase in dust suppression activities was conducted. 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
11/29/2012	North West	The prevailing wind was from the southwest that day. For the main site work area, 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 North West (downwind) location resulted in the actual dust generated on site to be 34 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. No increase in dust suppression activities was conducted. For the east property work area, a background dust evaluation was conducted on the elevated data using the upwind monitor. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the downwind location resulted in the actual dust generated on site to be 22 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. No increase in dust suppression activities was conducted. 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
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.
11/1/2012	North	Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20˚F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions.
11/2/2012	North	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.
11/8/2012	North	The North monitor had an error flow reading before the start of the work day and stopped recording before worked commenced. The exceedance is attributed to the early morning inversion layer and limited data recorded for this day.

Dust Monitor Summary
North East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
11/2/2011	North East	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions.
11/30/2011	North East	The surrounding atmosphere was hazy throughout the day. Monitor stations upwind of site activities and monitors with no demolition activities in their proximity recorded elevated data. The elevated readings are attributed to off-site conditions.
12/1/2011	North East	Windy and hazy conditions existed throughout the day, and the surrounding atmospheric conditions were poor. Subtracting background dust from the average dust reading for the North East monitor results in the actual dust generated on site to be 30 ug/m3 for the North East monitor. Accounting for background dust concentration places site generated dust below the sentinel value.
2/28/2012	North East	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.
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 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$.
11/1/2012	North East	Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20˚F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions.
11/10/2012	North East	Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. 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 two downwind locations resulted in the actual dust generated on site to be 43 $\mu g/m^3$ which is at the site-specific sentinel value of 43 $\mu g/m^3$.

Dust Monitor Summary
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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 µg/m^3 which is below the site-specific sentinel value of 43 µg/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 µg/m^3 which is below the site-specific sentinel value of 43 µg/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.
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
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
11/1/2012	East	Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20˚F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions.
11/2/2012	East	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.
11/7/2012	East	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.
11/10/2012	East	Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. 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 two downwind locations resulted in the actual dust generated on site to be 43 µg/m^3 which is at the site-specific sentinel value of 43 µg/m^3.
11/14/2012	East	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.
11/28/2012	East	The prevailing wind was from the northeast that day. A background dust evaluation was conducted on the elevated data 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 North West (downwind) location resulted in the actual dust generated on site to be 11 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. No increase in dust suppression activities was conducted. The elevated dust concentrations for the day are attributed to off-site conditions.
11/30/2012	East	The prevailing wind was from the south that 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 East (downwind) location resulted in the actual dust generated on site to be 22 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. No increase in dust suppression activities was conducted. 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
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.
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.
11/1/2012	Arroyo West	Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20˚F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions. The elevated dust concentrations for the day are attributed to off-site conditions.
11/2/2012	Arroyo West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions. The elevated dust concentrations for the day are attributed to off-site conditions.
11/10/2012	Arroyo West	Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. 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 two downwind locations resulted in the actual dust generated on site to be 43 µg/m^3 which is at the site-specific sentinel value of 43 µg/m^3.

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.
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 µg/m^3 which is below the site-specific sentinel value of 43 µg/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 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3.
11/1/2012	Arroyo North	Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20˚F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions.
11/2/2012	Arroyo North	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.
11/10/2012	Arroyo North	Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. 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 two downwind locations resulted in the actual dust generated on site to be 43 µg/m^3 which is at the site-specific sentinel value of 43 µg/m^3.
11/14/2012	Arroyo North	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. 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 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$.
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 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$.
11/1/2012	Arroyo South	Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20˚F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions.
11/2/2012	Arroyo South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.

Dust Monitor Summary
Arroyo South Elevated Data Summary

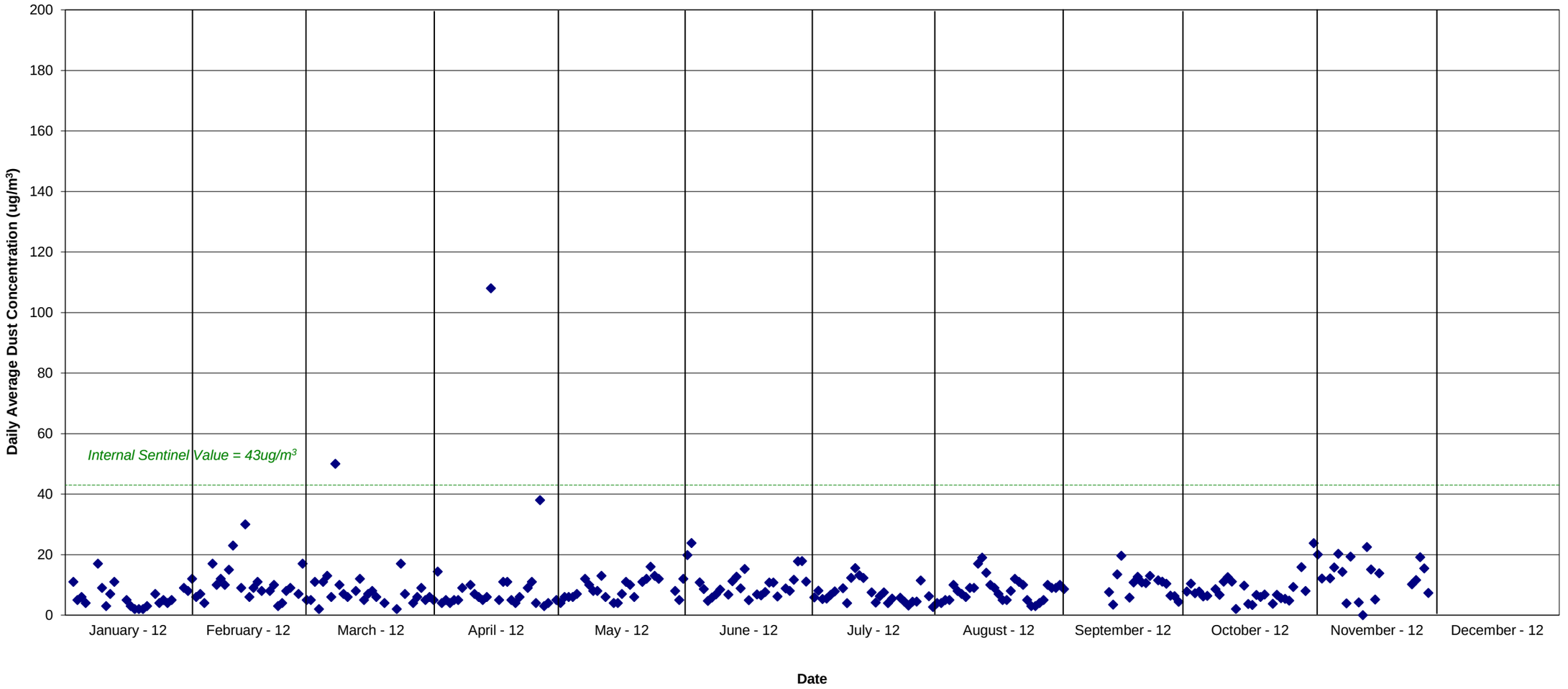
Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
11/7/2012	Arroyo South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.
11/10/2012	Arroyo South	Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. 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 two downwind locations resulted in the actual dust generated on site to be 43 µg/m^3 which is at the site-specific sentinel value of 43 µg/m^3.
11/14/2012	Arroyo South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.

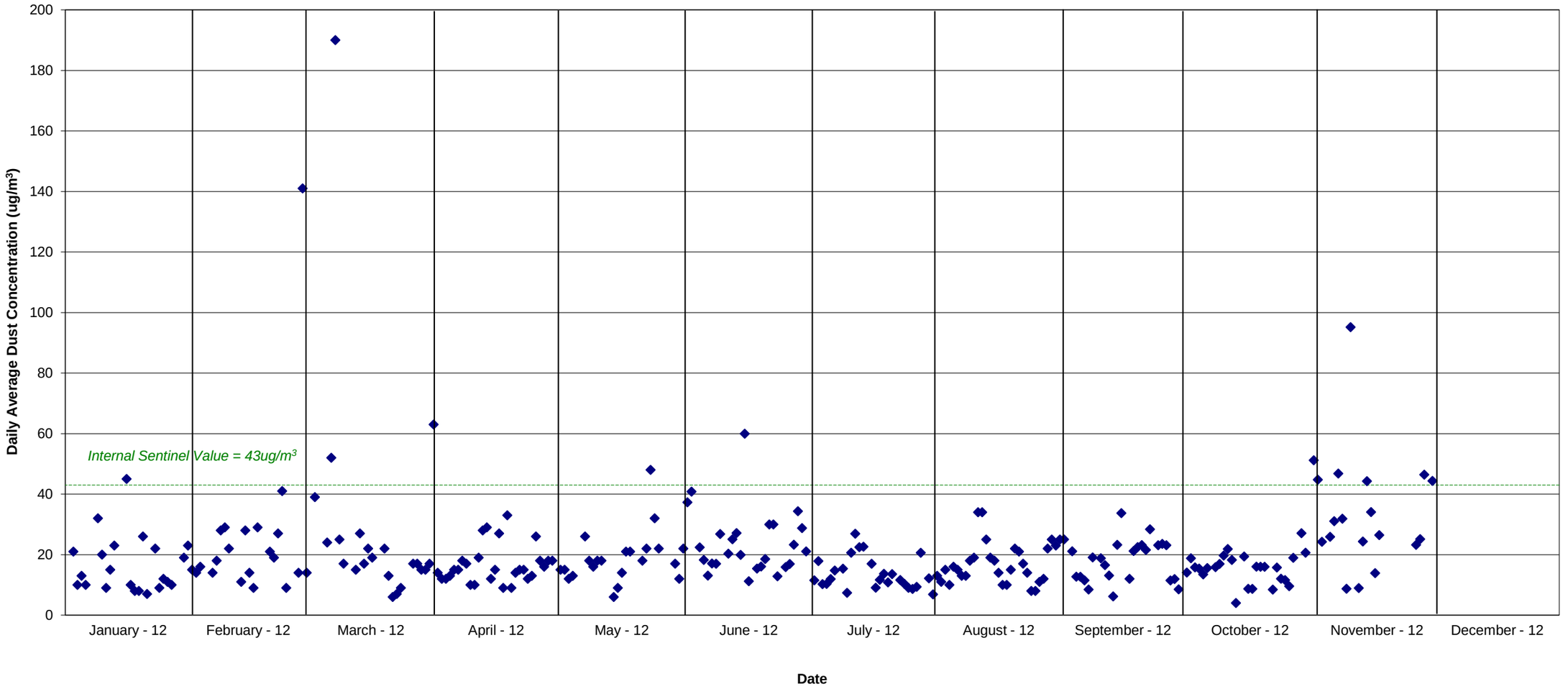
Attachment D

Dust Concentration Graphs

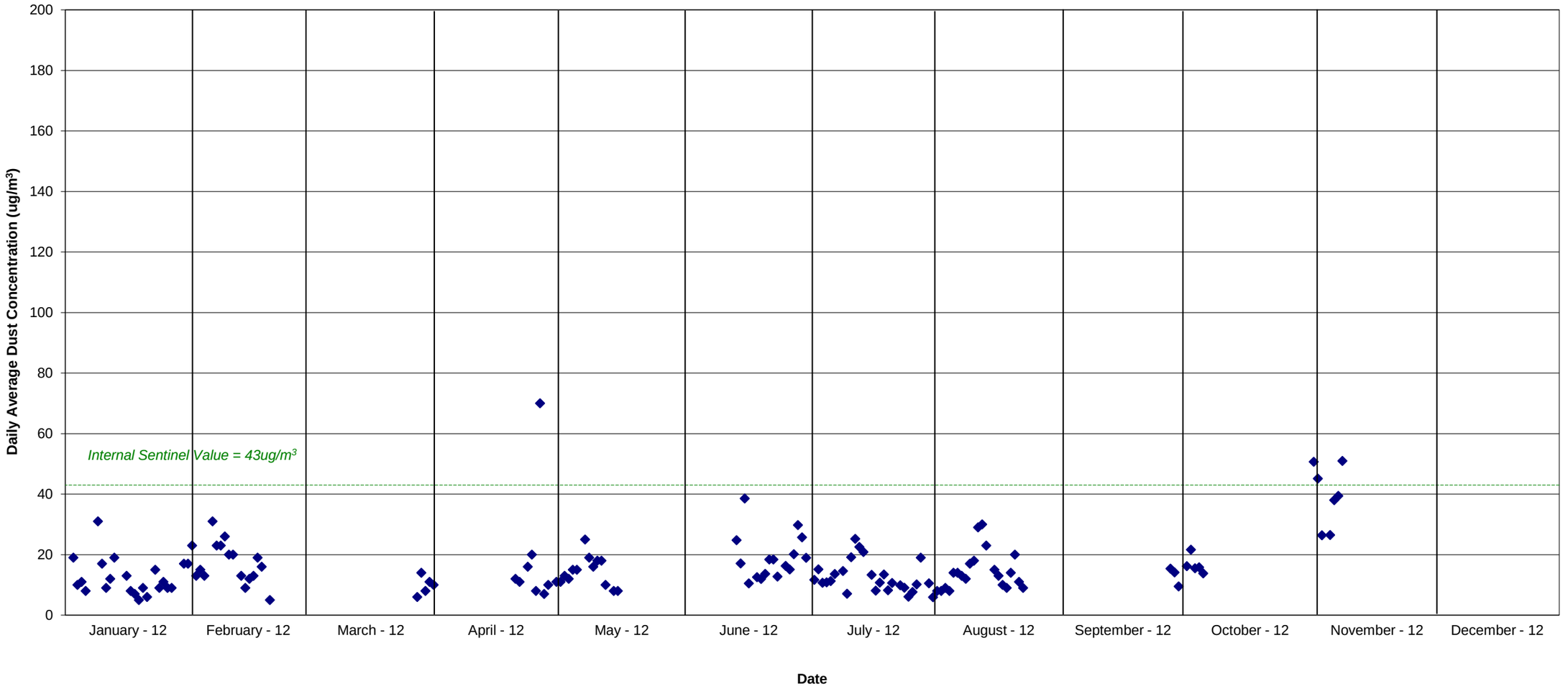
2012 Dust Monitor Summary
Calavera Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



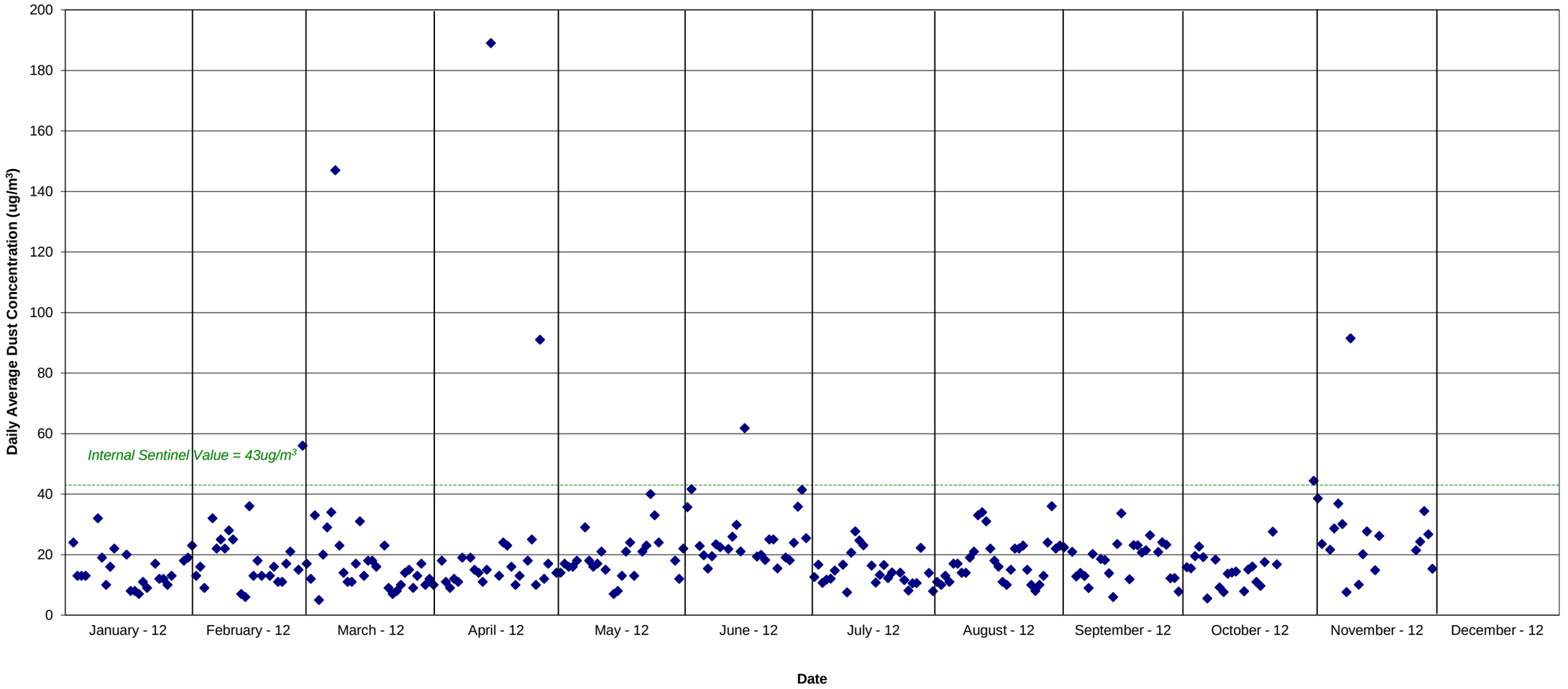
2012 Dust Monitor Summary
East Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



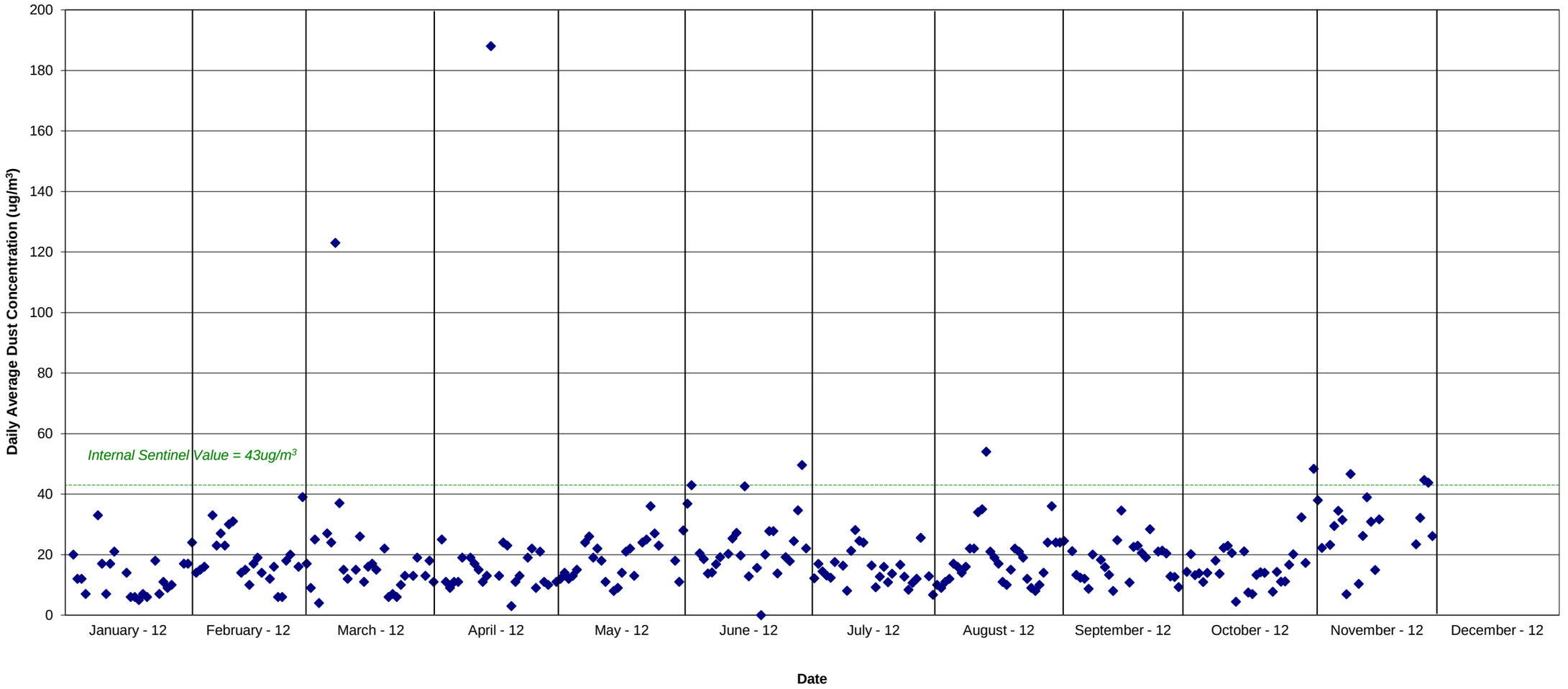
2012 Dust Monitor Summary
North Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



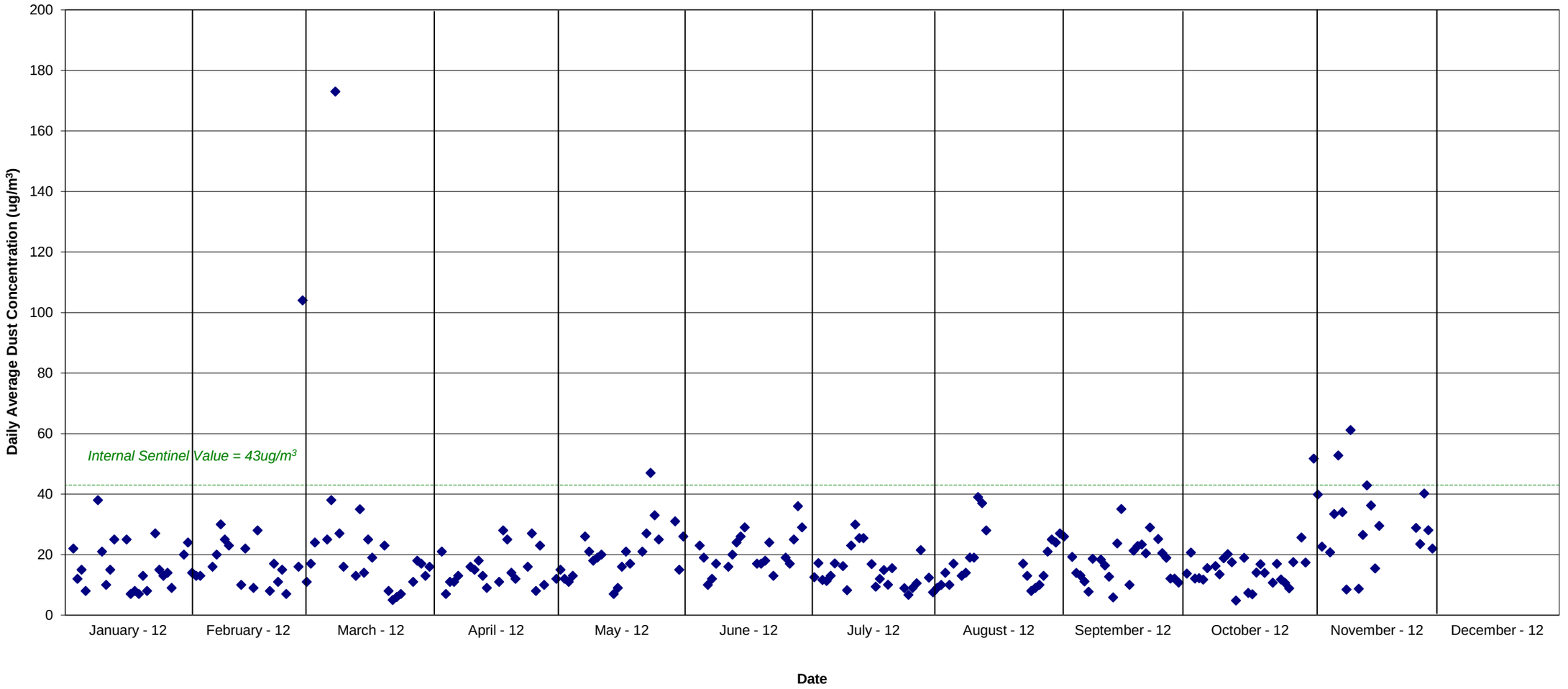
2012 Dust Monitor Summary
North East Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



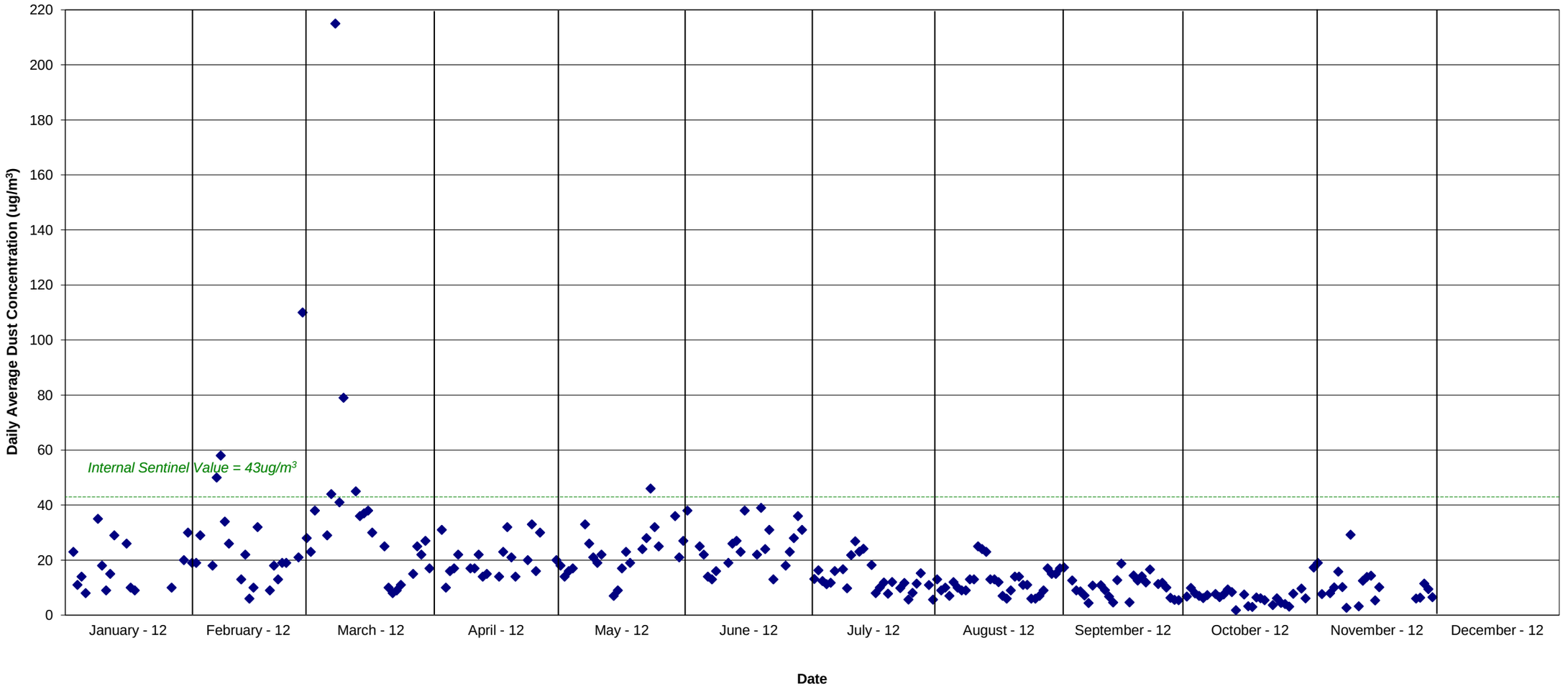
2012 Dust Monitor Summary
North West Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



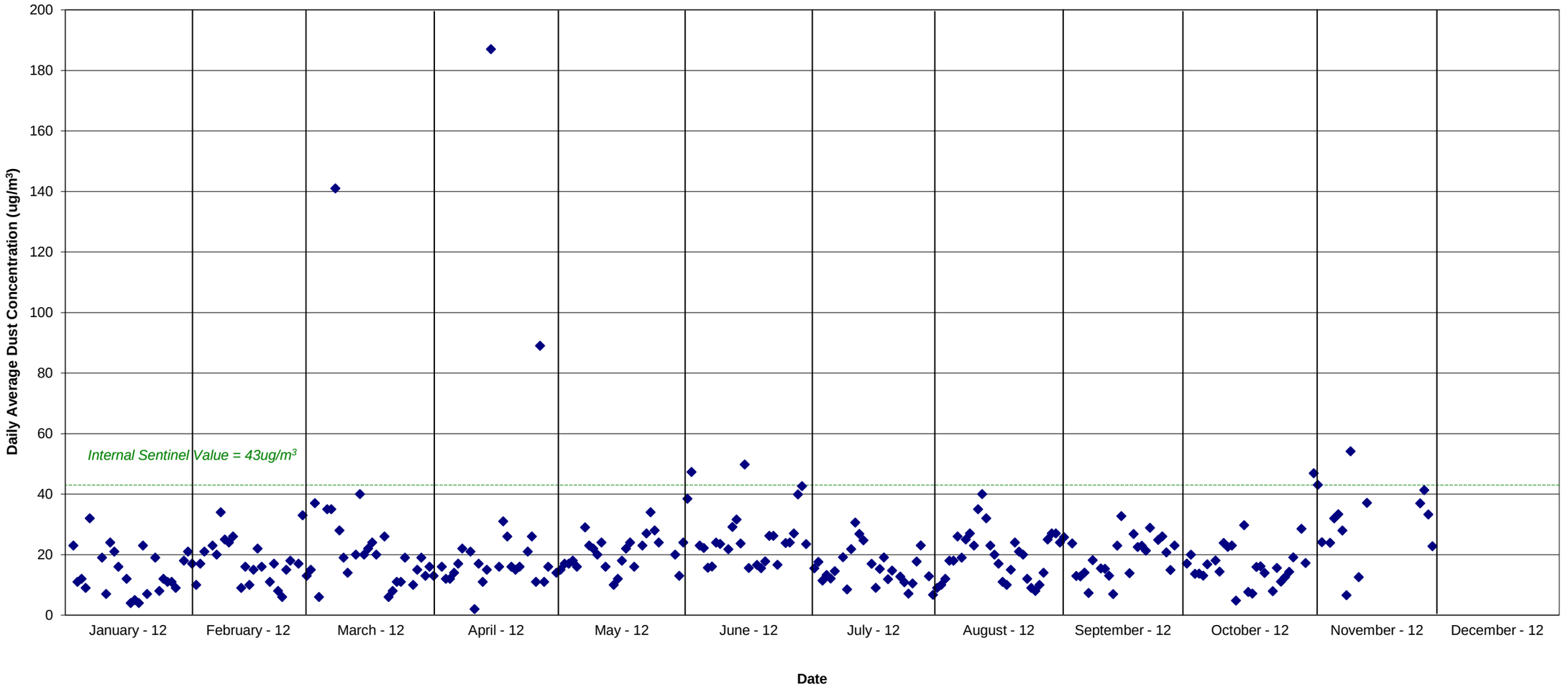
2012 Dust Monitor Summary
South Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



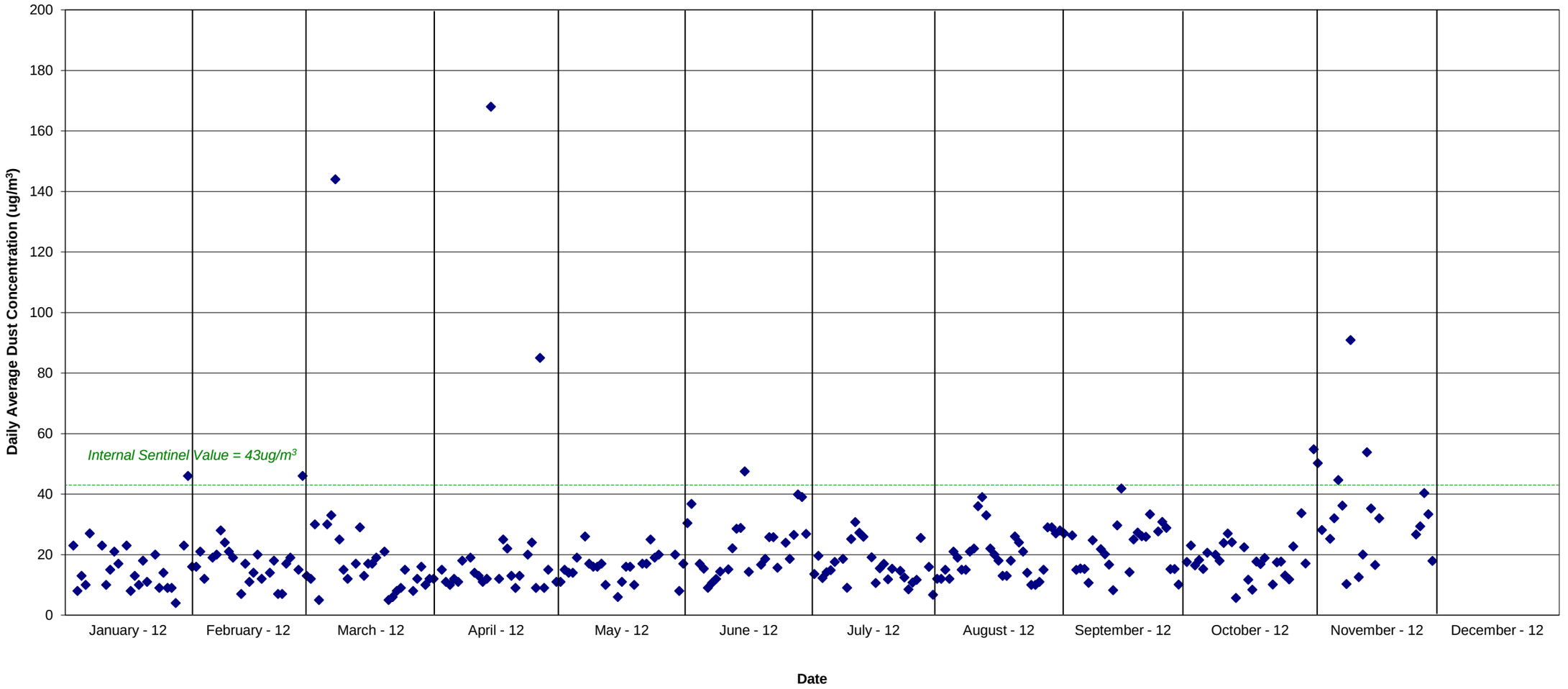
2012 Dust Monitor Summary
West Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



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