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February 7, 2013

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

Subject: January 2013 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 January 2013. 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. Dust monitoring was also conducted on the east property during the month of January.

The following attachments are included with this letter:

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

Dust monitor locations are shown in Attachment A, Figure 1 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-4 monitor which is positioned in the Calavera location (Attachment A, Figure 1) began transmitting a flow error on January 12th and was sent to the manufacturer, TSI, for repairs the on January 14th at which time MP-6, the backup monitor positioned in the North location, was positioned at Calavera location. MP-6 had a flow error on January 17th and 18th while it was positioned at Calavera but was cleaned on site and then operated properly. MP-6 was positioned at Calavera until January 26th when it was sent to the manufacturer, TSI, for repairs. The MP-3 monitor which is positioned in the Arroyo North location began transmitting a flow error on

January 21st and was sent to the manufacturer, TSI, for repairs. All three monitors are still with the manufacturer being repaired. Accordingly, as presented in Attachment C, Table 2, readings for MP-6 (North), MP-3 (Arroyo North) and MP-4 (Calavera) 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 January 10th and 11th. One monitor was positioned downwind and the other upwind of the work perimeter. Daily average dust concentrations were at or below the site-specific sentinel value of 43 $\mu g/m^3$ during the east property remediation activities. Daily average dust concentration data for this monitoring is provided in Attachment C, Table 2.

DUST MONITORING DATA RESULTS & SUMMARY

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

January 5th – The daily average dust concentration for the Arroyo South monitor was greater than the sentinel value.

Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty-three percent of the instantaneous exceedances occurred in the evening or early morning, outside working hours. A light freezing fog was present from 9AM to 11AM which contributes to higher readings in the air monitors due to the presence of water vapor. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 32 $\mu g/m^3$ for this monitor was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

January 10th – The daily average dust concentration for the South, East and Arroyo West monitors was greater than the sentinel value.

Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-six percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust

concentration of 15 μg/m^3 for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

January 16th – The daily average dust concentration for the South monitor was greater than the sentinel value.

Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-one percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 12 μg/m^3 for this monitor was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

January 18th – The daily average dust concentration for the South, East, North West and Arroyo West monitors was greater than the sentinel value.

Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty-seven percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 19 μg/m^3 for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

January 19th – The daily average dust concentration for all monitors except the West and Arroyo North monitors was greater than the sentinel value.

Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-nine percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 18 μg/m^3 for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

January 21st – The daily average dust concentration for the Arroyo West monitor was greater than the sentinel value.

Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-seven percent of

instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 23 $\mu g/m^3$ for this monitor was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

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

Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty-eight percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 21 $\mu g/m^3$ for this monitor was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

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

Date	Air Monitoring Locations	
	East Upwind	East Downwind
1/10/2013	ES_2	ES_1
1/11/2013	ES_2	ES_1

ES_1

ES_2

Legend

- Property boundary
- Work Area 01/10/13 and 01/11/13
- Air Monitor

N

0 200 400

Feet

SCALE 1"= 200'

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Texas Custodial Trust
El Paso Smelter Site

East Property Dust Monitoring

February 2013

FIGURE 2

Attachment B

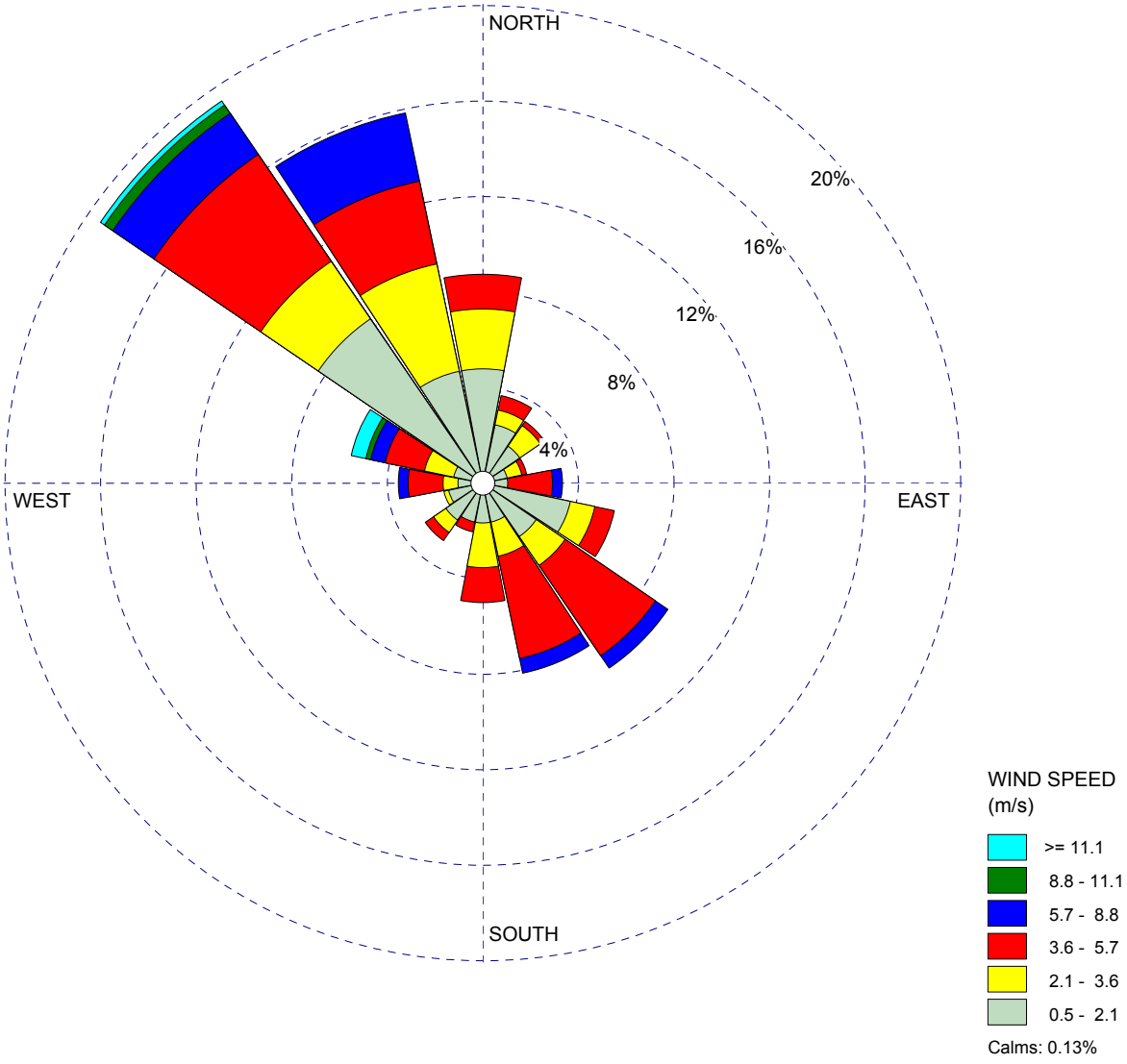
Wind Rose Plots

WIND ROSE PLOT:

Former ASARCO El Paso Smelter Remediation Site
January 2013 Wind Rose Plot

DISPLAY:

Wind Speed
Direction (blowing from)



COMMENTS:	DATA PERIOD: **Start Date: 1/3/2012 - 10:00** **End Date: 1/31/2012 - 23:00**	COMPANY NAME: **Malcolm Pirnie, Inc**	
		MODELER: **Karina E Correa**	
	CALM WINDS: **0.13%**	TOTAL COUNT: **481 hrs.**	
	AVG. WIND SPEED: **3.12 m/s**	DATE: **2/1/2013**	PROJECT NO.: **06835001.2012**

Attachment C

Tables

TABLE 1

January 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 43µg/m^3.

Date	Location	Average Value (µg/m^3)	Comments	Action
1/5/2013	Arroyo South	44	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty-three percent of the instantaneous exceedances occurred in the evening or early morning, outside working hours. A light freezing fog was present from 9AM to 11AM which contributes to higher readings in the air monitors due to the presence of water vapor. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 32 µg/m^3 for this monitor was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.	No field modifications necessary.
1/10/2013	South, East and Arroyo West	50	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-six percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 15 µg/m^3 for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.	No field modifications necessary.
1/16/2013	South	47	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-one percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 12 µg/m^3 for this monitor was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.	No field modifications necessary.
1/18/2013	South, East, North West and Arroyo West	47	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty-seven percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 19 µg/m^3 for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.	No field modifications necessary.
1/19/2013	All except, West and Arroyo North	47	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-nine percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 18 µg/m^3 for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.	No field modifications necessary.

TABLE 1

January 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 43µg/m^3.

Date	Location	Average Value (µg/m^3)	Comments	Action
1/21/2013	Arroyo West	45	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-seven percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 23 µg/m^3 for this monitor was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.	No field modifications necessary.
1/23/2013	East and Arroyo West	44	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty-eight percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 21 µg/m^3 for this monitor was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.	No field modifications necessary.

TABLE 2

January Daily Average Dust Monitoring Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Week ending January 5th						
Date	Monday, December 31, 2012	Tuesday, January 01, 2013	Wednesday, January 02, 2013	Thursday, January 03, 2013	Friday, January 04, 2013	Saturday, January 05, 2013
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					23	39
West					5	9
East					19	32
North					ND	17
North East					20	31
North West					22	36
Calavera					14	22
Arroyo West					24	42
Arroyo South					25	44
Arroyo North					24	41
Week ending January 12th						
Date	Monday, January 07, 2013	Tuesday, January 08, 2013	Wednesday, January 09, 2013	Thursday, January 10, 2013	Friday, January 11, 2013	Saturday, January 12, 2013
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	10	30	36	55	25	6
West	3	9	11	19	7	2
East	10	23	32	46	27	7
North	7	16	19	31	14	4
North East	10	ND	29	36	21	6
North West	10	21	25	41	18	6
Calavera	5	11	10	19	15	ND
Arroyo West	11	24	27	48	23	7
Arroyo South	11	23	27	41	23	6
Arroyo North	11	22	24	39	21	6
East Upwind1				12	15	
East Downwind1				12	16	
Week ending January 19th						
Date	Monday, January 14, 2013	Tuesday, January 15, 2013	Wednesday, January 16, 2013	Thursday, January 17, 2013	Friday, January 18, 2013	Saturday, January 19, 2013
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	20	28	47	26	50	46
West	6	8	14	8	19	12
East	23	23	34	26	51	46
North	16	11	ND	ND	ND	ND
North East	18	16	28	22	39	43
North West	20	17	32	23	45	44
Calavera	10	8	2	ND	ND	46
Arroyo West	23	21	37	30	44	56
Arroyo South	21	21	32	27	39	49
Arroyo North	20	16	30	23	41	39
Week ending January 26th						
Date	Monday, January 21, 2013	Tuesday, January 22, 2013	Wednesday, January 23, 2013	Thursday, January 24, 2013	Friday, January 25, 2013	Saturday, January 26, 2013
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	37	29	40	29	29	32
West	12	9	11	6	6	9
East	34	29	44	24	24	28
North	ND	ND	ND	ND	ND	ND
North East	34	27	35	23	23	28
North West	38	26	39	35	35	33
Calavera	26	23	31	24	24	28
Arroyo West	45	38	43	29	29	34
Arroyo South	35	31	38	27	27	31
Arroyo North	ND	ND	ND	ND	ND	33
Week ending February 2nd						
Date	Monday, January 28, 2013	Tuesday, January 29, 2013	Wednesday, January 30, 2013	Thursday, January 31, 2013	Friday, February 01, 2013	Saturday, February 02, 2013
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	17	20	6	28		
West	5	8	2	9		
East	17	30	5	22		
North	ND	ND	ND	ND		
North East	16	20	4	16		
North West	15	14	4	17		
Calavera	16	16	5	17		
Arroyo West	19	16	4	19		
Arroyo South	18	19	5	20		
Arroyo North	ND	ND	ND	ND		

NOTES:

1. Readings indicate PM_{10} dust based on direct read monitoring from TSI DustTrak II equipment.
2. Gray cell indicates that dust monitoring was not conducted that day because there were no demolition or remediation activities that day.
3. ND indicates that monitor was not deployed as detailed in the report.
4. Readings with 'Malfunction' listed were taken down for servicing and therefore no data was reported.

Dust Monitor Summary
South Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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.
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
South Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
12/5/2012	South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty percent of the instantaneous exceedances occurred before or after working hours. While only the above listed monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were present at all monitors. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/11/2012	South	Ninety-five percent of instantaneous exceedances occurred in the evening, after working hours. Dust suppression was implemented as necessary during working hours. An evening inversion layer settled in at night and trapped widespread and offsite particulate matter. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/13/2012	South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. All instantaneous exceedances occurred before or after working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/18/2012	South	A cold front entered the El Paso area creating an inversion layer in the evening after working hours. Instantaneous dust concentration exceedances began after 5:00PM and continued throughout the evening. While only the above listed monitors show daily average dust concentrations greater than the sentinel value all monitors had instantaneous exceedances throughout the evening. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/19/2012	South	Wind gusts up to 62 mph were present in the El Paso area with an average wind speed of 21 mph prevailing from the west. Due to the high winds widespread dust was present in the area from 8:00AM to 4:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/20/2012	South	An early morning inversion layer settled in the El Paso area before and after working hours which trapped offsite and widespread particulate matter. The inversion layer dispersed by 11:00AM and settled in again after 6:00PM. The highest instantaneous dust concentration exceedances occurred between 7:00PM and 10:30PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/10/2013	South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-six percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 15 $\mu g/m^3$ for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/16/2013	South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-one percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 12 $\mu g/m^3$ for this monitor was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/18/2013	South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty-seven percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 19 $\mu g/m^3$ for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/19/2013	South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-nine percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 18 $\mu g/m^3$ for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

Dust Monitor Summary
West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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.
12/5/2012	West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty percent of the instantaneous exceedances occurred before or after working hours. While only the above listed monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were present at all monitors. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/11/2012	West	Ninety-five percent of instantaneous exceedances occurred in the evening, after working hours. Dust suppression was implemented as necessary during working hours. An evening inversion layer settled in at night and trapped widespread and offsite particulate matter. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/12/2012	West	An inversion layer settled into the El Paso region in the evening on December 11th, dissipated by noon on December 12th, and then settled back in the area by early evening. Widespread and offsite particulate matter was trapped by this inversion, which resulted in instantaneous dust exceedances with the highest readings occurring from 4:00PM to 11:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

Dust Monitor Summary
North West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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.
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 West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
12/19/2012	North West	Wind gusts up to 62 mph were present in the El Paso area with an average wind speed of 21 mph prevailing from the west. Due to the high winds widespread dust was present in the area from 8:00AM to 4:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/20/2012	North West	An early morning inversion layer settled in the El Paso area before and after working hours which trapped offsite and widespread particulate matter. The inversion layer dispersed by 11:00AM and settled in again after 6:00PM. The highest instantaneous dust concentration exceedances occurred between 7:00PM and 10:30PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/18/2013	North West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty-seven percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 19 $\mu g/m^3$ for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/19/2013	North West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-nine percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 18 $\mu g/m^3$ for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological 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.
12/12/2012	North	An inversion layer settled into the El Paso region in the evening on December 11th, dissipated by noon on December 12th, and then settled back in the area by early evening. Widespread and offsite particulate matter was trapped by this inversion, which resulted in instantaneous dust exceedances with the highest readings occurring from 4:00PM to 11:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/18/2012	North	A cold front entered the El Paso area creating an inversion layer in the evening after working hours. Instantaneous dust concentration exceedances began after 5:00PM and continued throughout the evening. While only the above listed monitors show daily average dust concentrations greater than the sentinel value all monitors had instantaneous exceedances throughout the evening. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/19/2012	North	Wind gusts up to 62 mph were present in the El Paso area with an average wind speed of 21 mph prevailing from the west. Due to the high winds widespread dust was present in the area from 8:00AM to 4:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/19/2013	North	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-nine percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 18 µg/m ^{3} for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

Dust Monitor Summary
North East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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 $\mu g/m^3$.
12/19/2012	North East	Wind gusts up to 62 mph were present in the El Paso area with an average wind speed of 21 mph prevailing from the west. Due to the high winds widespread dust was present in the area from 8:00AM to 4:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/19/2013	North East	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-nine percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 18 $\mu g/m^3$ for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

Dust Monitor Summary
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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.
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.

Dust Monitor Summary
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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 $\mu g/m^3$ which is at the site-specific sentinel value of 43 $\mu g/m^3$.
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 $\mu g/m^3$ 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.
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 $\mu g/m^3$ 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.
12/13/2012	East	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. All instantaneous exceedances occurred before or after working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/19/2012	East	Wind gusts up to 62 mph were present in the El Paso area with an average wind speed of 21 mph prevailing from the west. Due to the high winds widespread dust was present in the area from 8:00AM to 4:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/20/2012	East	An early morning inversion layer settled in the El Paso area before and after working hours which trapped offsite and widespread particulate matter. The inversion layer dispersed by 11:00AM and settled in again after 6:00PM. The highest instantaneous dust concentration exceedances occurred between 7:00PM and 10:30PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

Dust Monitor Summary
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
1/10/2013	East	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-six percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 15 µg/m ^{3} for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/18/2013	East	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty-seven percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 19 µg/m ^{3} for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/19/2013	East	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-nine percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 18 µg/m ^{3} for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/23/2013	East	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty-eight percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 21 µg/m ^{3} for this monitor was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

Dust Monitor Summary
Calavera Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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.
1/19/2013	Calavera	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-nine percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 18 $\mu g/m^3$ for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

Dust Monitor Summary
Arroyo West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

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

Dust Monitor Summary
Arroyo West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
12/5/2012	Arroyo West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty percent of the instantaneous exceedances occurred before or after working hours. While only the above listed monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were present at all monitors. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/11/2012	Arroyo West	Ninety-five percent of instantaneous exceedances occurred in the evening, after working hours. Dust suppression was implemented as necessary during working hours. An evening inversion layer settled in at night and trapped widespread and offsite particulate matter. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/13/2012	Arroyo West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. All instantaneous exceedances occurred before or after working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/18/2012	Arroyo West	A cold front entered the El Paso area creating an inversion layer in the evening after working hours. Instantaneous dust concentration exceedances began after 5:00PM and continued throughout the evening. While only the above listed monitors show daily average dust concentrations greater than the sentinel value all monitors had instantaneous exceedances throughout the evening. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/19/2012	Arroyo West	Wind gusts up to 62 mph were present in the El Paso area with an average wind speed of 21 mph prevailing from the west. Due to the high winds widespread dust was present in the area from 8:00AM to 4:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/20/2012	Arroyo West	An early morning inversion layer settled in the El Paso area before and after working hours which trapped offsite and widespread particulate matter. The inversion layer dispersed by 11:00AM and settled in again after 6:00PM. The highest instantaneous dust concentration exceedances occurred between 7:00PM and 10:30PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/10/2013	Arroyo West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-six percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 15 µg/m ^{3} for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/18/2013	Arroyo West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty-seven percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 19 µg/m ^{3} for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/19/2013	Arroyo West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-nine percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 18 µg/m ^{3} for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/21/2013	Arroyo West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-seven percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 23 µg/m ^{3} for this monitor was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

Dust Monitor Summary
Arroyo West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
1/23/2013	Arroyo West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty-eight percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 21 µg/m ^{3} for this monitor was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological 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.
12/5/2012	Arroyo South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty percent of the instantaneous exceedances occurred before or after working hours. While only the above listed monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were present at all monitors. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/11/2012	Arroyo South	Ninety-five percent of instantaneous exceedances occurred in the evening, after working hours. Dust suppression was implemented as necessary during working hours. An evening inversion layer settled in at night and trapped widespread and offsite particulate matter. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/13/2012	Arroyo South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. All instantaneous exceedances occurred before or after working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/18/2012	Arroyo South	A cold front entered the El Paso area creating an inversion layer in the evening after working hours. Instantaneous dust concentration exceedances began after 5:00PM and continued throughout the evening. While only the above listed monitors show daily average dust concentrations greater than the sentinel value all monitors had instantaneous exceedances throughout the evening. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/19/2012	Arroyo South	Wind gusts up to 62 mph were present in the El Paso area with an average wind speed of 21 mph prevailing from the west. Due to the high winds widespread dust was present in the area from 8:00AM to 4:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/20/2012	Arroyo South	An early morning inversion layer settled in the El Paso area before and after working hours which trapped offsite and widespread particulate matter. The inversion layer dispersed by 11:00AM and settled in again after 6:00PM. The highest instantaneous dust concentration exceedances occurred between 7:00PM and 10:30PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/5/2013	Arroyo South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty-three percent of the instantaneous exceedances occurred in the evening or early morning, outside working hours. A light freezing fog was present from 9AM to 11AM which contributes to higher readings in the air monitors due to the presence of water vapor. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 32 µg/m^3 for this monitor was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/19/2013	Arroyo South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-nine percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 18 µg/m^3 for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

Dust Monitor Summary
Arroyo North Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
4/14/2012	Arroyo North	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.
4/26/2012	Arroyo North	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions.
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 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$.
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 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$.
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 $\mu g/m^3$ which is at the site-specific sentinel value of 43 $\mu g/m^3$.
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 North Elevated Data Summary

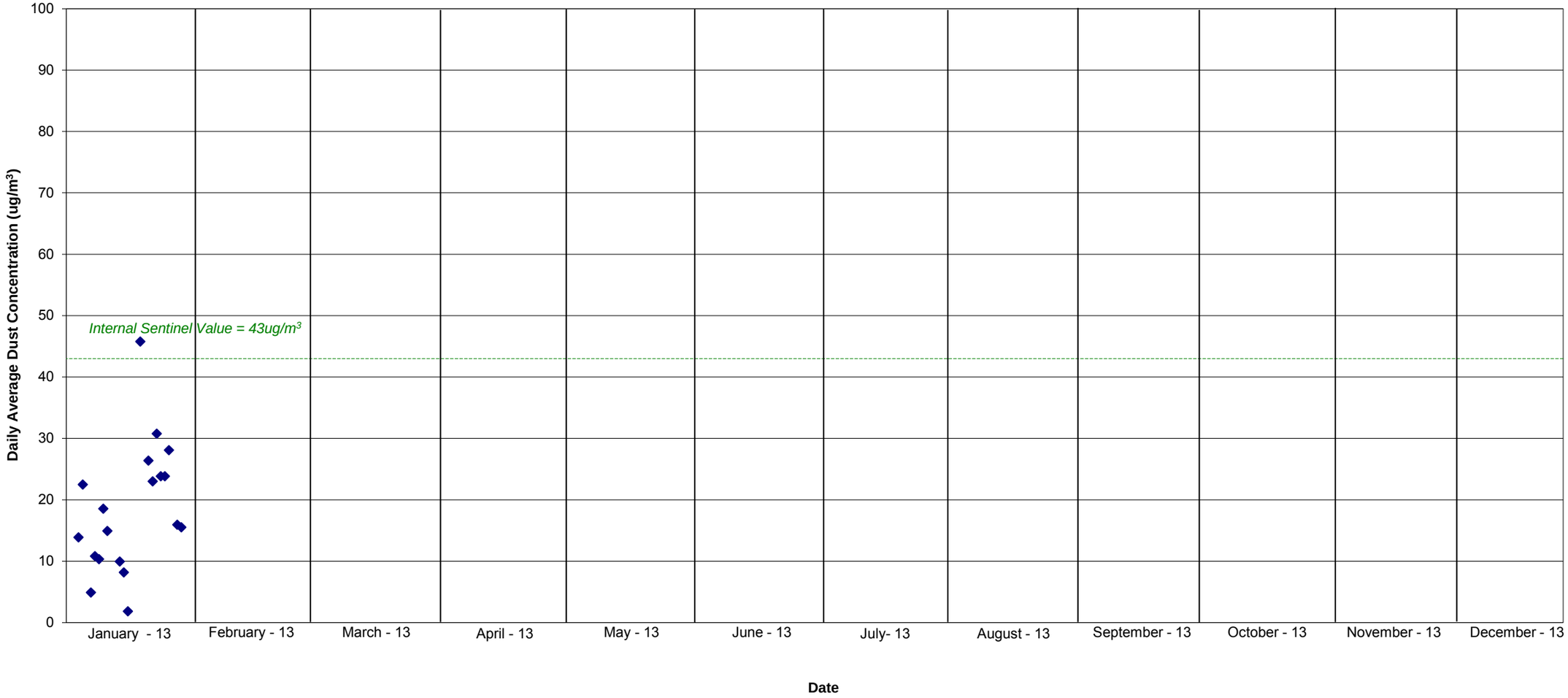
Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
12/11/2012	Arroyo North	Ninety-five percent of instantaneous exceedances occurred in the evening, after working hours. Dust suppression was implemented as necessary during working hours. An evening inversion layer settled in at night and trapped widespread and offsite particulate matter. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/13/2012	Arroyo North	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. All instantaneous exceedances occurred before or after working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/19/2012	Arroyo North	Wind gusts up to 62 mph were present in the El Paso area with an average wind speed of 21 mph prevailing from the west. Due to the high winds widespread dust was present in the area from 8:00AM to 4:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/20/2012	Arroyo North	An early morning inversion layer settled in the El Paso area before and after working hours which trapped offsite and widespread particulate matter. The inversion layer dispersed by 11:00AM and settled in again after 6:00PM. The highest instantaneous dust concentration exceedances occurred between 7:00PM and 10:30PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/19/2013	Arroyo North	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-nine percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 18 µg/m ^{3} for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

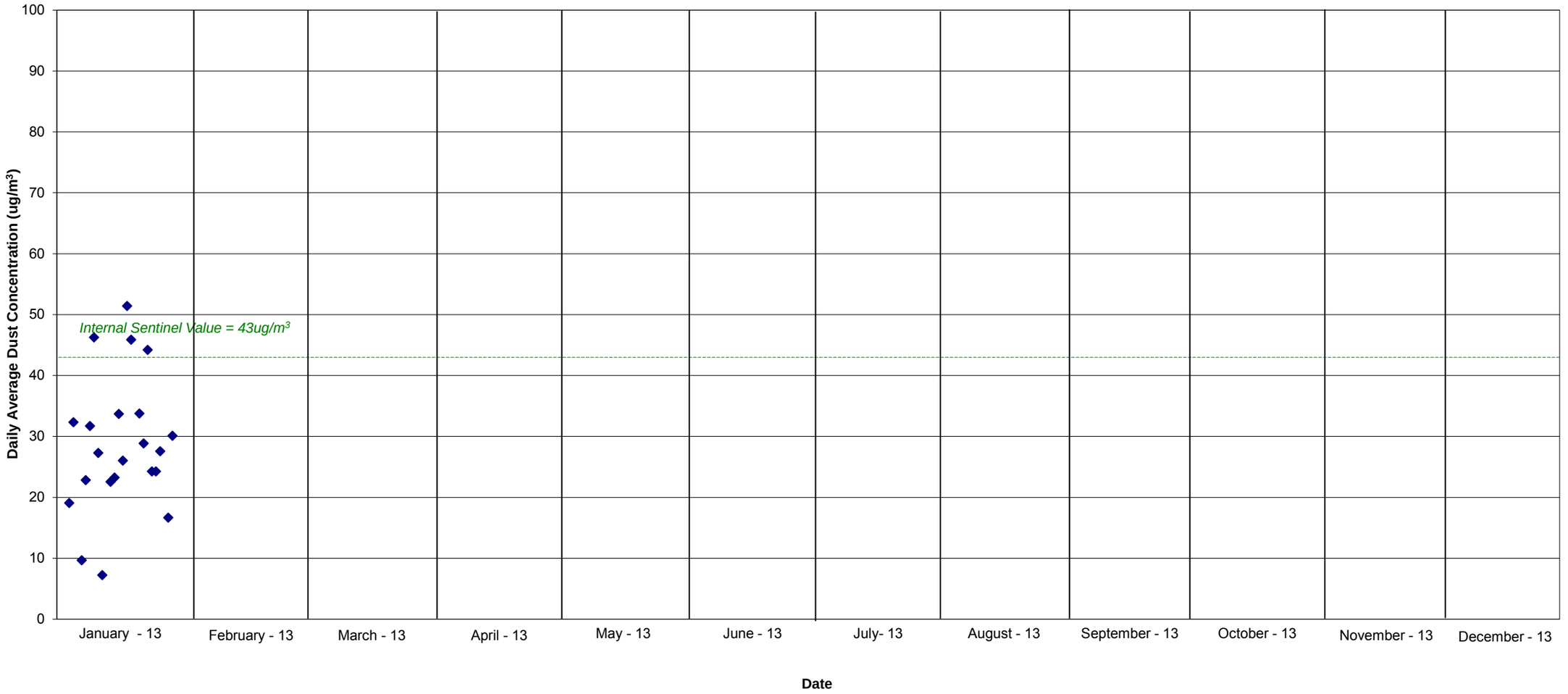
Attachment D

Dust Concentration Graphs

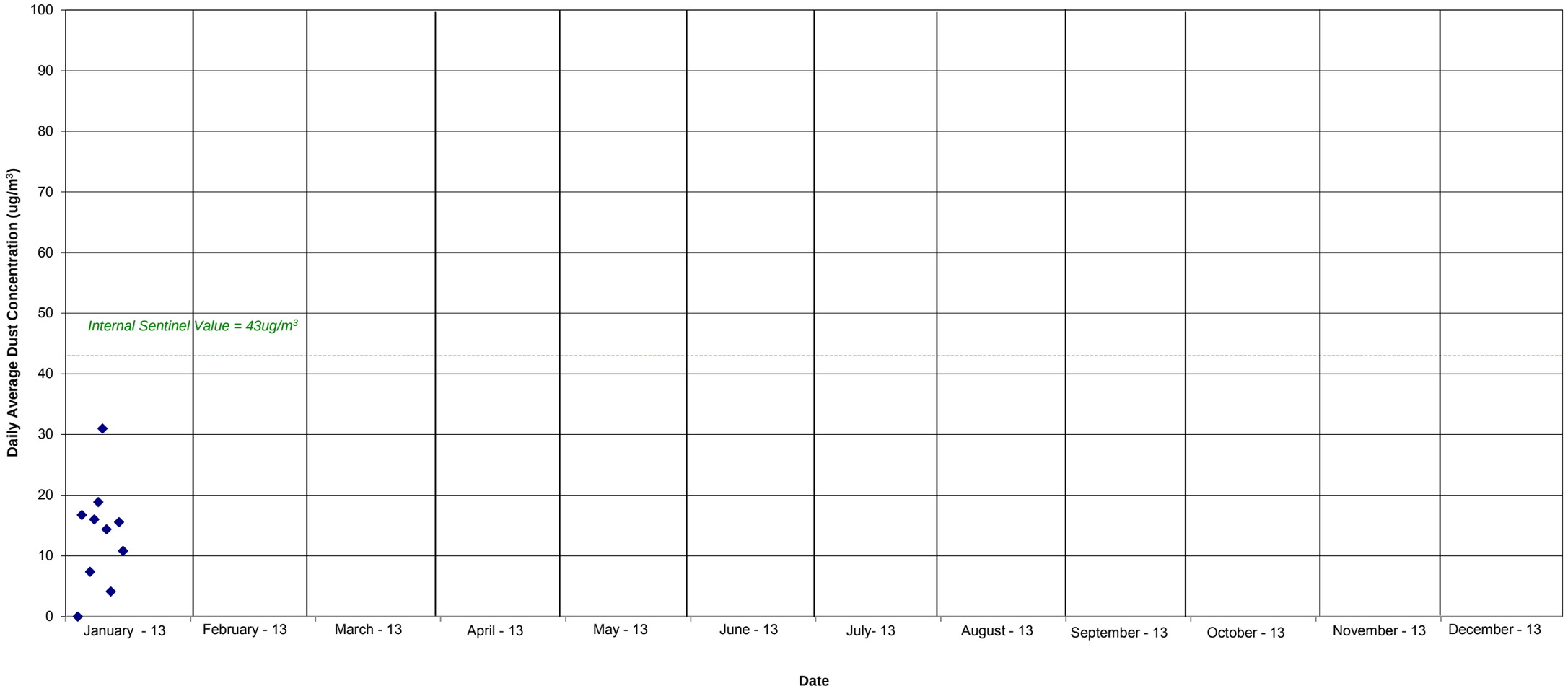
2013 Dust Monitor Summary
Calavera Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



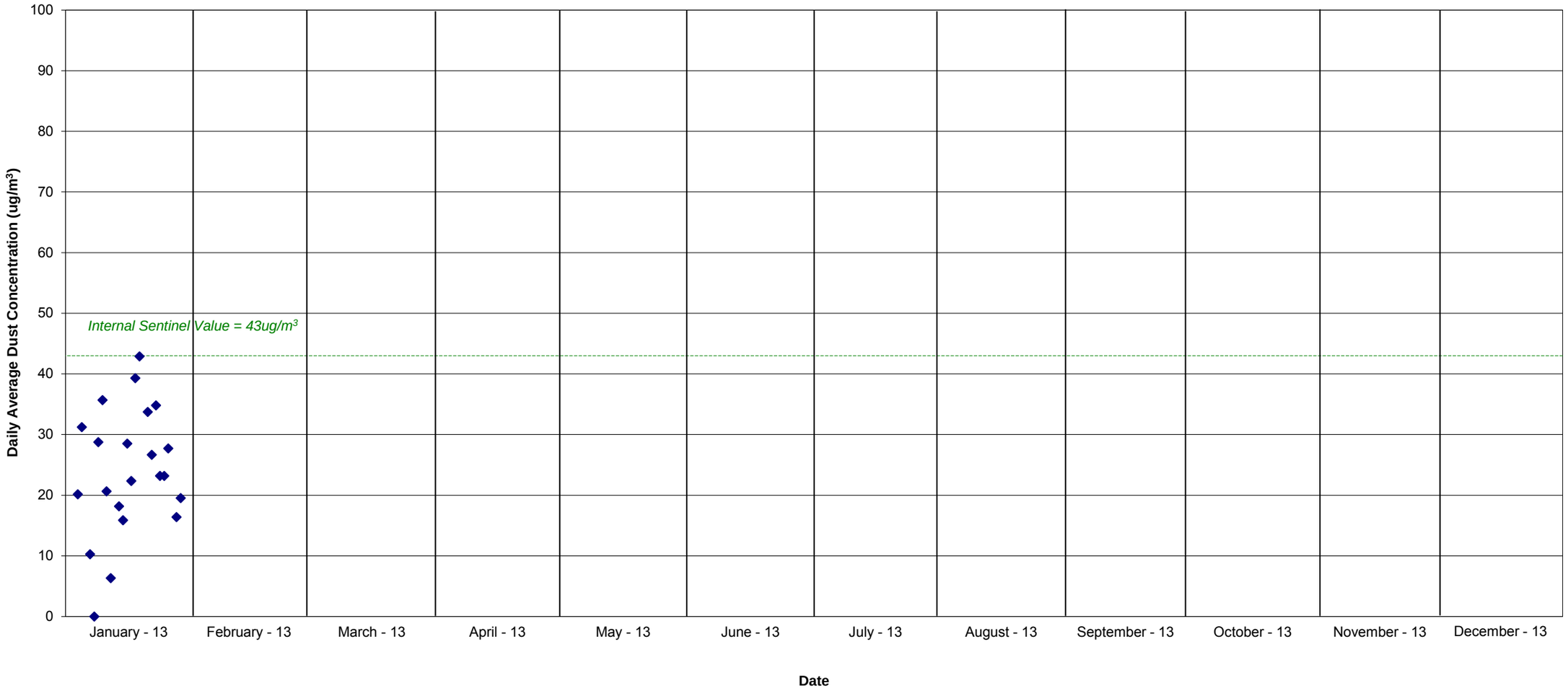
2013 Dust Monitor Summary
East Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



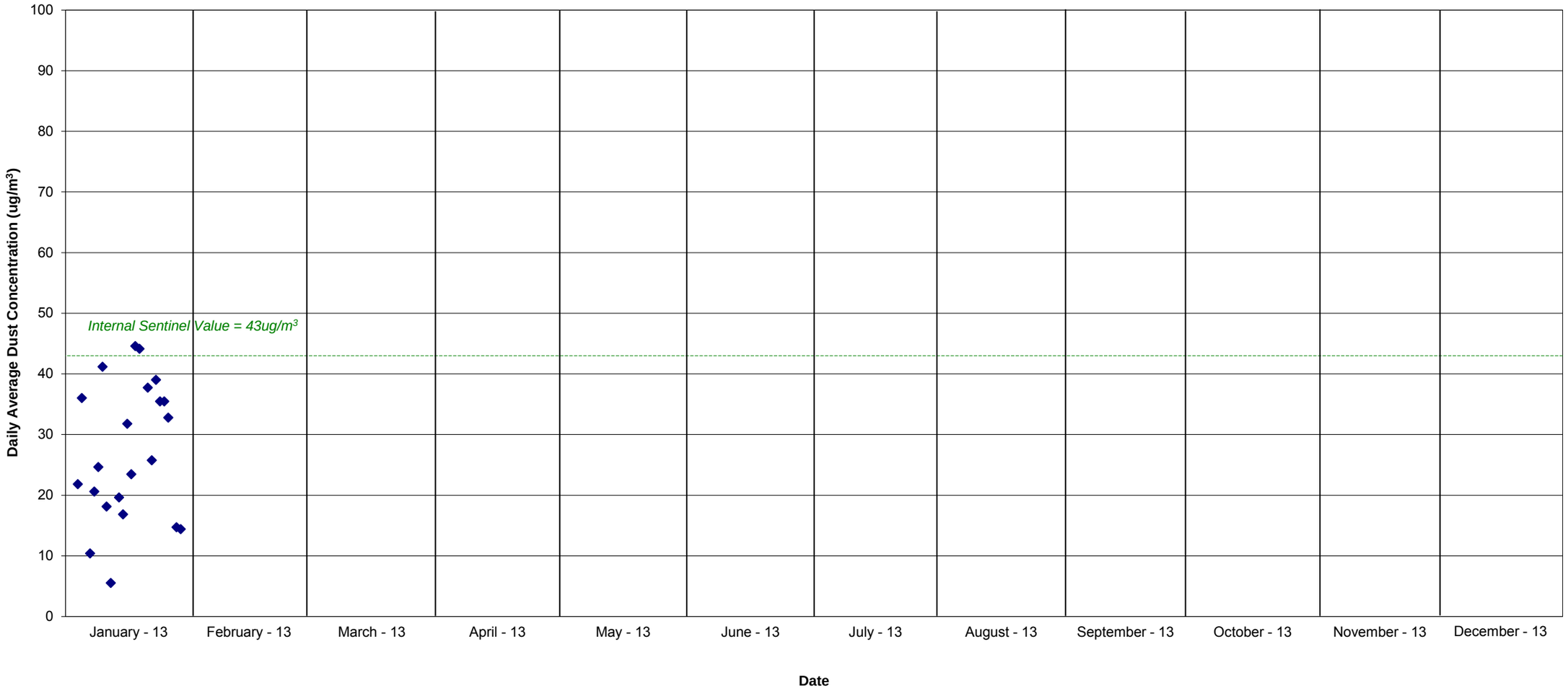
2013 Dust Monitor Summary
North Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



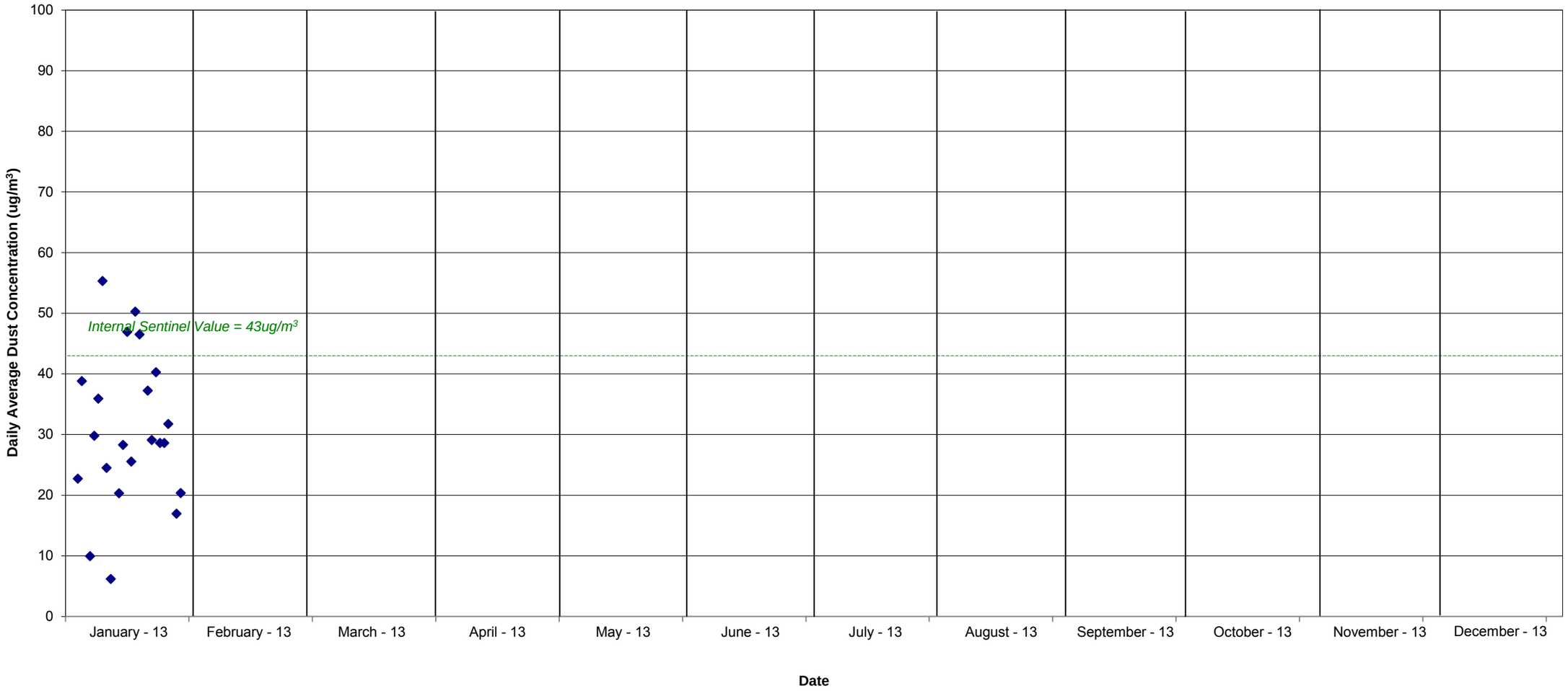
2013 Dust Monitor Summary
North East Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



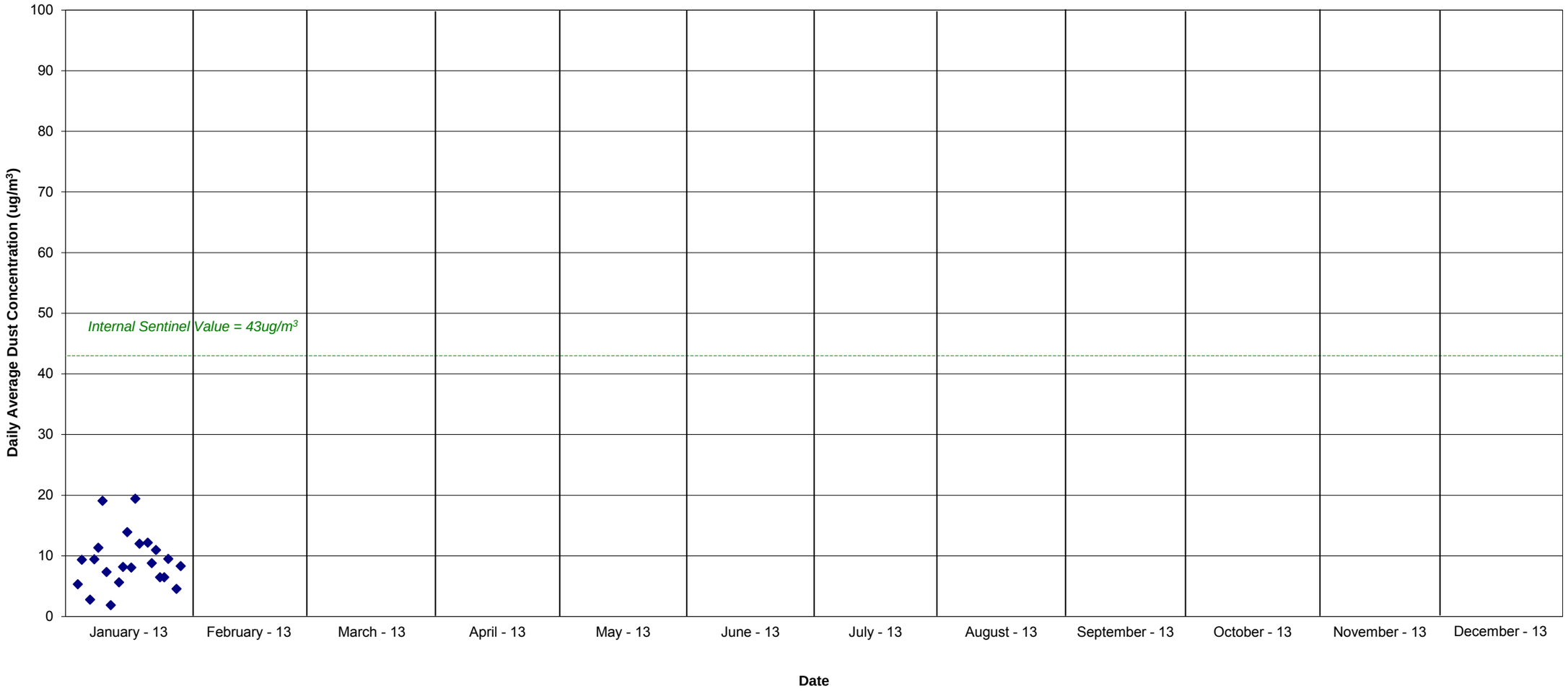
2013 Dust Monitor Summary
North West Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



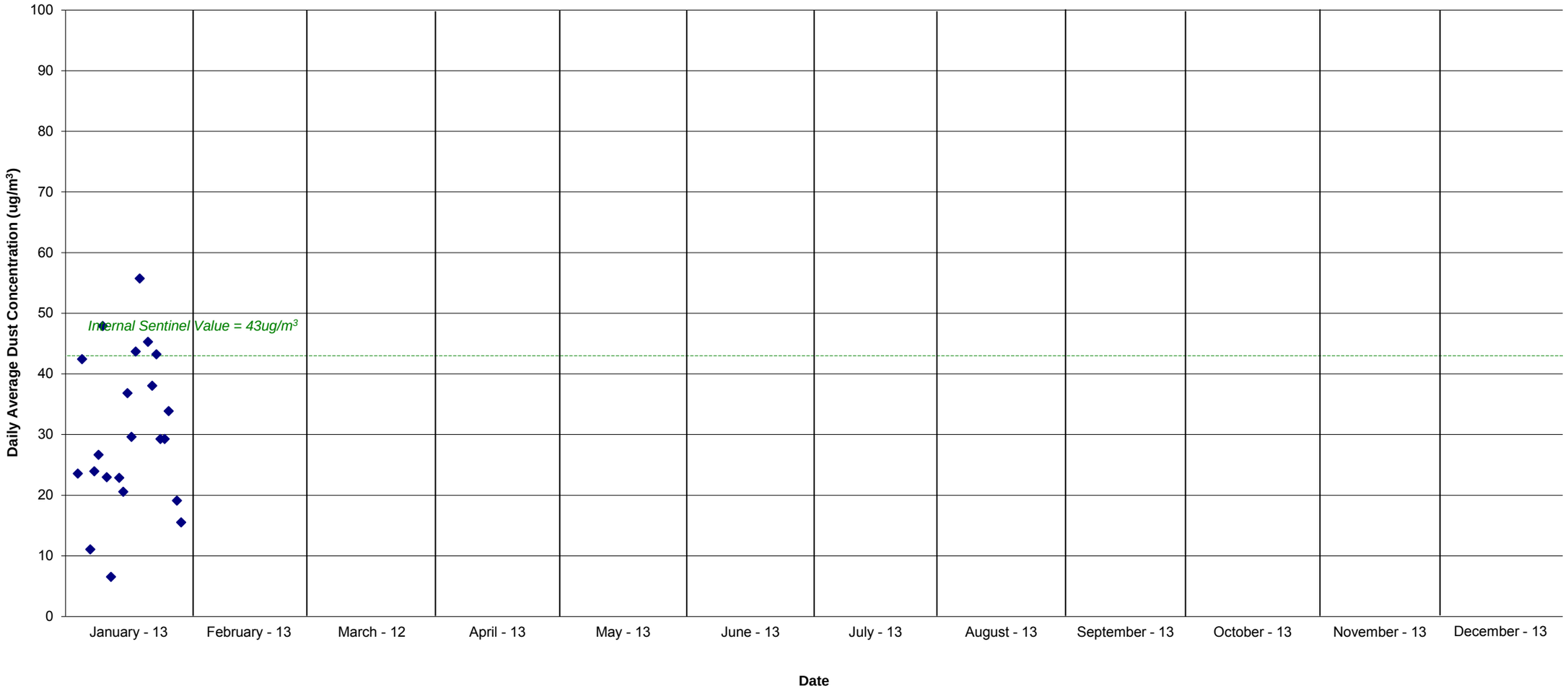
2013 Dust Monitor Summary
South Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



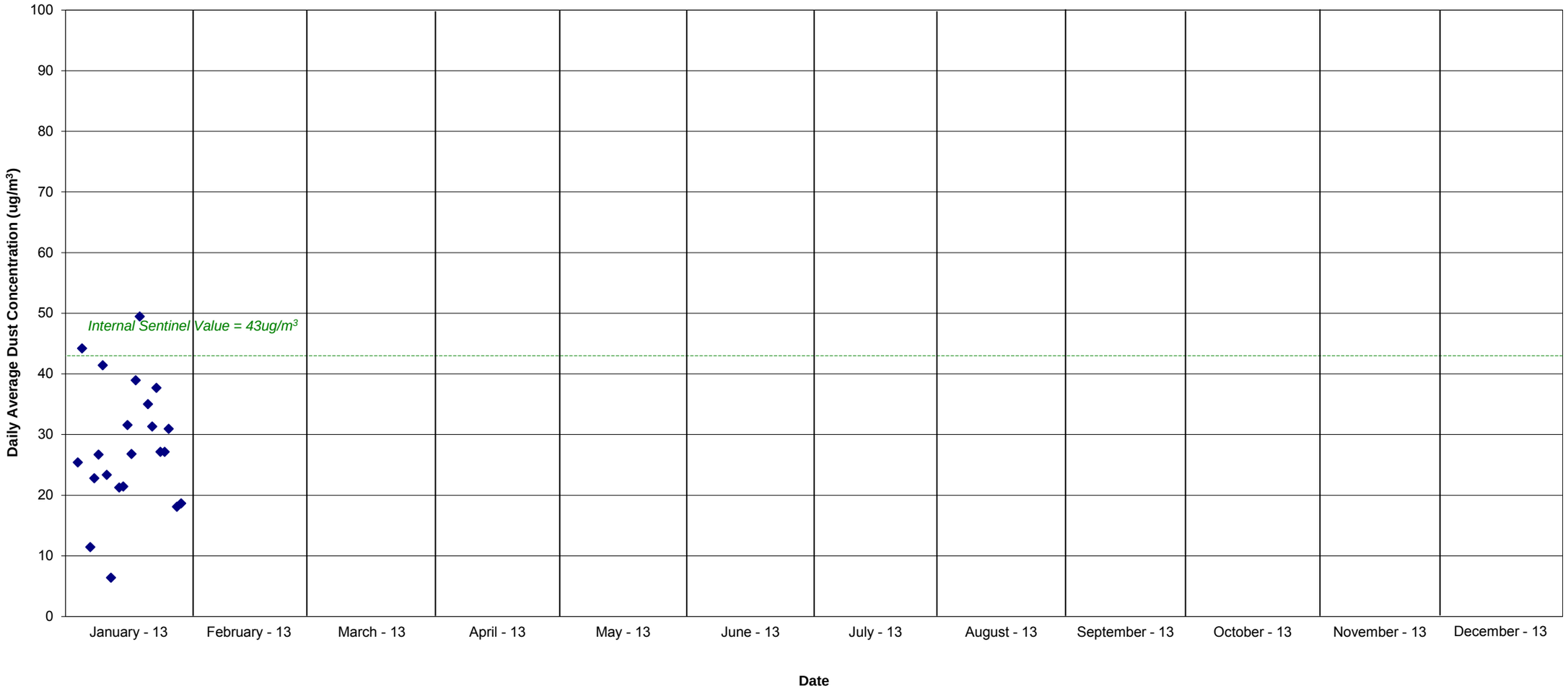
2013 Dust Monitor Summary
West Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



2013 Dust Monitor Summary
Arroyo West Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



2013 Dust Monitor Summary
Arroyo South Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



2013 Dust Monitor Summary
Arroyo North Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas