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May 14, 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: April 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 April 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 for the chimney demolition on April 13th was conducted and is provided in a separate report which can be viewed on the project website (www.recastingthesmelter.com). In addition to the dust monitoring report for the chimney demolition a separate memo documenting the results of chemical monitoring, before, during and after the demolition is currently being prepared for the Trust.

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. 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 April 6th. Field staff made the necessary repairs to the unit and it was online and fully operational on April 8th. MP-4 transmitted a flow error again on April 16th and was brought back on line and fully operational by April 18th, after field staff made repairs. MP-6

monitor which is positioned in the North Location was not deployed on April 14th due to the previous day's chimney demolition when it was used in a different location. Accordingly, as presented in Attachment C, Table 2, readings for MP-4 (Calavera) are represented by 'ND' for 'not deployed' for the dates the monitor was not functioning properly.

DUST MONITORING DATA RESULTS & SUMMARY

A summary of the April elevated dust data is provided in Attachment C, Table 1, and the April daily average dust concentration data is provided in Attachment C, Table 2. The Sunday prior to the chimney demolition event (April 6th) and the Sunday immediately following the chimney demolition event (April 14th) the demolition team was present on site conducting pre-and post-chimney demolition activities as indicated in Attachment C, Table 2. Days where no construction activities were present are colored grey in Attachment C, Table 2. Data for the dust monitoring conducted during the chimney demolition on April 13th is presented in a separate report as previously indicated. Data for the chimney demolition began on Friday April 12th and continued through Saturday April 13th for the expanded monitoring network. 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 $\mu g/m^3$ at all dust monitoring locations during the month of April with the following exceptions:

April 8th – The daily average dust concentration for all locations except West, North and Arroyo North monitors was greater than the sentinel value.

National Weather Service issued a blowing dust and high wind advisory for the El Paso region. A large storm system generating strong winds was present all day and into the evening. West to southwest winds had sustained speeds around 35 to 45 mph. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

April 9th – The daily average dust concentration for all locations except the West monitor location was greater than the sentinel value.

National Weather Service issued a wind advisory for the El Paso region. A deep low pressure system with a cold front moved across the region generating strong winds in the morning and into the afternoon. West winds were sustained at speeds ranging from 25 to 35 mph with gusts around 50 mph. Blowing dusts reduced visibility to less than one mile. A background dust evaluation was conducted on the elevated data using the upwind (West, Arroyo West and North West) monitor locations. Subtracting the daily average background dust concentration at the

upwind location from the daily average dust concentration for the North East, East, and Arroyo South (downwind) locations resulted in the actual average dust generated on site to be 26 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

April 17th – The daily average dust concentration for all locations was greater than the sentinel value.

National Weather Service issued a high wind warning and blowing dust advisory for the El Paso region which began on April 16 and lasted until April 18. The weather pattern generated strong west southwest winds with sustained speeds of 25 to 40 mph with gusts around 56 mph. Widespread blowing dust was present throughout the area. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

April 19th – The daily average dust concentration for the Arroyo West monitor was greater than the sentinel value.

The National Weather Service (NWS) issued a Wind Advisory for West Texas from 5:00 AM to 7:00 PM. Potential damaging winds were advised. Southwest winds averaged 31 mph with gusts up to 39 mph. While only the East monitor had daily average dust concentration exceeding the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (West and South) monitor locations and downwind (Arroyo South and East) locations. Subtracting the daily average background dust concentration at the upwind locations from the daily average dust concentration for the downwind locations resulted in the actual average dust generated on site to be 20 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

April 20th – The daily average dust concentration for the Arroyo West monitor was greater than the sentinel value.

The National Weather Service (NWS) issued a High Wind Warning and Blowing Dust Advisory for West Texas from 8:00 AM to 9:00 PM. Strong afternoon winds from west were present. Winds averaged 23 mph with gusts up to 47 mph. While only the above listed monitors had daily average dust concentration exceeding the sentinel value, all monitors displayed high readings

during these times. A background dust evaluation was conducted on the elevated data using the upwind (North West and West) monitor locations and downwind (North East and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind locations from the daily average dust concentration for the downwind locations resulted in the actual average dust generated on site to be 14 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

April 24th – The daily average dust concentration for the Calavera monitor was greater than the sentinel value.

Wind gusts up to 25 mph were present in the area with an average wind speed of 7 mph prevailing from the east southeast. A background dust evaluation was conducted on the elevated data using the upwind (East, North East and Arroyo South) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo West and North West (downwind) locations resulted in the actual average dust generated on site to be 12 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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

Attachment B

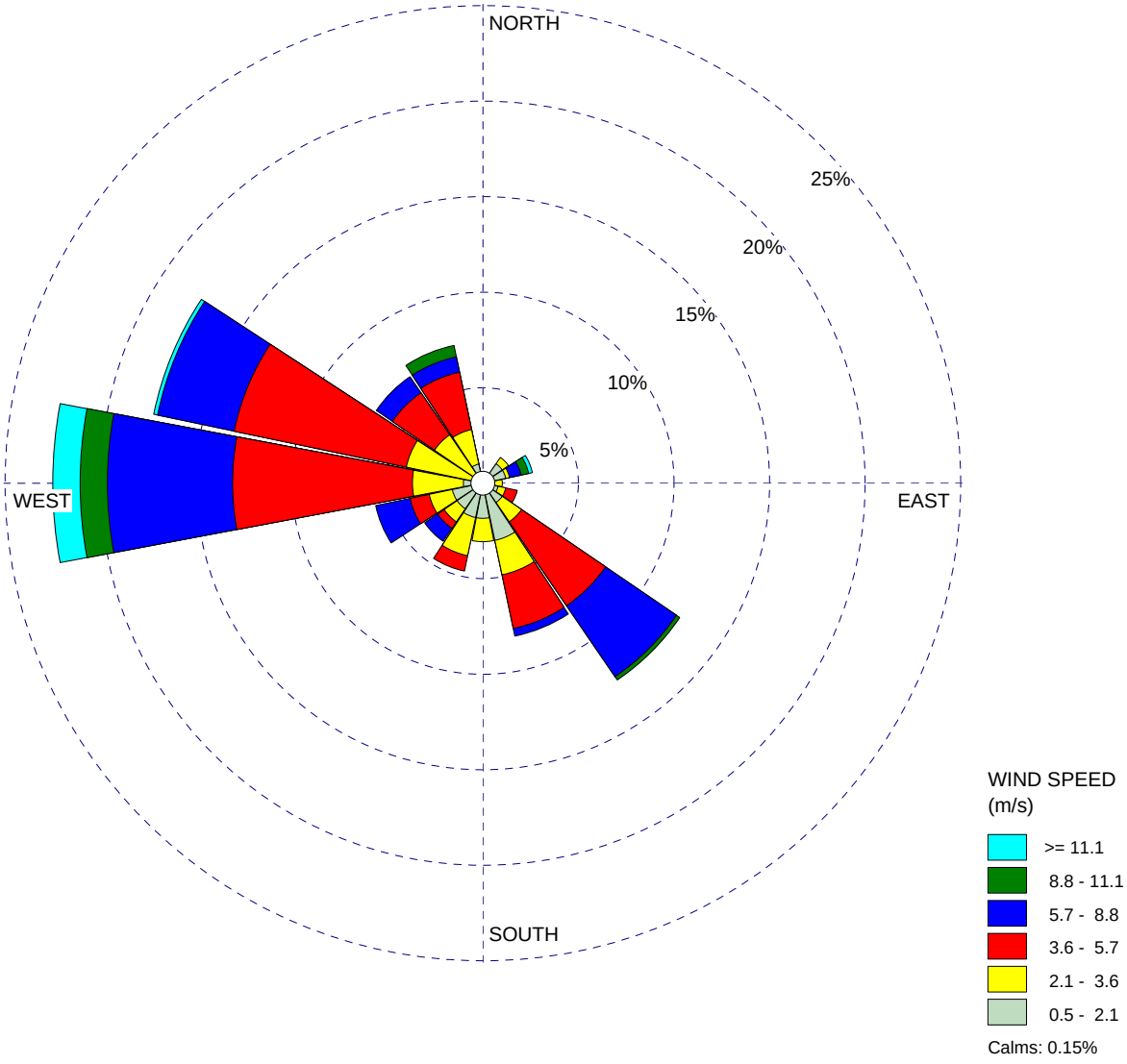
Wind Rose Plots

WIND ROSE PLOT:

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

DISPLAY:

Wind Speed
Direction (blowing from)



COMMENTS:	DATA PERIOD: **Start Date: 4/1/2013 - 00:00** **End Date: 4/30/2013 - 22:00**	COMPANY NAME: **Malcolm Pirnie, Inc**	
		MODELER: **Karina E Correa**	
	CALM WINDS: **0.15%**	TOTAL COUNT: **490 hrs.**	
	AVG. WIND SPEED: **4.47 m/s**	DATE: **5/1/2013**	PROJECT NO.: **06835001.2012**

Attachment C

Tables

TABLE 1

April Elevated Dust Monitor Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Except as noted below, daily average dust readings were below the site-specific internal sentinel value of 43 µg/m^3.

Date	Location	Maximum Average Reading (µg/m^3)	Comments	Action
4/8/2013	All Except West, North, Arroyo North	85	National Weather Service issued a blowing dust and high wind advisory for the El Paso region. A large storm system generating strong winds was present all day and into the evening. West to southwest winds had sustained speeds around 35 to 45 mph. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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.
4/9/2013	All Except West	89	National Weather Service issued a wind advisory for the El Paso region. A deep low pressure system with a cold front moved across the region generating strong winds in the morning and into the afternoon. West winds were sustained at speeds ranging from 25 to 35 mph with gusts around 50 mph. Blowing dusts reduced visibility to less than one mile. A background dust evaluation was conducted on the elevated data using the upwind (West, Arroyo West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North East, East, and Arroyo South (downwind) locations resulted in the actual average dust generated on site to be 26 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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.
4/17/2013	All	131	National Weather Service issued a high wind warning and blowing dust advisory for the El Paso region which began on April 16 and lasted until April 18. The weather pattern generated strong west southwest winds with sustained speeds of 25 to 40 mph with gusts around 56 mph. Widespread blowing dust was present throughout the area. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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

April Elevated Dust Monitor Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Except as noted below, daily average dust readings were below the site-specific internal sentinel value of 43 µg/m^3.

Date	Location	Maximum Average Reading (µg/m^3)	Comments	Action
4/19/2013	Arroyo West	67	The National Weather Service (NWS) issued a Wind Advisory for West Texas from 5:00 AM to 7:00 PM. Potential damaging winds were advised. Southwest winds averaged 31 mph with gusts up to 39 mph. While only the East monitor had daily average dust concentration exceeding the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (West and South) monitor locations and downwind (Arroyo South and East) locations. Subtracting the daily average background dust concentration at the upwind locations from the daily average dust concentration for the downwind locations resulted in the actual average dust generated on site to be 20 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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.
4/20/2013	Arroyo West	75	The National Weather Service (NWS) issued a High Wind Warning and Blowing Dust Advisory for West Texas from 8:00 AM to 9:00 PM. Strong afternoon winds from west were present. Winds averaged 23 mph with gusts up to 47 mph. While only the above listed monitors had daily average dust concentration exceeding the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (North West and West) monitor locations and downwind (North East and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind locations from the daily average dust concentration for the downwind locations resulted in the actual average dust generated on site to be 14 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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.
4/24/2013	Calavera	50	Wind gusts up to 25 mph were present in the area with an average wind speed of 7 mph prevailing from the east southeast. A background dust evaluation was conducted on the elevated data using the upwind (East, North East and Arroyo South) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo West and North West (downwind) locations resulted in the actual average dust generated on site to be 12 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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

April Daily Average Dust Monitoring Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Week ending April 7th							
Date	Monday, April 01, 2013	Tuesday, April 02, 2013	Wednesday, April 03, 2013	Thursday, April 04, 2013	Friday, April 05, 2013	Saturday, April 06, 2013	Sunday, April 07, 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 ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)
South	10	12	22	27	16	12	10
West	5	6	8	8	6	5	5
East	12	16	24	27	19	13	14
North	7	10	19	19	11	7	8
North East	17	21	22	21	14	10	11
North West	11	14	28	24	30	10	10
Calavera	9	12	28	22	17	ND	ND
Arroyo West	12	19	28	28	22	13	13
Arroyo South	12	14	27	32	15	12	11
Arroyo North	5	7	16	16	9	5	6
Week ending April 14th							
Date	Monday, April 08, 2013	Tuesday, April 09, 2013	Wednesday, April 10, 2013	Thursday, April 11, 2013	Friday, April 12, 2013	Saturday, April 13, 2013	Sunday, April 14, 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 ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)
South	44	75	9	7			13
West	23	27	4	7			23
East	70	81	14	13			23
North	42	49	7	7			ND
North East	64	81	10	7			15
North West	59	78	11	8			13
Calavera	85	81	10	9			12
Arroyo West	60	80	13	10			17
Arroyo South	63	89	11	7			8
Arroyo North	36	44	5	5			10
Week ending April 21st							
Date	Monday, April 15, 2013	Tuesday, April 16, 2013	Wednesday, April 17, 2013	Thursday, April 18, 2013	Friday, April 19, 2013	Saturday, April 20, 2013	Sunday, April 21, 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 ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)
South	16	22	74	5	13	14	
West	29	33	131	10	24	24	
East	35	30	125	9	20	23	
North	22	20	72	5	10	19	
North East	26	27	120	7	14	20	
North West	22	23	96	7	16	21	
Calavera	8	ND	ND	10	15	20	
Arroyo West	23	27	112	10	67	75	
Arroyo South	11	14	56	4	8	9	
Arroyo North	15	17	74	4	10	14	
Week ending April 28th							
Date	Monday, April 22, 2013	Tuesday, April 23, 2013	Wednesday, April 24, 2013	Thursday, April 25, 2013	Friday, April 26, 2013	Saturday, April 27, 2013	Sunday, April 28, 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 ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)
South	10	16	18	21	14	18	
West	16	28	29	32	16	26	
East	15	29	27	29	13	21	
North	10	19	20	29	10	17	
North East	11	25	26	32	10	18	
North West	11	20	28	40	9	20	
Calavera	11	28	50	41	9	19	
Arroyo West	32	37	38	38	13	41	
Arroyo South	6	11	9	14	5	8	
Arroyo North	7	18	18	21	6	13	
Week ending May 5th							
Date	Monday, April 29, 2013	Tuesday, April 30, 2013	Wednesday, May 01, 2013	Thursday, May 02, 2013	Friday, May 03, 2013	Saturday, May 04, 2013	Sunday, May 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 ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)
South	19	8					
West	30	13					
East	31	12					
North	19	11					
North East	21	11					
North West	21	11					
Calavera	21	11					
Arroyo West	30	15					
Arroyo South	16	5					
Arroyo North	15	7					

NOTES:

1. Readings indicate PM_{10} dust based on direct read monitoring from TSI DustTrak II equipment.
2. Grey cell indicates that continuous dust monitoring was not conducted that day because there were no demolition or remediation activities that day. April 12th and April 13th are marked with grey cells because of the chimney demolition activities which are represented in a seperate report.
3. ND indicates that monitor was not deployed as detailed in the report.
4. Readings with 'Malfunction' listed were taken down for servicing and therefore no data was reported.

Dust Monitor Summary
South Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
5/23/2012	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.
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.

Dust Monitor Summary
South Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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 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.
1/16/2013	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 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.
1/18/2013	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 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	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.
2/20/2013	South	The National Weather Service (NWS) issued a High Wind Warning and Blowing Dust Advisory for El Paso County from noon to 7:00PM. Potential damaging winds were advised. Limited precipitation was associated with this event with some light rain and a possible dusting of snow for the area. Strong southwest winds and widespread blowing dust were present. Southwest winds averaged 32 mph with gusts up to 47 mph. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

Dust Monitor Summary
South Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
4/8/2013	South	National Weather Service issued a blowing dust and high wind advisory for the El Paso region. A large storm system generating strong winds was present all day and into the evening. West to southwest winds had sustained speeds around 35 to 45 mph. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m3 which is below the site-specific sentinel value of 43 µg/m3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/9/2013	South	National Weather Service issued a wind advisory for the El Paso region. A deep low pressure system with a cold front moved across the region generating strong winds in the morning and into the afternoon. West winds were sustained at speeds ranging from 25 to 35 mph with gusts around 50 mph. Blowing dusts reduced visibility to less than one mile. A background dust evaluation was conducted on the elevated data using the upwind (West, Arroyo West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North East, East, and Arroyo South (downwind) locations resulted in the actual average dust generated on site to be 26 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/17/2013	South	National Weather Service issued a high wind warning and blowing dust advisory for the El Paso region which began on April 16 and lasted until April 18. The weather pattern generated strong west southwest winds with sustained speeds of 25 to 40 mph with gusts around 56 mph. Widespread blowing dust was present throughout the area. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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
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.
4/17/2013	West	National Weather Service issued a high wind warning and blowing dust advisory for the El Paso region which began on April 16 and lasted until April 18. The weather pattern generated strong west southwest winds with sustained speeds of 25 to 40 mph with gusts around 56 mph. Widespread blowing dust was present throughout the area. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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
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.
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.

Dust Monitor Summary
North West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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 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	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 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.
2/20/2013	North West	The National Weather Service (NWS) issued a High Wind Warning and Blowing Dust Advisory for El Paso County from noon to 7:00PM. Potential damaging winds were advised. Limited precipitation was associated with this event with some light rain and a possible dusting of snow for the area. Strong southwest winds and widespread blowing dust were present. Southwest winds averaged 32 mph with gusts up to 47 mph. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/8/2013	North West	National Weather Service issued a blowing dust and high wind advisory for the El Paso region. A large storm system generating strong winds was present all day and into the evening. West to southwest winds had sustained speeds around 35 to 45 mph. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m3 which is below the site-specific sentinel value of 43 µg/m3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/9/2013	North West	National Weather Service issued a wind advisory for the El Paso region. A deep low pressure system with a cold front moved across the region generating strong winds in the morning and into the afternoon. West winds were sustained at speeds ranging from 25 to 35 mph with gusts around 50 mph. Blowing dusts reduced visibility to less than one mile. A background dust evaluation was conducted on the elevated data using the upwind (West, Arroyo West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North East, East, and Arroyo South (downwind) locations resulted in the actual average dust generated on site to be 26 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/17/2013	North West	National Weather Service issued a high wind warning and blowing dust advisory for the El Paso region which began on April 16 and lasted until April 18. The weather pattern generated strong west southwest winds with sustained speeds of 25 to 40 mph with gusts around 56 mph. Widespread blowing dust was present throughout the area. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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
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 $\mu g/m^3$ 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.
2/20/2013	North	The National Weather Service (NWS) issued a High Wind Warning and Blowing Dust Advisory for El Paso County from noon to 7:00PM. Potential damaging winds were advised. Limited precipitation was associated with this event with some light rain and a possible dusting of snow for the area. Strong southwest winds and widespread blowing dust were present. Southwest winds averaged 32 mph with gusts up to 47 mph. 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
4/9/2013	North	National Weather Service issued a wind advisory for the El Paso region. A deep low pressure system with a cold front moved across the region generating strong winds in the morning and into the afternoon. West winds were sustained at speeds ranging from 25 to 35 mph with gusts around 50 mph. Blowing dusts reduced visibility to less than one mile. A background dust evaluation was conducted on the elevated data using the upwind (West, Arroyo West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North East, East, and Arroyo South (downwind) locations resulted in the actual average dust generated on site to be 26 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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
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.
2/9/2013	North East	Widespread dust was present in the El Paso area from 11:00 AM to 5:00 PM with wind gusts peaking at 48 mph and an average wind speed of 23 mph prevailing from the northwest. While only the above listed monitors had daily average dust concentrations which exceeded the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (North West and Arroyo West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo South, North East and East (downwind) locations resulted in the actual average dust generated on site to be 21 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. 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
2/20/2013	North East	The National Weather Service (NWS) issued a High Wind Warning and Blowing Dust Advisory for El Paso County from noon to 7:00PM. Potential damaging winds were advised. Limited precipitation was associated with this event with some light rain and a possible dusting of snow for the area. Strong southwest winds and widespread blowing dust were present. Southwest winds averaged 32 mph with gusts up to 47 mph. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/4/2013	North East	Widespread dust was present in the El Paso area from 12:00 PM to 6:00 PM with wind gusts peaking at 48 mph and an average wind speed of 59 mph prevailing from the southwest. While only the above listed monitors had daily average dust concentrations which exceeded the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (South) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North (downwind) locations resulted in the actual average dust generated on site to be 13 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/23/2013	North East	The National Weather Service (NWS) issued a High Wind Warning and Blowing Dust Advisory for West Texas from 8:00 AM to 9:00 PM. Strong afternoon winds from west were present. Winds averaged 23 mph with gusts up to 47 mph. While only the above listed monitors had daily average dust concentration exceeding the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (North West and West) monitor locations and downwind (North East and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind locations from the daily average dust concentration for the downwind locations resulted in the actual average dust generated on site to be 14 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/8/2013	North East	National Weather Service issued a blowing dust and high wind advisory for the El Paso region. A large storm system generating strong winds was present all day and into the evening. West to southwest winds had sustained speeds around 35 to 45 mph. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m3 which is below the site-specific sentinel value of 43 µg/m3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/9/2013	North East	National Weather Service issued a wind advisory for the El Paso region. A deep low pressure system with a cold front moved across the region generating strong winds in the morning and into the afternoon. West winds were sustained at speeds ranging from 25 to 35 mph with gusts around 50 mph. Blowing dusts reduced visibility to less than one mile. A background dust evaluation was conducted on the elevated data using the upwind (West, Arroyo West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North East, East, and Arroyo South (downwind) locations resulted in the actual average dust generated on site to be 26 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/17/2013	North East	National Weather Service issued a high wind warning and blowing dust advisory for the El Paso region which began on April 16 and lasted until April 18. The weather pattern generated strong west southwest winds with sustained speeds of 25 to 40 mph with gusts around 56 mph. Widespread blowing dust was present throughout the area. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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
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.
11/7/2012	East	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.
11/10/2012	East	Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. A background dust evaluation was conducted on the elevated data using the upwind (West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the two downwind locations resulted in the actual dust generated on site to be 43 µg/m^3 which is at the site-specific sentinel value of 43 µg/m^3.

Dust Monitor Summary
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

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

Dust Monitor Summary
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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.
2/9/2013	East	Widespread dust was present in the El Paso area from 11:00 AM to 5:00 PM with wind gusts peaking at 48 mph and an average wind speed of 23 mph prevailing from the northwest. While only the above listed monitors had daily average dust concentrations which exceeded the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (North West and Arroyo West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo South, North East and East (downwind) locations resulted in the actual average dust generated on site to be 21 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
2/16/2013	East	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. The prevailing wind was from the south. For the above monitors, seventy-five 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 30 µg/m^3 for these monitors was below the site-specific sentinel value. Additionally, 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 Arroyo South, Arroyo North and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 9 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
2/20/2013	East	The National Weather Service (NWS) issued a High Wind Warning and Blowing Dust Advisory for El Paso County from noon to 7:00PM. Potential damaging winds were advised. Limited precipitation was associated with this event with some light rain and a possible dusting of snow for the area. Strong southwest winds and widespread blowing dust were present. Southwest winds averaged 32 mph with gusts up to 47 mph. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/4/2013	East	Widespread dust was present in the El Paso area from 12:00 PM to 6:00 PM with wind gusts peaking at 48 mph and an average wind speed of 59 mph prevailing from the southwest. While only the above listed monitors had daily average dust concentrations which exceeded the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (South) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North (downwind) locations resulted in the actual average dust generated on site to be 13 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/21/2013	East	The National Weather Service (NWS) issued a Wind Advisory for West Texas from 5:00 AM to 7:00 PM. Potential damaging winds were advised. Southwest winds averaged 31 mph with gusts up to 39 mph. While only the East monitor had daily average dust concentration exceeding the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (West and South) monitor locations and downwind (Arroyo South and East) locations. Subtracting the daily average background dust concentration at the upwind locations from the daily average dust concentration for the downwind locations resulted in the actual average dust generated on site to be 20 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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
3/23/2013	East	The National Weather Service (NWS) issued a High Wind Warning and Blowing Dust Advisory for West Texas from 8:00 AM to 9:00 PM. Strong afternoon winds from west were present. Winds averaged 23 mph with gusts up to 47 mph. While only the above listed monitors had daily average dust concentration exceeding the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (North West and West) monitor locations and downwind (North East and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind locations from the daily average dust concentration for the downwind locations resulted in the actual average dust generated on site to be 14 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/8/2013	East	National Weather Service issued a blowing dust and high wind advisory for the El Paso region. A large storm system generating strong winds was present all day and into the evening. West to southwest winds had sustained speeds around 35 to 45 mph. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m3 which is below the site-specific sentinel value of 43 µg/m3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/9/2013	East	National Weather Service issued a wind advisory for the El Paso region. A deep low pressure system with a cold front moved across the region generating strong winds in the morning and into the afternoon. West winds were sustained at speeds ranging from 25 to 35 mph with gusts around 50 mph. Blowing dusts reduced visibility to less than one mile. A background dust evaluation was conducted on the elevated data using the upwind (West, Arroyo West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North East, East, and Arroyo South (downwind) locations resulted in the actual average dust generated on site to be 26 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/17/2013	East	National Weather Service issued a high wind warning and blowing dust advisory for the El Paso region which began on April 16 and lasted until April 18. The weather pattern generated strong west southwest winds with sustained speeds of 25 to 40 mph with gusts around 56 mph. Widespread blowing dust was present throughout the area. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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 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.
2/20/2013	Calavera	The National Weather Service (NWS) issued a High Wind Warning and Blowing Dust Advisory for El Paso County from noon to 7:00PM. Potential damaging winds were advised. Limited precipitation was associated with this event with some light rain and a possible dusting of snow for the area. Strong southwest winds and widespread blowing dust were present. Southwest winds averaged 32 mph with gusts up to 47 mph. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/8/2013	Calavera	National Weather Service issued a blowing dust and high wind advisory for the El Paso region. A large storm system generating strong winds was present all day and into the evening. West to southwest winds had sustained speeds around 35 to 45 mph. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m3 which is below the site-specific sentinel value of 43 µg/m3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/9/2013	Calavera	National Weather Service issued a wind advisory for the El Paso region. A deep low pressure system with a cold front moved across the region generating strong winds in the morning and into the afternoon. West winds were sustained at speeds ranging from 25 to 35 mph with gusts around 50 mph. Blowing dusts reduced visibility to less than one mile. A background dust evaluation was conducted on the elevated data using the upwind (West, Arroyo West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North East, East, and Arroyo South (downwind) locations resulted in the actual average dust generated on site to be 26 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/17/2013	Calavera	National Weather Service issued a high wind warning and blowing dust advisory for the El Paso region which began on April 16 and lasted until April 18. The weather pattern generated strong west southwest winds with sustained speeds of 25 to 40 mph with gusts around 56 mph. Widespread blowing dust was present throughout the area. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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
4/24/2013	Calavera	Wind gusts up to 25 mph were present in the area with an average wind speed of 7 mph prevailing from the east southeast. A background dust evaluation was conducted on the elevated data using the upwind (East, North East and Arroyo South) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo West and North West (downwind) locations resulted in the actual average dust generated on site to be 12 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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	Widespread dust was present in the El Paso area from 11:00 AM to 5:00 PM with wind gusts peaking at 48 mph and an average wind speed of 23 mph prevailing from the northwest. While only the above listed monitors had daily average dust concentrations which exceeded the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (North West and Arroyo West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo South, North East and East (downwind) locations resulted in the actual
6/15/2012	Arroyo West	Wind gust speeds up to 66 mph were present in the El Paso area from the early afternoon hours until the evening hours causing elevated dust concentrations at downwind monitoring locations. The prevailing wind direction that day was from the northwest. A background dust evaluation was conducted on the elevated data using the upwind (North West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East (downwind) location resulted in the actual dust generated on site to be 17 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3.
11/1/2012	Arroyo West	Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20˚F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions. The elevated dust concentrations for the day are attributed to off-site conditions.
11/2/2012	Arroyo West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions. The elevated dust concentrations for the day are attributed to off-site conditions.
11/10/2012	Arroyo West	Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. A background dust evaluation was conducted on the elevated data using the upwind (West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the two downwind locations resulted in the actual dust generated on site to be 43 µg/m^3 which is at the site-specific sentinel value of 43 µg/m^3.
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.

Dust Monitor Summary
Arroyo West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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 $\mu g/m^3$ 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.
1/18/2013	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 $\mu g/m^3$ 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	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 $\mu g/m^3$ 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.
1/21/2013	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 $\mu g/m^3$ 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.
1/23/2013	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 $\mu g/m^3$ 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.

Dust Monitor Summary
Arroyo West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
2/9/2013	Arroyo West	Widespread dust was present in the El Paso area from 11:00 AM to 5:00 PM with wind gusts peaking at 48 mph and an average wind speed of 23 mph prevailing from the northwest. While only the above listed monitors had daily average dust concentrations which exceeded the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (North West and Arroyo West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo South, North East and East (downwind) locations resulted in the actual average dust generated on site to be 21 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
2/16/2013	Arroyo West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. The prevailing wind was from the south. For the above monitors, seventy-five 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 30 µg/m^3 for these monitors was below the site-specific sentinel value. Additionally, 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 Arroyo South, Arroyo North and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 9 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
2/20/2013	Arroyo West	The National Weather Service (NWS) issued a High Wind Warning and Blowing Dust Advisory for El Paso County from noon to 7:00PM. Potential damaging winds were advised. Limited precipitation was associated with this event with some light rain and a possible dusting of snow for the area. Strong southwest winds and widespread blowing dust were present. Southwest winds averaged 32 mph with gusts up to 47 mph. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/4/2013	Arroyo West	Widespread dust was present in the El Paso area from 12:00 PM to 6:00 PM with wind gusts peaking at 48 mph and an average wind speed of 59 mph prevailing from the southwest. While only the above listed monitors had daily average dust concentrations which exceeded the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (South) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North (downwind) locations resulted in the actual average dust generated on site to be 13 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/14/2013	Arroyo West	Wind gusts peaked at 12 mph and an average wind speed of 3 mph prevailing from the northeast. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo North) monitor location and downwind (North West) location. Subtracting the daily average background dust concentration at the Arroyo North location from the daily average dust concentration for the North West location resulted in the actual average dust generated on site to be 9 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/23/2013	Arroyo West	The National Weather Service (NWS) issued a High Wind Warning and Blowing Dust Advisory for West Texas from 8:00 AM to 9:00 PM. Strong afternoon winds from west were present. Winds averaged 23 mph with gusts up to 47 mph. While only the above listed monitors had daily average dust concentration exceeding the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (North West and West) monitor locations and downwind (North East and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind locations from the daily average dust concentration for the downwind locations resulted in the actual average dust generated on site to be 14 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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
4/8/2013	Arroyo West	National Weather Service issued a blowing dust and high wind advisory for the El Paso region. A large storm system generating strong winds was present all day and into the evening. West to southwest winds had sustained speeds around 35 to 45 mph. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m3 which is below the site-specific sentinel value of 43 µg/m3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/9/2013	Arroyo West	National Weather Service issued a wind advisory for the El Paso region. A deep low pressure system with a cold front moved across the region generating strong winds in the morning and into the afternoon. West winds were sustained at speeds ranging from 25 to 35 mph with gusts around 50 mph. Blowing dusts reduced visibility to less than one mile. A background dust evaluation was conducted on the elevated data using the upwind (West, Arroyo West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North East, East, and Arroyo South (downwind) locations resulted in the actual average dust generated on site to be 26 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/17/2013	Arroyo West	National Weather Service issued a high wind warning and blowing dust advisory for the El Paso region which began on April 16 and lasted until April 18. The weather pattern generated strong west southwest winds with sustained speeds of 25 to 40 mph with gusts around 56 mph. Widespread blowing dust was present throughout the area. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/19/2013	Arroyo West	The National Weather Service (NWS) issued a Wind Advisory for West Texas from 5:00 AM to 7:00 PM. Potential damaging winds were advised. Southwest winds averaged 31 mph with gusts up to 39 mph. While only the East monitor had daily average dust concentration exceeding the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (West and South) monitor locations and downwind (Arroyo South and East) locations. Subtracting the daily average background dust concentration at the upwind locations from the daily average dust concentration for the downwind locations resulted in the actual average dust generated on site to be 20 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/20/2013	Arroyo West	The National Weather Service (NWS) issued a High Wind Warning and Blowing Dust Advisory for West Texas from 8:00 AM to 9:00 PM. Strong afternoon winds from west were present. Winds averaged 23 mph with gusts up to 47 mph. While only the above listed monitors had daily average dust concentration exceeding the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (North West and West) monitor locations and downwind (North East and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind locations from the daily average dust concentration for the downwind locations resulted in the actual average dust generated on site to be 14 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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
4/14/2012	Arroyo South	Widespread dust was present in the El Paso area from 11:00 AM to 5:00 PM with wind gusts peaking at 48 mph and an average wind speed of 23 mph prevailing from the northwest. While only the above listed monitors had daily average dust concentrations which exceeded the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (North West and Arroyo West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo South, North East and East (downwind) locations resulted in the actual average dust generated on site to be 21 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological 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 µg/m^3 which is below the site-specific sentinel value of 43 µg/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.

Dust Monitor Summary
Arroyo South Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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.
2/9/2013	Arroyo South	Widespread dust was present in the El Paso area from 11:00 AM to 5:00 PM with wind gusts peaking at 48 mph and an average wind speed of 23 mph prevailing from the northwest. While only the above listed monitors had daily average dust concentrations which exceeded the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (North West and Arroyo West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo South, North East and East (downwind) locations resulted in the actual average dust generated on site to be 21 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
2/16/2013	Arroyo South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. The prevailing wind was from the south. For the above monitors, seventy-five 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 30 µg/m^3 for these monitors was below the site-specific sentinel value. Additionally, 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 Arroyo South, Arroyo North and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 9 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
2/20/2013	Arroyo South	The National Weather Service (NWS) issued a High Wind Warning and Blowing Dust Advisory for El Paso County from noon to 7:00PM. Potential damaging winds were advised. Limited precipitation was associated with this event with some light rain and a possible dusting of snow for the area. Strong southwest winds and widespread blowing dust were present. Southwest winds averaged 32 mph with gusts up to 47 mph. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/4/2013	Arroyo South	Widespread dust was present in the El Paso area from 12:00 PM to 6:00 PM with wind gusts peaking at 48 mph and an average wind speed of 59 mph prevailing from the southwest. While only the above listed monitors had daily average dust concentrations which exceeded the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (South) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North (downwind) locations resulted in the actual average dust generated on site to be 13 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/8/2013	Arroyo South	National Weather Service issued a blowing dust and high wind advisory for the El Paso region. A large storm system generating strong winds was present all day and into the evening. West to southwest winds had sustained speeds around 35 to 45 mph. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m3 which is below the site-specific sentinel value of 43 µg/m3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/9/2013	Arroyo South	National Weather Service issued a wind advisory for the El Paso region. A deep low pressure system with a cold front moved across the region generating strong winds in the morning and into the afternoon. West winds were sustained at speeds ranging from 25 to 35 mph with gusts around 50 mph. Blowing dusts reduced visibility to less than one mile. A background dust evaluation was conducted on the elevated data using the upwind (West, Arroyo West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North East, East, and Arroyo South (downwind) locations resulted in the actual average dust generated on site to be 26 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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
4/17/2013	Arroyo South	National Weather Service issued a high wind warning and blowing dust advisory for the El Paso region which began on April 16 and lasted until April 18. The weather pattern generated strong west southwest winds with sustained speeds of 25 to 40 mph with gusts around 56 mph. Widespread blowing dust was present throughout the area. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3.
6/15/2012	Arroyo North	Widespread dust was present in the El Paso area from 11:00 AM to 5:00 PM with wind gusts peaking at 48 mph and an average wind speed of 23 mph prevailing from the northwest. While only the above listed monitors had daily average dust concentrations which exceeded the sentinel value, all monitors displayed high readings during these times. A background dust evaluation was conducted on the elevated data using the upwind (North West and Arroyo West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo South, North East and East (downwind) locations resulted in the actual average dust generated on site to be 21 µg/m3 which is below the site-specific sentinel value of 43 µg/m3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
11/1/2012	Arroyo North	Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20˚F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions.
11/2/2012	Arroyo North	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.
11/10/2012	Arroyo North	Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. A background dust evaluation was conducted on the elevated data using the upwind (West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the two downwind locations resulted in the actual dust generated on site to be 43 µg/m^3 which is at the site-specific sentinel value of 43 µg/m^3.

Dust Monitor Summary
Arroyo North Elevated Data Summary

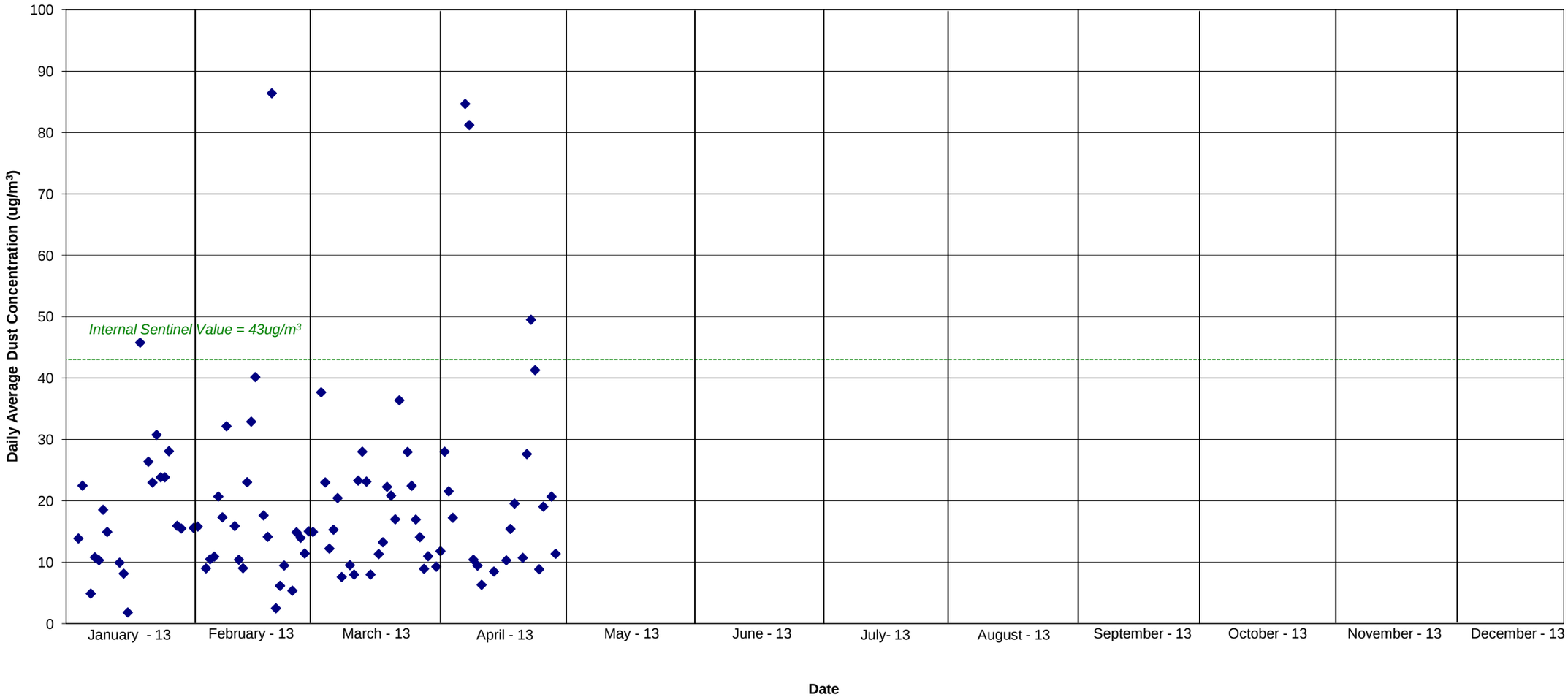
Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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.
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.
2/20/2013	Arroyo North	The National Weather Service (NWS) issued a High Wind Warning and Blowing Dust Advisory for El Paso County from noon to 7:00PM. Potential damaging winds were advised. Limited precipitation was associated with this event with some light rain and a possible dusting of snow for the area. Strong southwest winds and widespread blowing dust were present. Southwest winds averaged 32 mph with gusts up to 47 mph. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/9/2013	Arroyo North	National Weather Service issued a wind advisory for the El Paso region. A deep low pressure system with a cold front moved across the region generating strong winds in the morning and into the afternoon. West winds were sustained at speeds ranging from 25 to 35 mph with gusts around 50 mph. Blowing dusts reduced visibility to less than one mile. A background dust evaluation was conducted on the elevated data using the upwind (West, Arroyo West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North East, East, and Arroyo South (downwind) locations resulted in the actual average dust generated on site to be 26 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/17/2013	Arroyo North	National Weather Service issued a high wind warning and blowing dust advisory for the El Paso region which began on April 16 and lasted until April 18. The weather pattern generated strong west southwest winds with sustained speeds of 25 to 40 mph with gusts around 56 mph. Widespread blowing dust was present throughout the area. A background dust evaluation was conducted on the elevated data using the upwind (West and North West) monitor locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 23 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

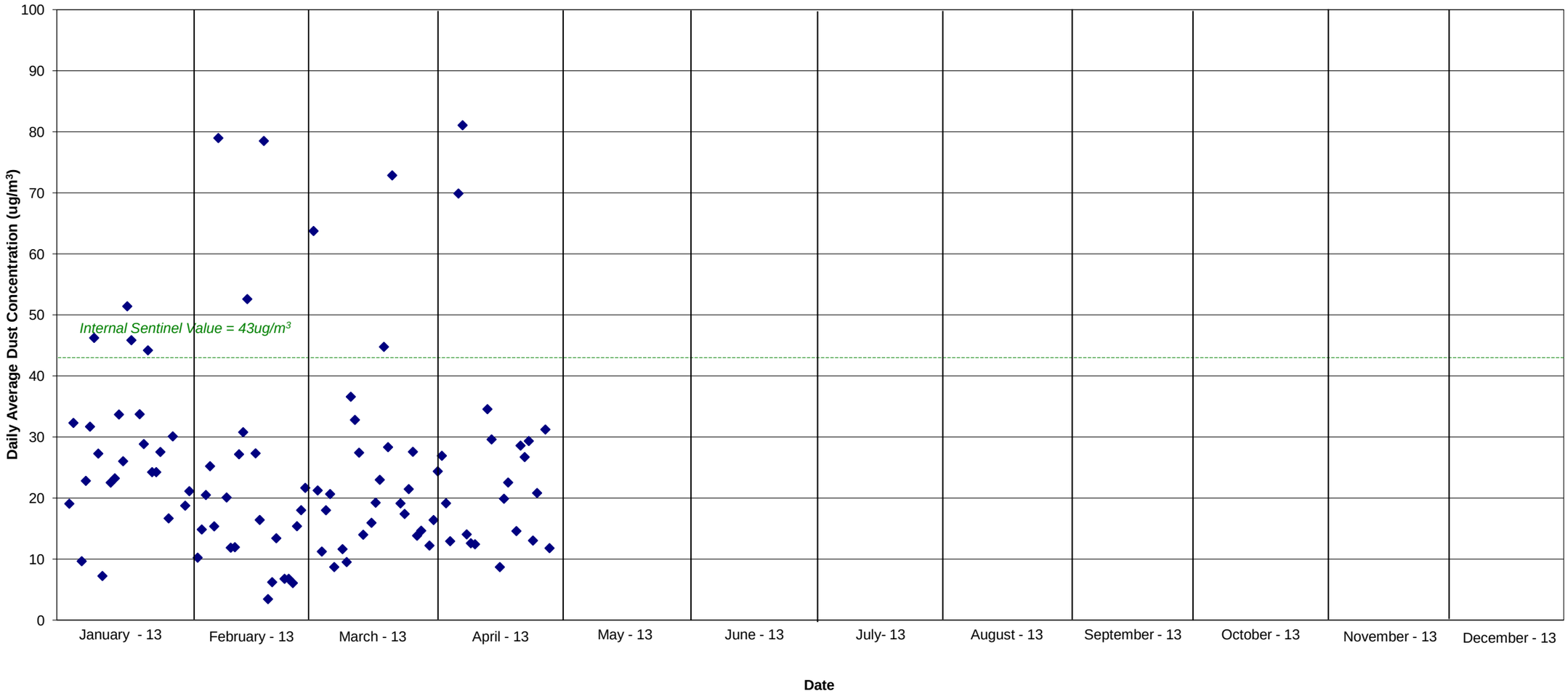
Attachment D

Dust Concentration Graphs

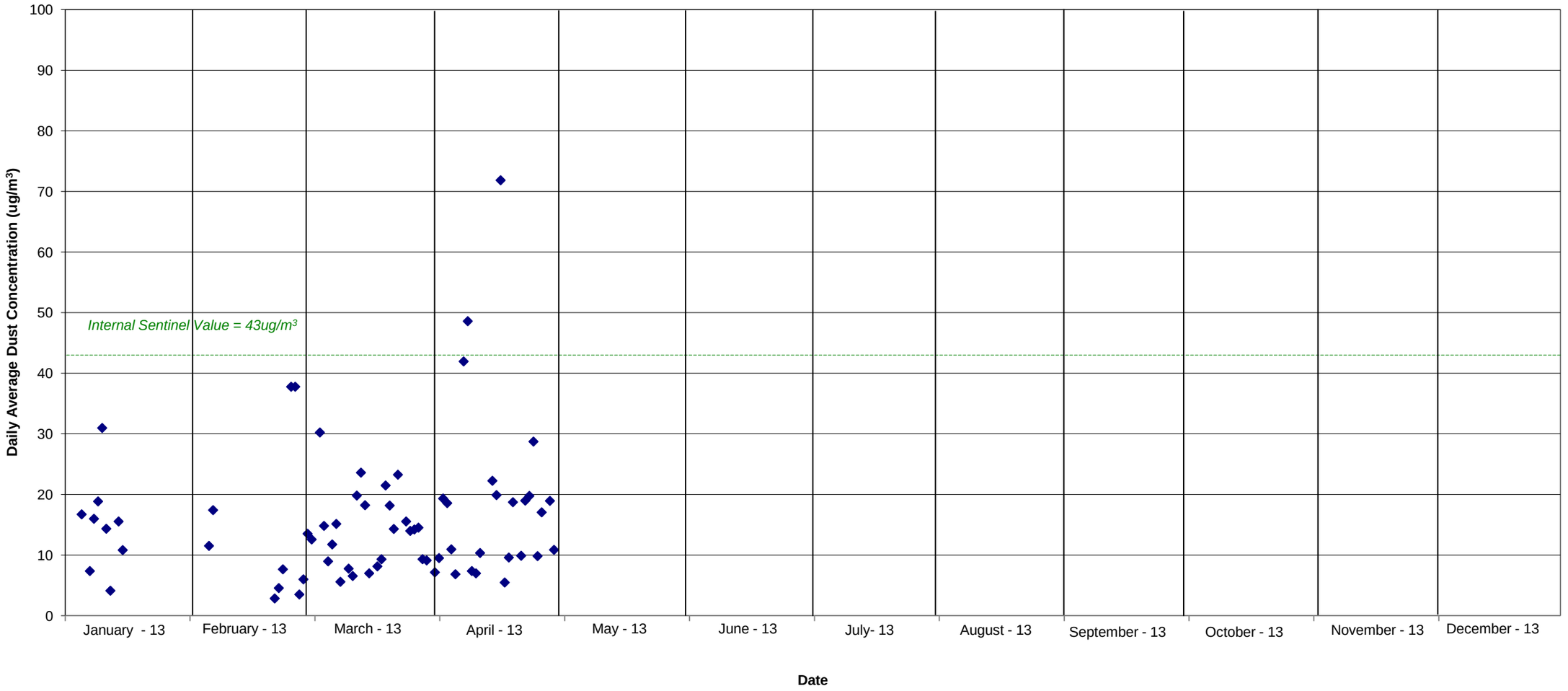
2013 Dust Monitor Summary
Calavera Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas



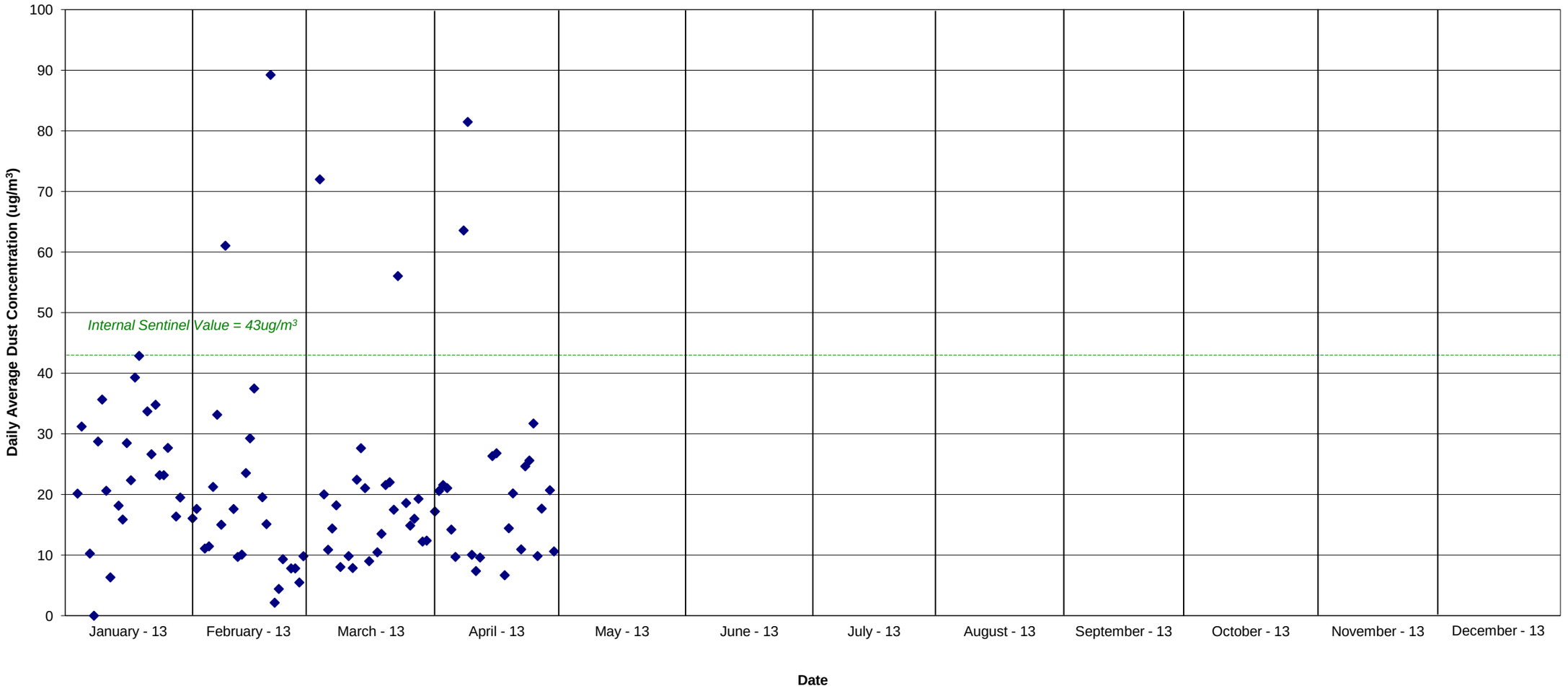
2013 Dust Monitor Summary
East Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas



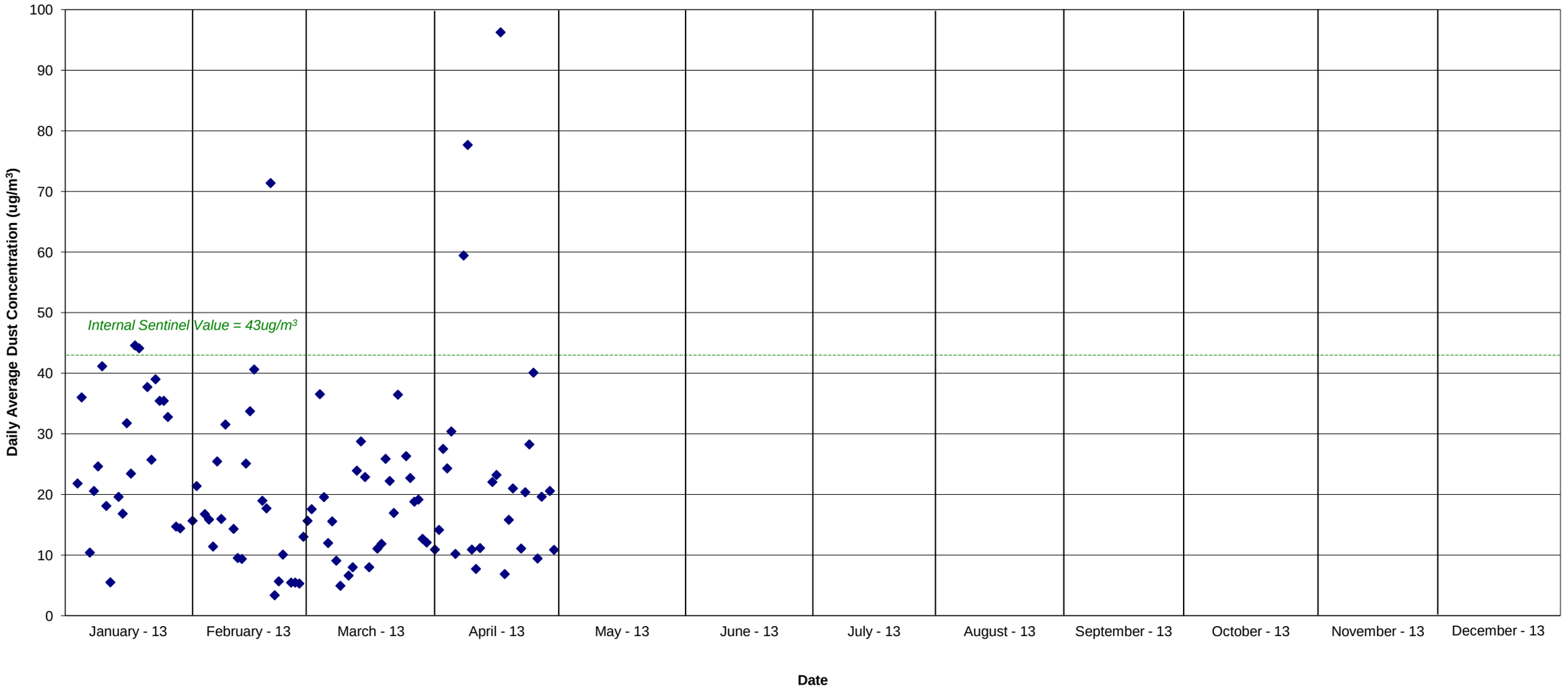
2013 Dust Monitor Summary
North Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas



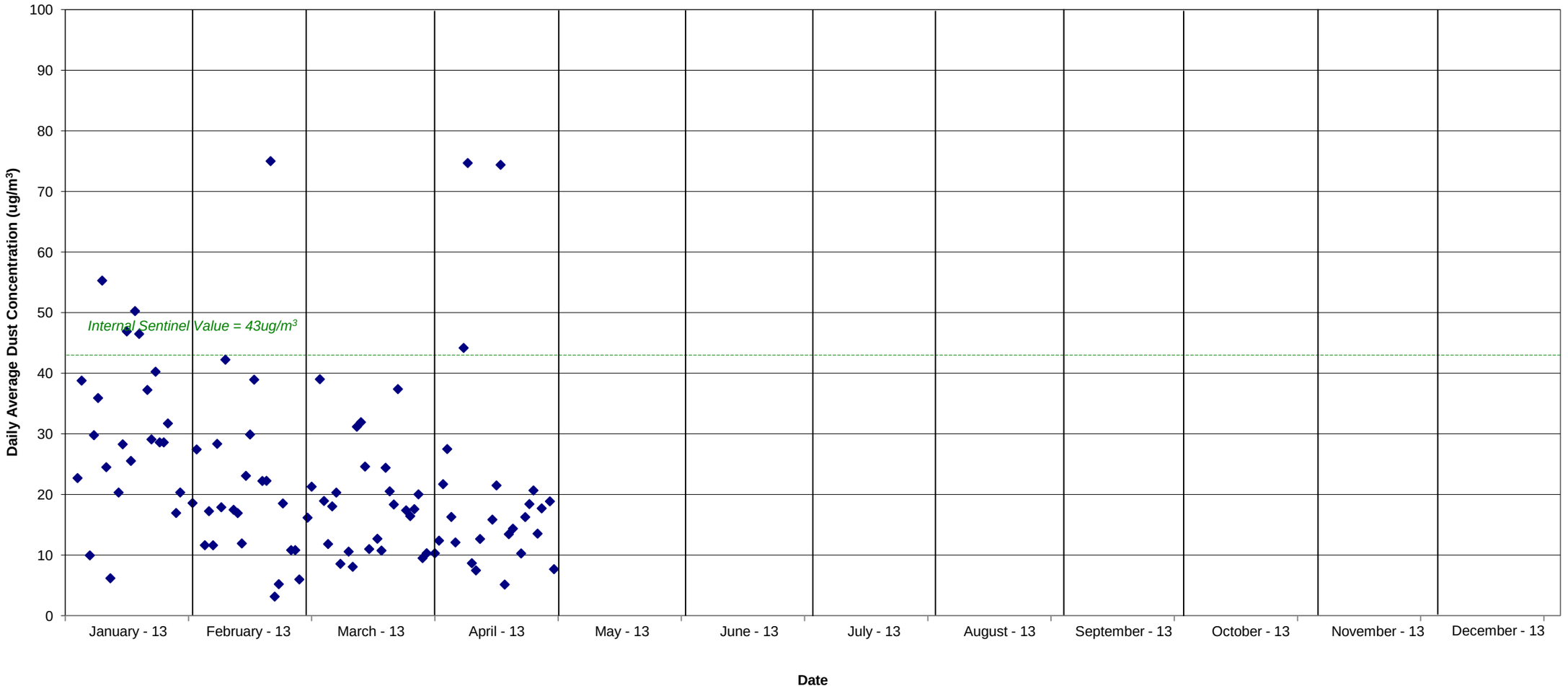
2013 Dust Monitor Summary
North East Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas



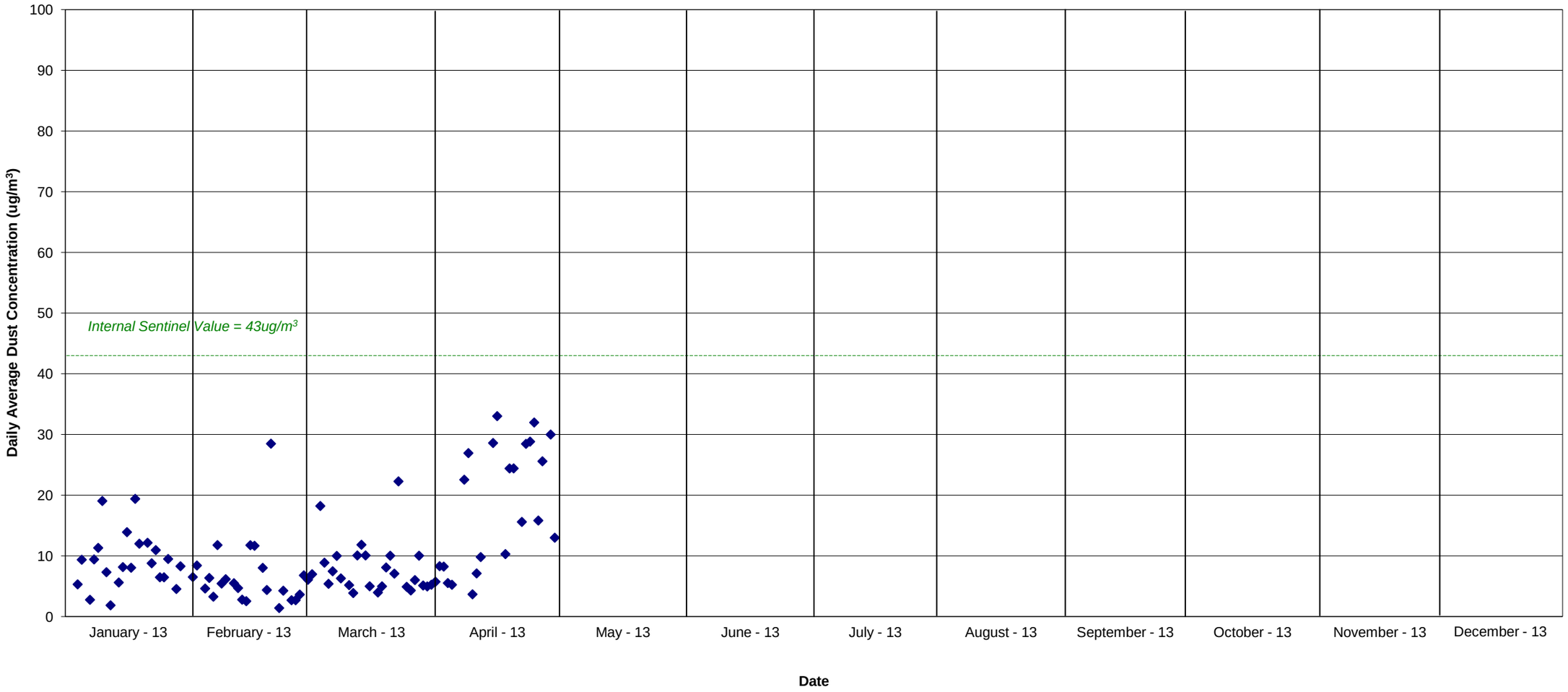
2013 Dust Monitor Summary
North West Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas



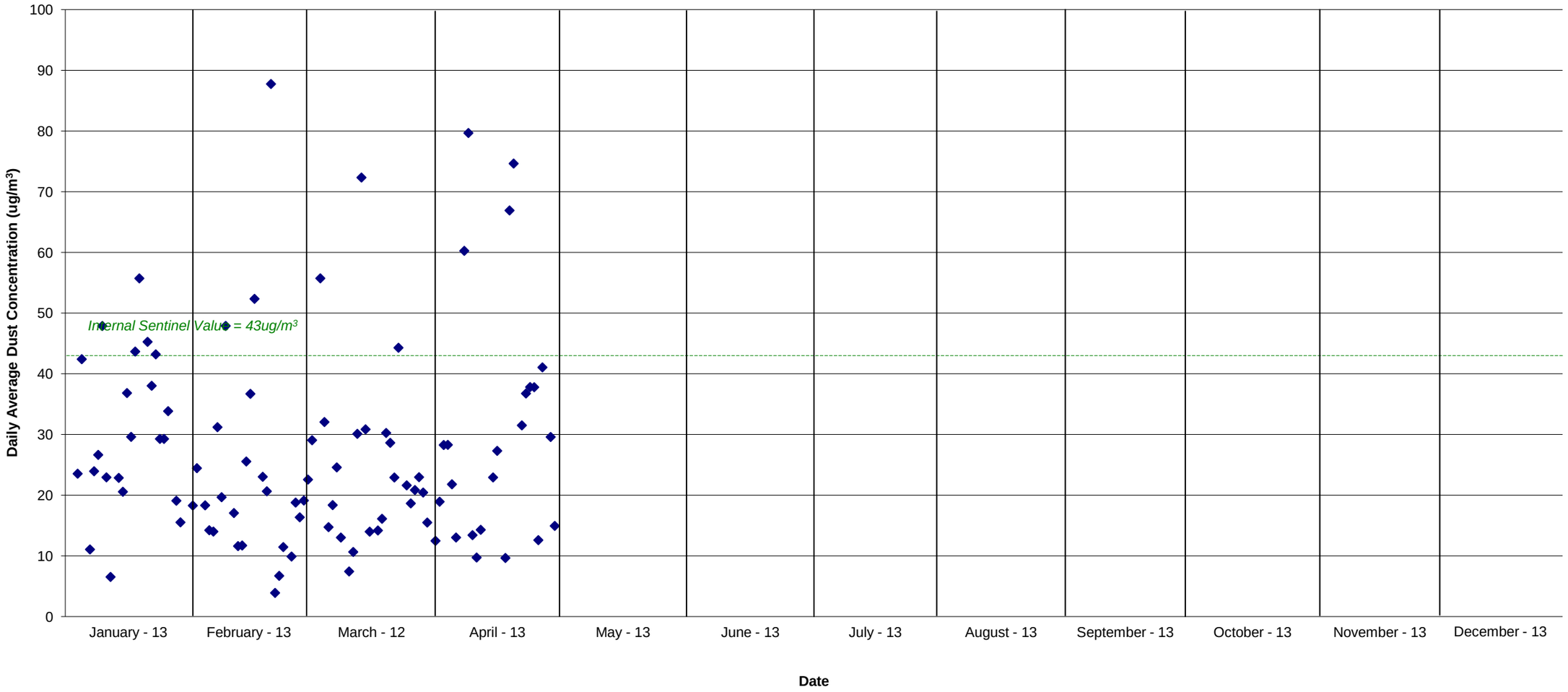
2013 Dust Monitor Summary
South Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas



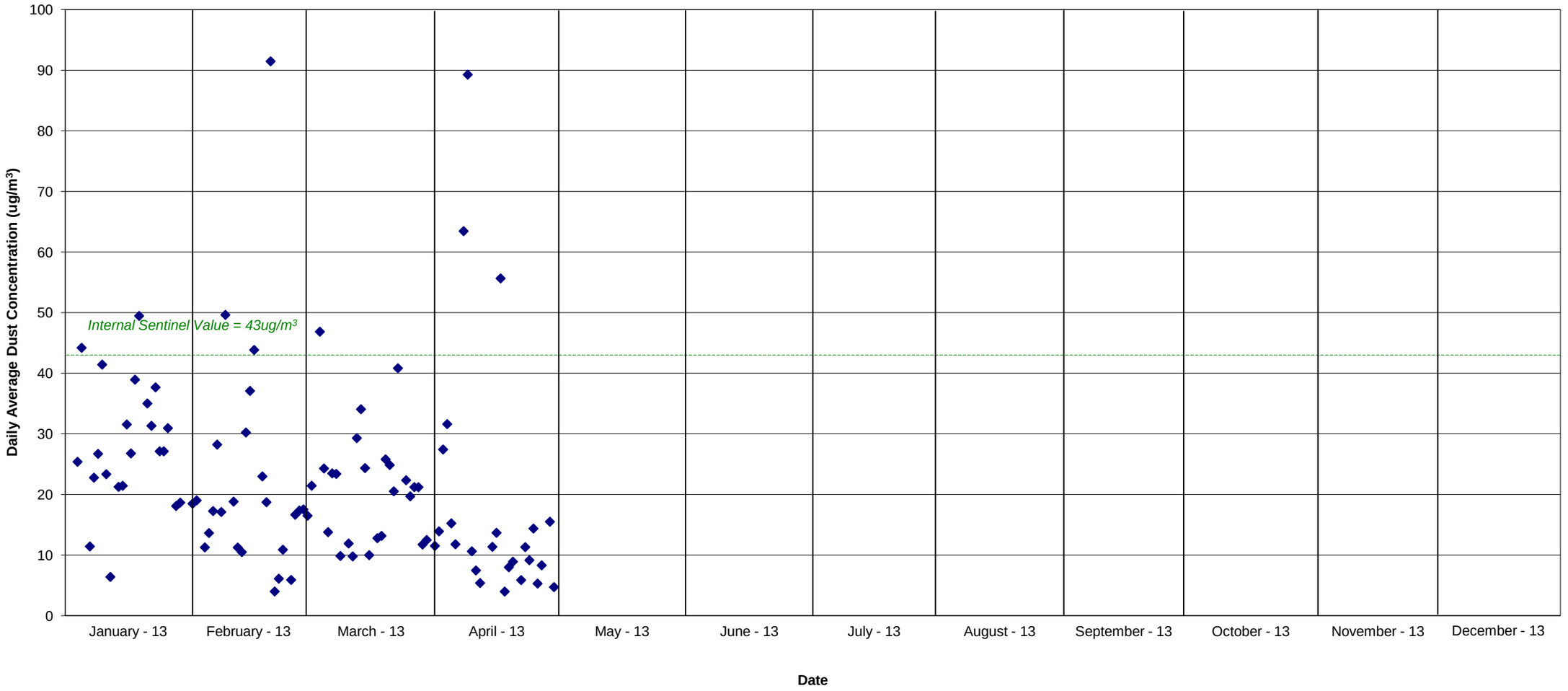
2013 Dust Monitor Summary
West Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas



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



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



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