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November 15, 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: October 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 October 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, near La Calavera, and on the east property during the month of October.

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-5 monitor which is positioned as the Northeast monitor (Attachment A, Figure 1) began transmitting a flow error ton October 2nd and was sent to the manufacturer for repair and was returned to its location on October 17th. While MP-5 was being repaired, the MP-6 (North location) monitor was positioned in the Northeast. Accordingly, as presented in Attachment C, Table 2, readings for MP-6 (North) and MP-5 (Northeast) are represented by 'ND' for 'not deployed' for the dates the monitors were not functioning properly.

In addition to the perimeter routine dust monitoring the east property air monitoring was conducted to monitor remediation activities on the Former ASARCO Smelter site property east of I-10 for the month of October. Two air monitors were positioned downwind and one air monitor was positioned upwind of the work perimeter with the average monthly prevailing wind from the north (Attachment A, Figure 1). When remediation activities change or move within the property lines the monitors are adjusted accordingly to ensure that one monitor is upwind and the other two monitors are downwind of the activity. Subsequently, EBS-N was moved to the north of the operations when excavation began on the east portion of the property east of I-10 in late September. It was moved again the first week of October to the north of property east of I-10 (current position in Figure 1) during excavation of Area 4 (north area containing Category I material on the east property).

DUST MONITORING DATA RESULTS & SUMMARY

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

Daily average dust concentrations were below the site-specific sentinel value of 43 $\mu g/m^3$ at all dust monitoring locations during the month of October with the following exceptions.

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

Dust suppression was implemented during working hours to manage onsite dust generation. Gusty winds and widespread dust were present between 11:00AM and 10:00PM in the El Paso region. High winds prevailed from the southwest with gusts up to 44 miles per hour (mph) and maximum sustained wind speeds of 36 mph. A background dust evaluation was conducted on the elevated data using the upwind (West and South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South, Arroyo West, East and Northeast (downwind) locations resulted in the actual average dust generated on site to be 38 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.

October 19th – The daily average dust concentration for the East monitor was greater than the sentinel value.

Dust suppression was implemented during working hours to manage onsite dust generation. Winds and widespread dust were present between 6:30PM and 11:00PM in the area surrounding the site. High winds prevailed from the east. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo North, Arroyo South and Northeast and East) locations. Subtracting the daily average background dust concentration at the upwind locations from the

daily average dust concentration for the Arroyo West, Northwest and West (downwind) locations resulted in the actual average dust generated on site to be 12 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to offsite 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

EBS E
EBS N
EBS S
South
East
North East
Arroyo South
La Calavera
Arroyo North
North
West
Arroyo West
North West
10
85

Legend

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

N

0 250 500 1,000 Feet

SCALE 1"=500'

MALCOLM PIRNIE

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

Texas Custodial Trust
El Paso Smelter Site
Air Monitoring Plan

AIR MONITORING NETWORK

NOVEMBER 2013 | 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

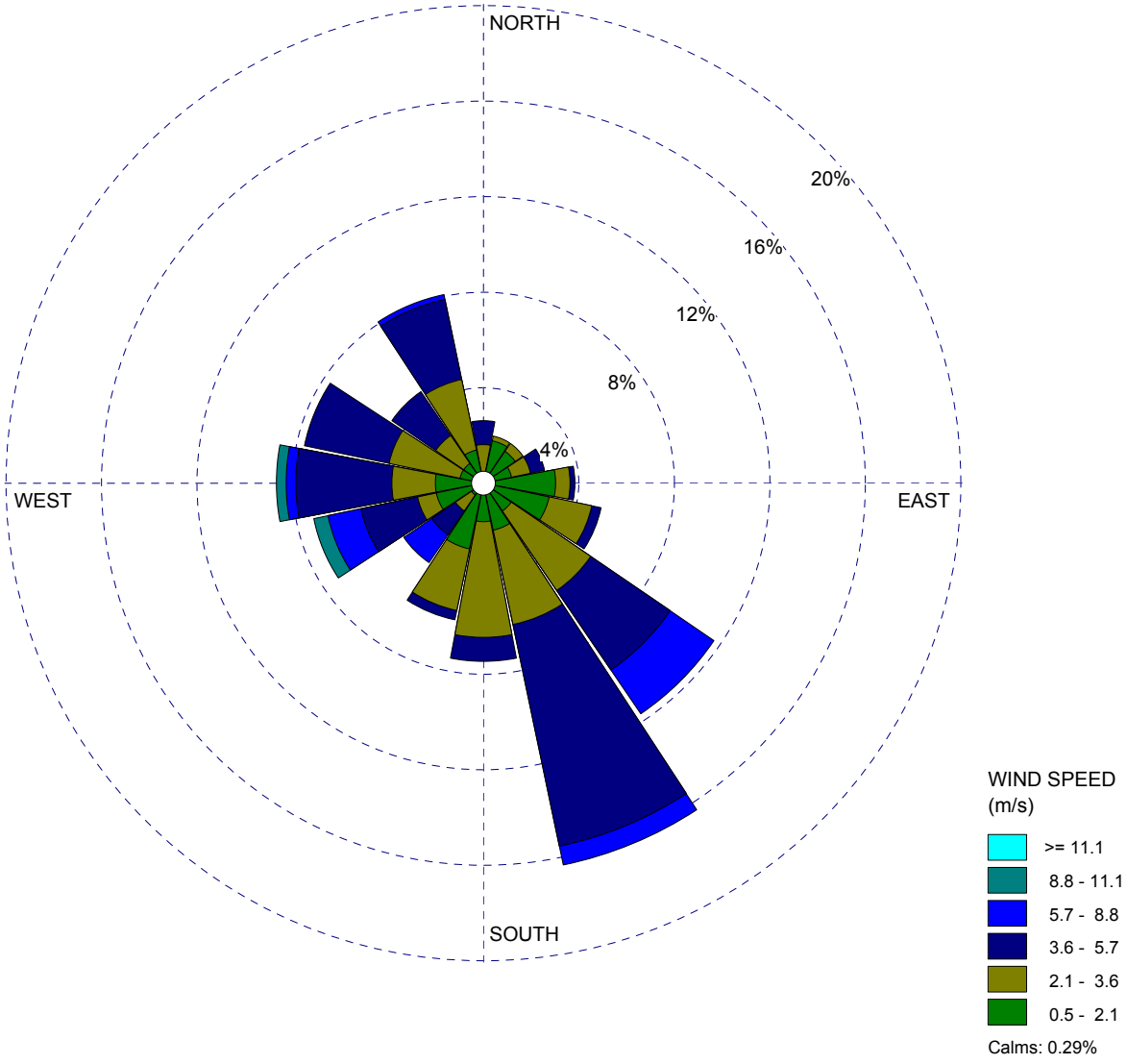
Wind Rose Plots

WIND ROSE PLOT:

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

DISPLAY:

Wind Speed
Direction (blowing from)



COMMENTS: NOTE: Wind data was obtained from onsite meteorological station.	DATA PERIOD: **Start Date: 10/1/2013 - 00:00** **End Date: 10/31/2013 - 23:00**	COMPANY NAME: **Malcolm Pirnie, Inc**	
		MODELER: **Karina E Correa**	
	CALM WINDS: **0.29%**	TOTAL COUNT: **497 hrs.**	
	AVG. WIND SPEED: **3.30 m/s**	DATE: **11/10/2013**	PROJECT NO.: **06835001.2012**

Attachment C

Tables

TABLE 1

October Elevated Dust Monitor Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

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

Date	Location	Maximum Value (µg/m^3)	Comments	Action
10/10/2013	West and East	98	Dust suppression was implemented during working hours to manage onsite dust generation. Gusty winds and widespread dust were present between 11:00AM and 10:00PM in the El Paso region. High winds prevailed from the southwest with gusts up to 44 miles per hour (mph) and maximum sustained wind speeds of 36 mph. A background dust evaluation was conducted on the elevated data using the upwind (West and South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo North, Arroyo South, Arroyo West, East and Northeast (downwind) locations resulted in the actual average dust generated on site to be 38 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. The elevated dust concentrations for the day are attributed to meteorological conditions.	Dust suppression was implemented during working hours to manage onsite dust generation.
10/19/2013	East	49	Dust suppression was implemented during working hours to manage onsite dust generation. Winds and widespread dust were present between 6:30PM and 11:00PM in the area surrounding the site. High winds prevailed from the east. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo North, Arroyo South and Northeast and East) locations. Subtracting the daily average background dust concentration at the upwind locations from the daily average dust concentration for the Arroyo West, Northwest and 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. The elevated dust concentrations for the day are attributed to offsite conditions.	Dust suppression was implemented during working hours to manage onsite dust generation.

TABLE 2

October Daily Average Dust Monitoring Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Week ending October 5th						
Date	Monday, September 30, 2013	Tuesday, October 01, 2013	Wednesday, October 02, 2013	Thursday, October 03, 2013	Friday, October 04, 2013	Saturday, October 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 ($\mu g/m^3$)
Arroyo West		11	12	14	9	9
Arroyo South		3	4	7	4	3
Arroyo North		5	7	7	5	4
La Calavera		6	8	9	7	7
Northeast		5	ND	11	12	9
North		7	9	11	ND	ND
Northwest		6	10	9	7	7
East		13	20	24	22	17
South		7	9	10	10	7
West		10	13	14	11	17
EBS N		7	8	8	11	15
EBS S		10	10	10	9	10
EBS E		12	12	8	8	8
Week ending October 12th						
Date	Monday, October 07, 2013	Tuesday, October 08, 2013	Wednesday, October 09, 2013	Thursday, October 10, 2013	Friday, October 11, 2013	Saturday, October 12, 2013
Location	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)
Arroyo West	29	28	21	25	13	18
Arroyo South	8	12	8	15	5	7
Arroyo North	15	17	13	15	7	11
La Calavera	20	20	15	18	10	16
Northeast	25	25	21	30	14	17
North	ND	ND	ND	ND	ND	17
Northwest	20	19	15	22	9	14
East	33	36	30	98	23	27
South	17	19	14	18	9	14
West	35	29	25	46	16	21
EBS N	20	19	10	16	13	16
EBS S	16	19	17	25	13	18
EBS E	18	16	16	22	13	16
Week ending October 19th						
Date	Monday, October 14, 2013	Tuesday, October 15, 2013	Wednesday, October 16, 2013	Thursday, October 17, 2013	Friday, October 18, 2013	Saturday, October 19, 2013
Location	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)
Arroyo West	11	12	18	24	18	35
Arroyo South	6	4	9	9	6	11
Arroyo North	7	6	10	14	10	19
La Calavera	11	8	12	19	15	25
Northeast	9	8	14	21	17	30
North	ND	ND	ND	7	10	26
Northwest	8	8	11	16	13	25
East	21	16	24	35	25	49
South	8	7	9	15	10	27
West	11	13	16	28	20	36
EBS N	11	9	23	23	12	22
EBS S	12	9	13	19	15	24
EBS E	10	8	12	17	14	23
Week ending October 26th						
Date	Monday, October 21, 2013	Tuesday, October 22, 2013	Wednesday, October 23, 2013	Thursday, October 24, 2013	Friday, October 25, 2013	Saturday, October 26, 2013
Location	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)
Arroyo West	14	26	39	22	16	12
Arroyo South	4	8	8	8	4	4
Arroyo North	7	15	13	13	8	7
La Calavera	10	19	18	18	11	10
Northeast	11	20	19	19	10	11
North	11	17	19	17	10	8
Northwest	10	18	18	16	10	9
East	22	35	33	31	17	18
South	8	16	16	14	8	8
West	12	26	26	22	16	12
EBS N	8	27	10	13	11	11
EBS S	10	20	19	22	12	12
EBS E	10	9	13	15	11	11
Week ending November 2nd						
Date	Monday, October 28, 2013	Tuesday, October 29, 2013	Wednesday, October 30, 2013	Thursday, October 31, 2013	Friday, November 01, 2013	Saturday, November 02, 2013
Location	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)	Average Reading ($\mu g/m^3$)
Arroyo West	19	20	17	7		
Arroyo South	7	9	8	3		
Arroyo North	12	10	9	4		
La Calavera	13	12	14	6		
Northeast	15	17	16	14		
North	13	12	12	7		
Northwest	12	11	12	5		
East	23	24	28	9		
South	12	13	11	4		
West	20	21	22	6		
EBS N	12	14	13	7		
EBS S	12	18	14	9		
EBS E	9	13	12	7		

NOTES:

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

Dust Monitor Summary
South Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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 $\mu g/m^3$ for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/16/2013	South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-one percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 12 $\mu g/m^3$ for this monitor was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/18/2013	South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty-seven percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 19 $\mu g/m^3$ for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/19/2013	South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-nine percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 18 $\mu g/m^3$ for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
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.
6/6/2013	South	Dust suppression was implemented during working hours to manage onsite dust generation. Gusty winds and widespread dust were present after 8:00 PM in the El Paso region. High winds prevailed from the east with gusts up to 40 miles per hour (mph) and maximum sustained wind speeds of 35 mph. A background dust evaluation was conducted on the elevated data using the upwind (East, North East, Arroyo South and Arroyo North) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the West, Arroyo West and North West (downwind) locations resulted in the actual average dust generated on site to be 16 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. The elevated dust concentrations for the day are attributed to meteorological conditions.
6/24/2013	South	Dust suppression was implemented during working hours to manage onsite dust generation. Rain showers and thunderstorms were present in the evening with winds prevailing from the west southwest at an average speed of 9 mph and wind gusts up to 33 mph. A background dust evaluation was conducted on the elevated data using the upwind (South and North West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North East and La Calavera (downwind) locations resulted in the actual average dust generated on site to be 10 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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
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.
5/2/2013	West	Dust suppression was implemented to manage onsite dust generation. The National Weather Service issued a wind advisory for the El Paso region. Gusty winds were present with colder temperatures. Winds in the El Paso region were from the east northeast with sustained winds of up to 27 mph with wind gusts up to 45 mph. A background dust evaluation was conducted on the elevated data using the upwind (Calavera) location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the West (downwind) location resulted in the actual average dust generated on site to be 3 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. The elevated dust concentrations for the day are attributed to meteorological conditions.
5/10/2013	West	Dust suppression was implemented to manage onsite dust generation. A low pressure system moved across the El Paso region generating winds in the afternoon. This weather system produced north northeast sustained wind speeds of 10 mph with gusts around 40 mph. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo North, Arroyo South, La Calavera and North East) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North West, West, South, and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 28 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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
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 ug/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 ug/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.
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.

Dust Monitor Summary
North West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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
11/1/2012	North	Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20˚F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions.
11/2/2012	North	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.
11/8/2012	North	The North monitor had an error flow reading before the start of the work day and stopped recording before worked commenced. The exceedance is attributed to the early morning inversion layer and limited data recorded for this day.
12/12/2012	North	An inversion layer settled into the El Paso region in the evening on December 11th, dissipated by noon on December 12th, and then settled back in the area by early evening. Widespread and offsite particulate matter was trapped by this inversion, which resulted in instantaneous dust exceedances with the highest readings occurring from 4:00PM to 11:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/18/2012	North	A cold front entered the El Paso area creating an inversion layer in the evening after working hours. Instantaneous dust concentration exceedances began after 5:00PM and continued throughout the evening. While only the above listed monitors show daily average dust concentrations greater than the sentinel value all monitors had instantaneous exceedances throughout the evening. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/19/2012	North	Wind gusts up to 62 mph were present in the El Paso area with an average wind speed of 21 mph prevailing from the west. Due to the high winds widespread dust was present in the area from 8:00AM to 4:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/19/2013	North	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-nine percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 18 µg/m^3 for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
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
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 µg/m^3 which is at the site-specific sentinel value of 43 µg/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 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	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 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
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
North East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
5/24/2013	North East	Dust suppression was implemented to manage onsite dust generation. South southeast winds averaged 5 mph with gusts up to 31 mph. Widespread dust was present in the area in the evening. A background dust evaluation was conducted on the elevated data using the upwind (East) location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, North West and West (downwind) locations resulted in the actual average dust generated on site to be 6 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. The elevated dust concentrations for the day are attributed to meteorological conditions.
6/27/2013	North East	Dust suppression was implemented during working hours to manage onsite dust generation. As an added measure and standard practice, field staff are reminded to implement increased water application for dust suppression during high wind days and days of widespread dust. Southeast winds averaged 5 mph with gusts up to 25 mph. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo South, East and South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, Arroyo North and 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. 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
11/1/2012	East	Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20˚F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions.
11/2/2012	East	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.
11/7/2012	East	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.
11/10/2012	East	Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. A background dust evaluation was conducted on the elevated data using the upwind (West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the two downwind locations resulted in the actual dust generated on site to be 43 µg/m^3 which is at the site-specific sentinel value of 43 µg/m^3.
11/14/2012	East	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.
11/28/2012	East	The prevailing wind was from the northeast that day. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo North) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North West (downwind) location resulted in the actual dust generated on site to be 11 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. No increase in dust suppression activities was conducted. The elevated dust concentrations for the day are attributed to off-site conditions.
11/30/2012	East	The prevailing wind was from the south that day. A background dust evaluation was conducted on the elevated data using the upwind (South) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East (downwind) location resulted in the actual dust generated on site to be 22 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. No increase in dust suppression activities was conducted. The elevated dust concentrations for the day are attributed to off-site conditions.

Dust Monitor Summary
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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 $\mu g/m^3$ 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	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 $\mu g/m^3$ 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	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.
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 $\mu g/m^3$ 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.
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 $\mu g/m^3$ 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
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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.
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.

Dust Monitor Summary
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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.
5/2/2013	East	Dust suppression was implemented to manage onsite dust generation. The National Weather Service issued a wind advisory for the El Paso region. Gusty winds were present with colder temperatures. Winds in the El Paso region were from the east northeast with sustained winds of up to 27 mph with wind gusts up to 45 mph. A background dust evaluation was conducted on the elevated data using the upwind (Calavera) location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the West (downwind) location resulted in the actual average dust generated on site to be 3 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. The elevated dust concentrations for the day are attributed to meteorological conditions.
8/14/2013	East	Dust suppression was implemented during working hours to manage onsite dust generation. Gusty winds and widespread dust were present after 8:00 PM in the El Paso region. High winds prevailed from the northeast with gusts up to 43 miles per hour (mph) and maximum sustained wind speeds of 35 mph. A background dust evaluation was conducted on the elevated data using the upwind (EBS S, EBS N, EBS E) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East, South, and West (downwind) locations resulted in the actual average dust generated on site to be 17 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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
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.
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
Calavera Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
5/2/2013	Calavera	Dust suppression was implemented to manage onsite dust generation. The National Weather Service issued a wind advisory for the El Paso region. Gusty winds were present with colder temperatures. Winds in the El Paso region were from the east northeast with sustained winds of up to 27 mph with wind gusts up to 45 mph. A background dust evaluation was conducted on the elevated data using the upwind (Calavera) location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the West (downwind) location resulted in the actual average dust generated on site to be 3 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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
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.
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.

Dust Monitor Summary
Arroyo West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
12/20/2012	Arroyo West	An early morning inversion layer settled in the El Paso area before and after working hours which trapped offsite and widespread particulate matter. The inversion layer dispersed by 11:00AM and settled in again after 6:00PM. The highest instantaneous dust concentration exceedances occurred between 7:00PM and 10:30PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/10/2013	Arroyo West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-six percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 15 µg/m^3 for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/18/2013	Arroyo West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty-seven percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 19 µg/m^3 for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/19/2013	Arroyo West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-nine percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 18 µg/m^3 for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/21/2013	Arroyo West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-seven percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 23 µg/m^3 for this monitor was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/23/2013	Arroyo West	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty-eight percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 21 µg/m^3 for this monitor was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
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.

Dust Monitor Summary
Arroyo West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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.
5/2/2013	Arroyo West	Dust suppression was implemented to manage onsite dust generation. The National Weather Service issued a wind advisory for the El Paso region. Gusty winds were present with colder temperatures. Winds in the El Paso region were from the east northeast with sustained winds of up to 27 mph with wind gusts up to 45 mph. A background dust evaluation was conducted on the elevated data using the upwind (Calavera) location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the West (downwind) location resulted in the actual average dust generated on site to be 3 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. 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
5/23/2013	Arroyo West	Dust suppression was implemented to manage onsite dust generation. Widespread dust was present in the evening with south southeast winds sustained winds at 30 mph and wind gusts reaching 40 mph. A background dust evaluation was conducted on the elevated data using the upwind (East) location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West and 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. The elevated dust concentrations for the day are attributed to meteorological conditions.
6/29/2013	Arroyo West	Dust suppression was implemented during working hours to manage onsite dust generation. Winds prevailed from the south southeast averaging 7 mph with gusts up to 33 mph. A background dust evaluation was conducted on the elevated data using the upwind (South) location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East (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. 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
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.

Dust Monitor Summary
Arroyo South Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
1/5/2013	Arroyo South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty-three percent of the instantaneous exceedances occurred in the evening or early morning, outside working hours. A light freezing fog was present from 9AM to 11AM which contributes to higher readings in the air monitors due to the presence of water vapor. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 32 µg/m^3 for this monitor was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/19/2013	Arroyo South	Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Ninety-nine percent of instantaneous exceedances occurred in the evening or early morning, outside working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration of 18 µg/m^3 for these monitors was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.
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.

Dust Monitor Summary
Arroyo South Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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 $\mu g/m^3$ 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.
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 $\mu g/m^3$ 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.
6/6/2013	Arroyo South	Dust suppression was implemented during working hours to manage onsite dust generation. Gusty winds and widespread dust were present after 8:00 PM in the El Paso region. High winds prevailed from the east with gusts up to 40 miles per hour (mph) and maximum sustained wind speeds of 35 mph. A background dust evaluation was conducted on the elevated data using the upwind (East, North East, Arroyo South and Arroyo North) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the West, Arroyo West and North West (downwind) locations resulted in the actual average dust generated on site to be 16 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
6/24/2013	Arroyo South	Dust suppression was implemented during working hours to manage onsite dust generation. Rain showers and thunderstorms were present in the evening with winds prevailing from the west southwest at an average speed of 9 mph and wind gusts up to 33 mph. A background dust evaluation was conducted on the elevated data using the upwind (South and North West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North East and La Calavera (downwind) locations resulted in the actual average dust generated on site to be 10 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.

Dust Monitor Summary
Arroyo North Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

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

Dust Monitor Summary
Arroyo North Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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.
6/24/2013	Arroyo North	Dust suppression was implemented during working hours to manage onsite dust generation. Rain showers and thunderstorms were present in the evening with winds prevailing from the west southwest at an average speed of 9 mph and wind gusts up to 33 mph. A background dust evaluation was conducted on the elevated data using the upwind (South and North West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North East and La Calavera (downwind) locations resulted in the actual average dust generated on site to be 10 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. The elevated dust concentrations for the day are attributed to meteorological conditions.

Dust Monitor Summary
East Borrow Source North Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
2/20/2013	EBS N	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	EBS N	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 $\mu g/m^3$ 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
East Borrow Source South Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
2/20/2013	EBS S	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	EBS S	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 $\mu g/m^3$ 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.
3/5/2013	EBS S	Wind gusts peaked at 21 mph and an average wind speed of 9 mph prevailing from the east. A background dust evaluation was conducted on the elevated data using the upwind (EBS Downwind1) monitor location and downwind (EBS Downwind2) location. The upwind monitor showed a higher daily average dust concentration than the downwind monitor. This data indicates that dust from offsite migrated onto the construction site and onsite dust suppression measures mitigated dust migration offsite. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological and offsite conditions.
3/23/2013	EBS S	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 $\mu g/m^3$ 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.

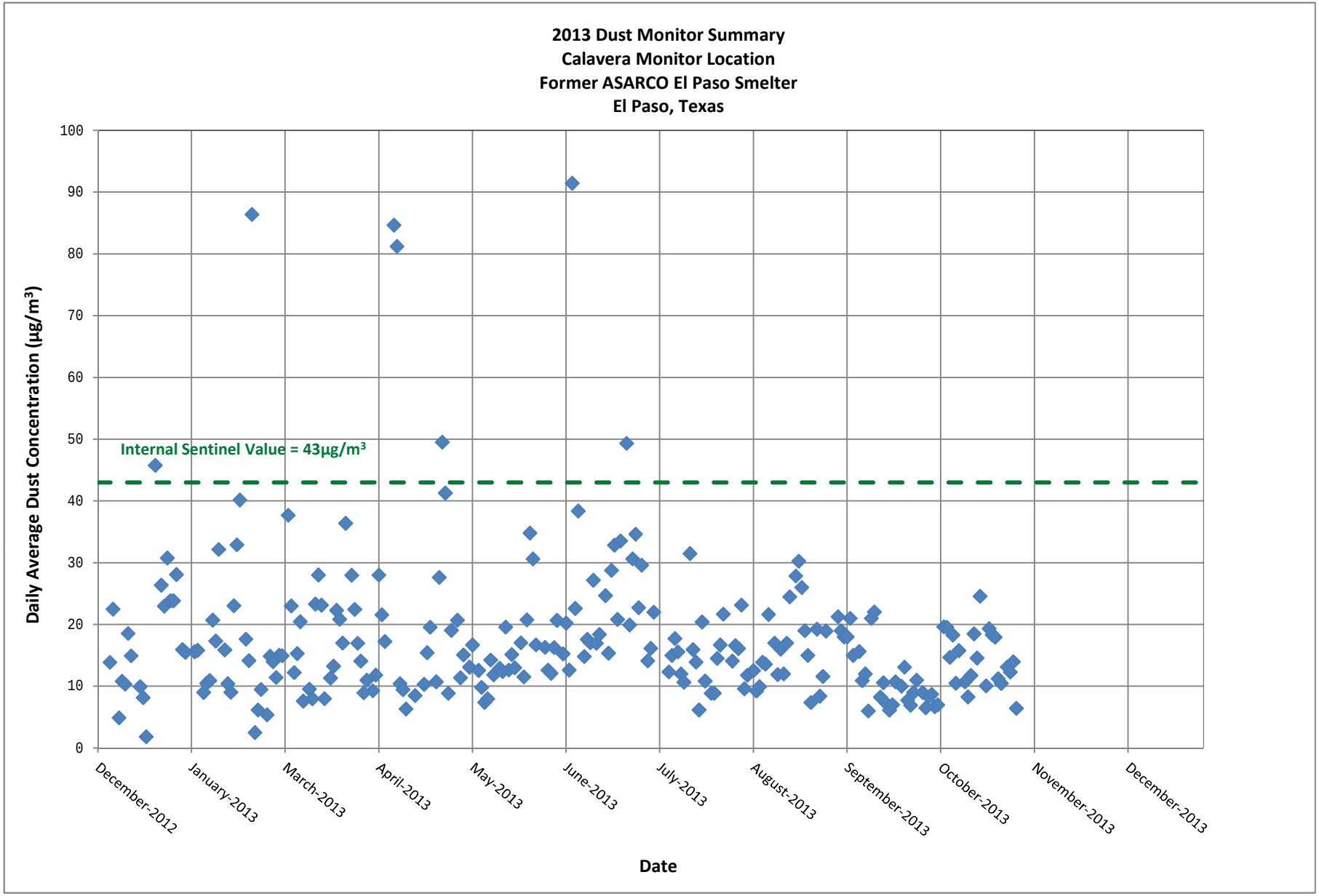
Dust Monitor Summary
East Borrow Source East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
2/20/2013	EBS E	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	EBS E	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 $\mu g/m^3$ 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.

Attachment D

Dust Concentration Graphs



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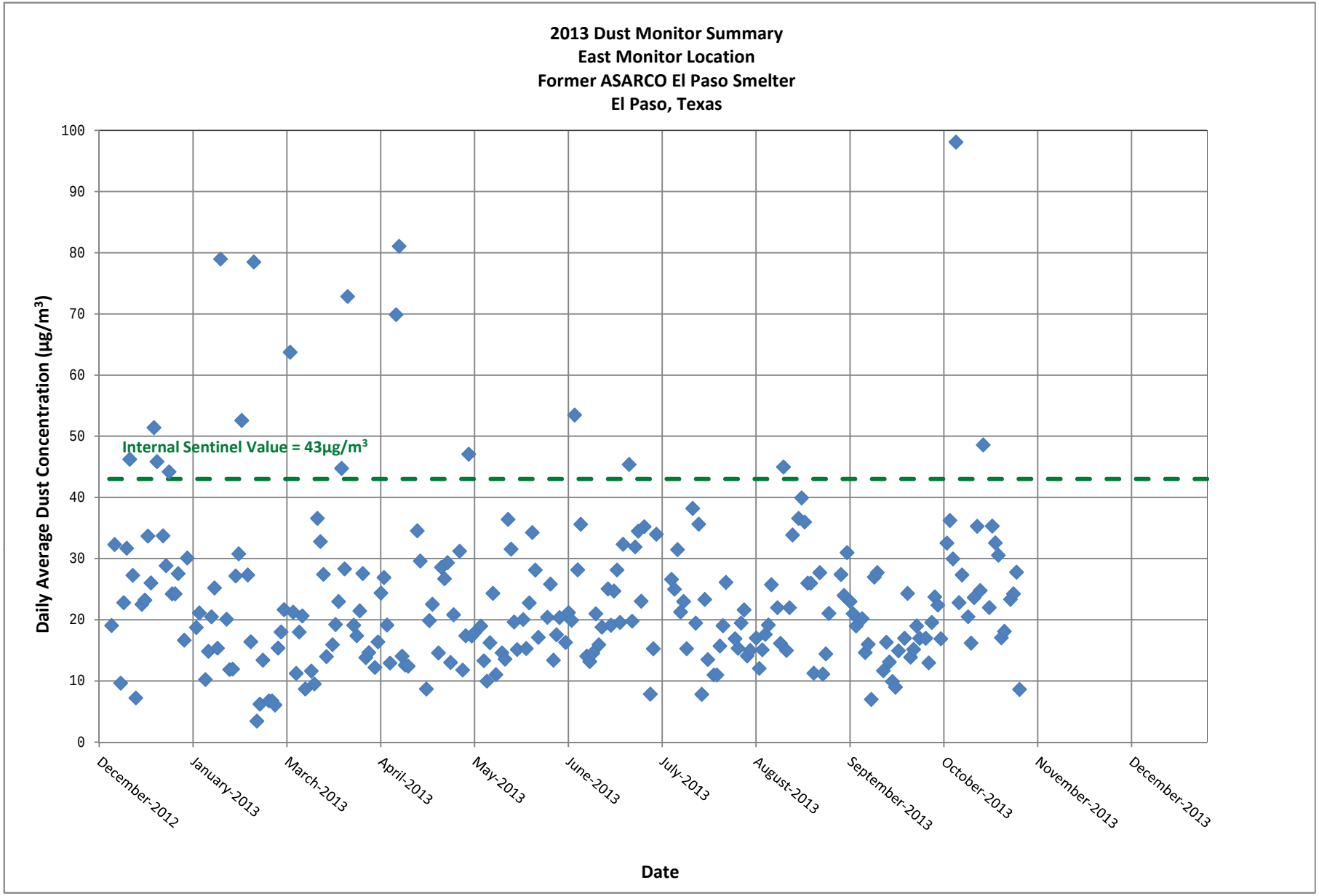

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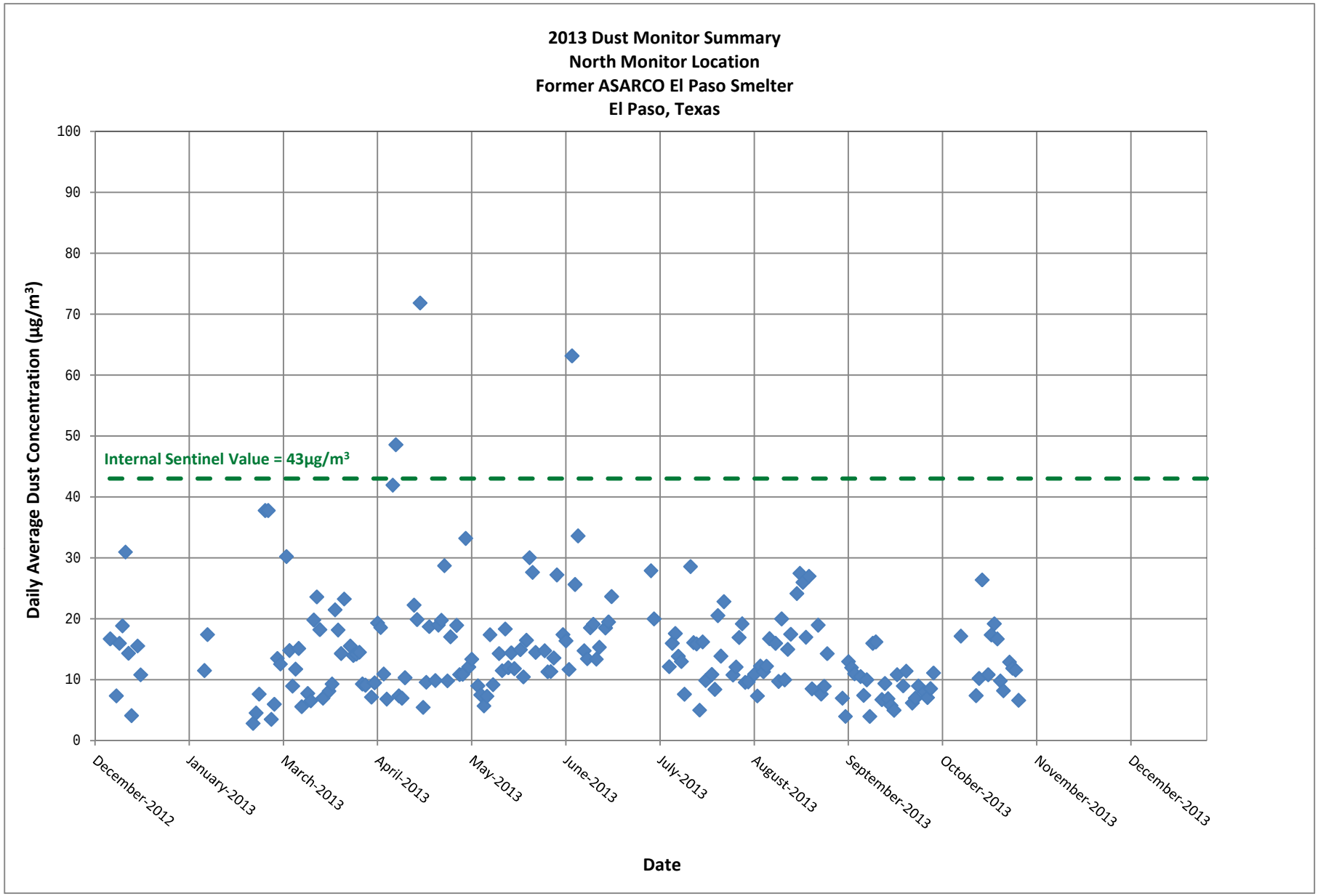

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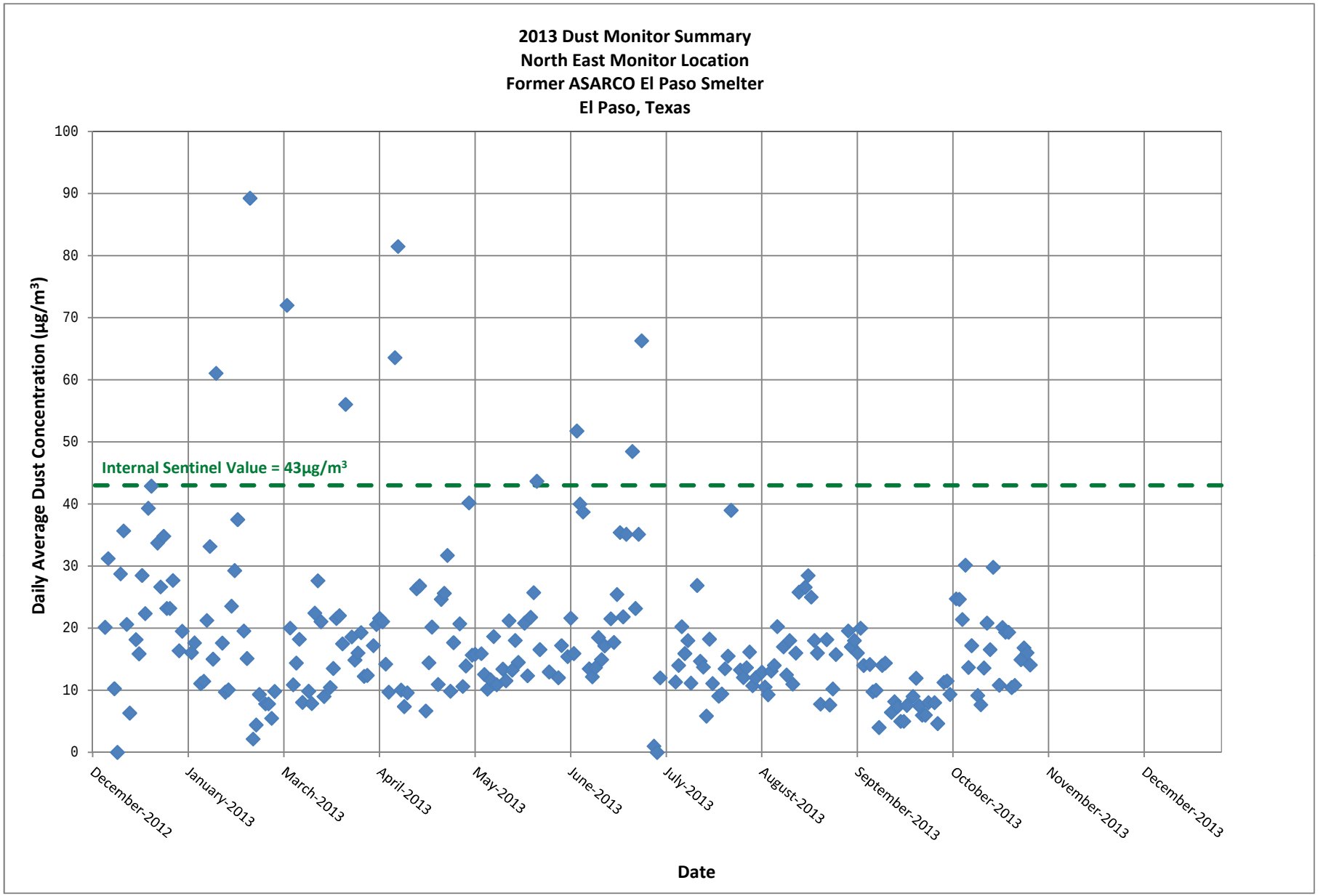
2013 Dust Monitor Summary
North East Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
Internal Sentinel Value = 43µg/m³
100
90
80
70
60
50
40
30
20
10
0
December-2012
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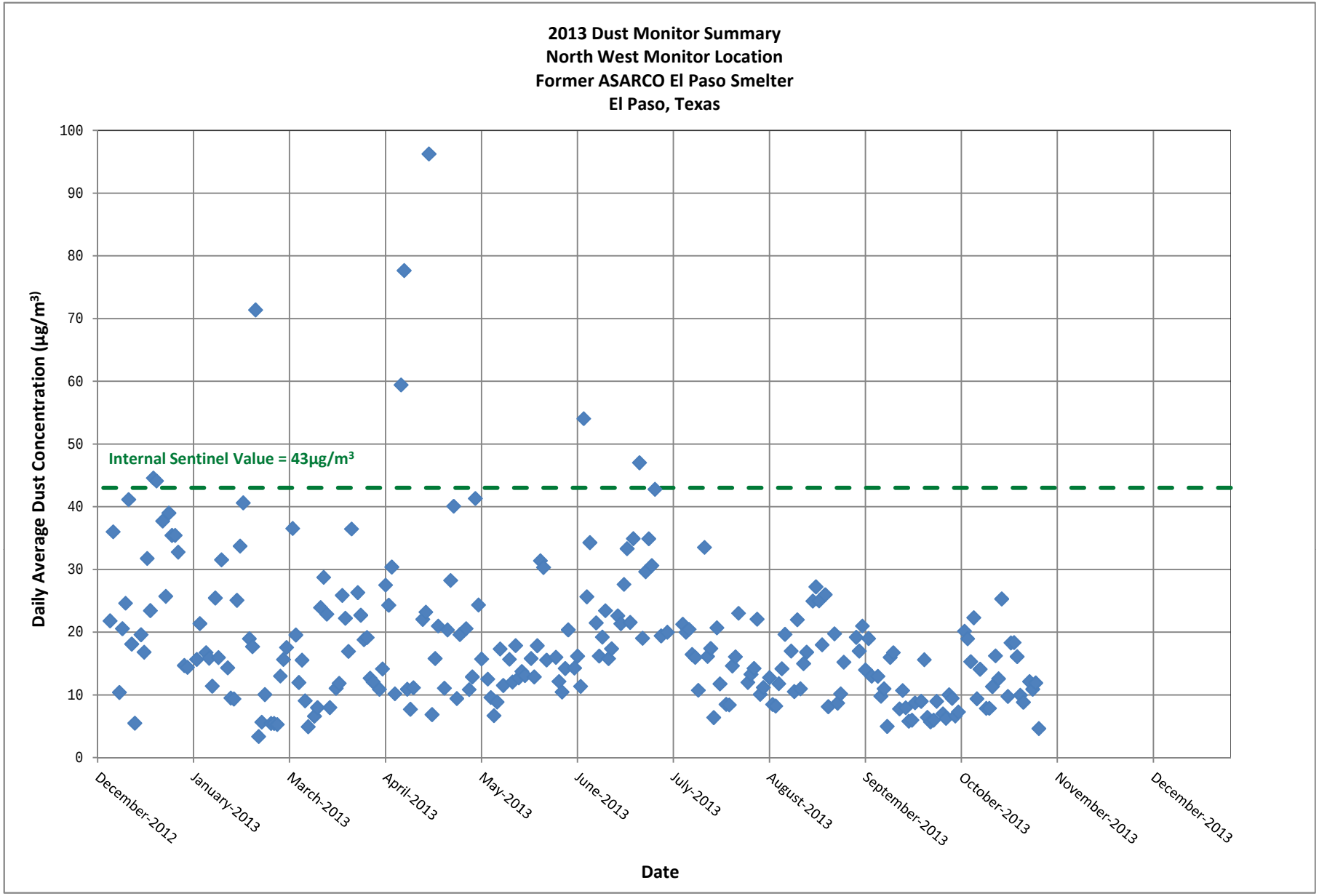
November-2013
December-2013
Date



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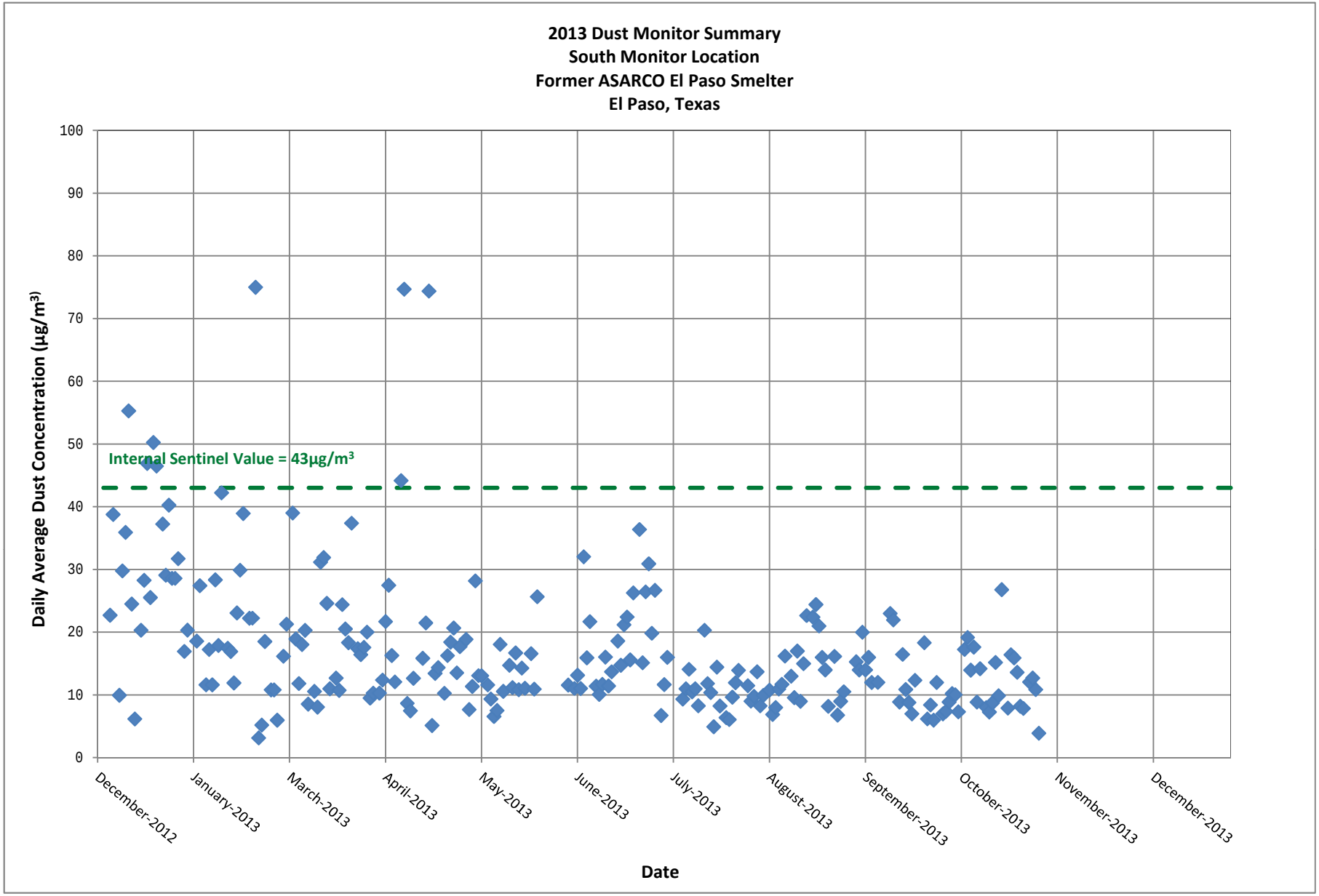

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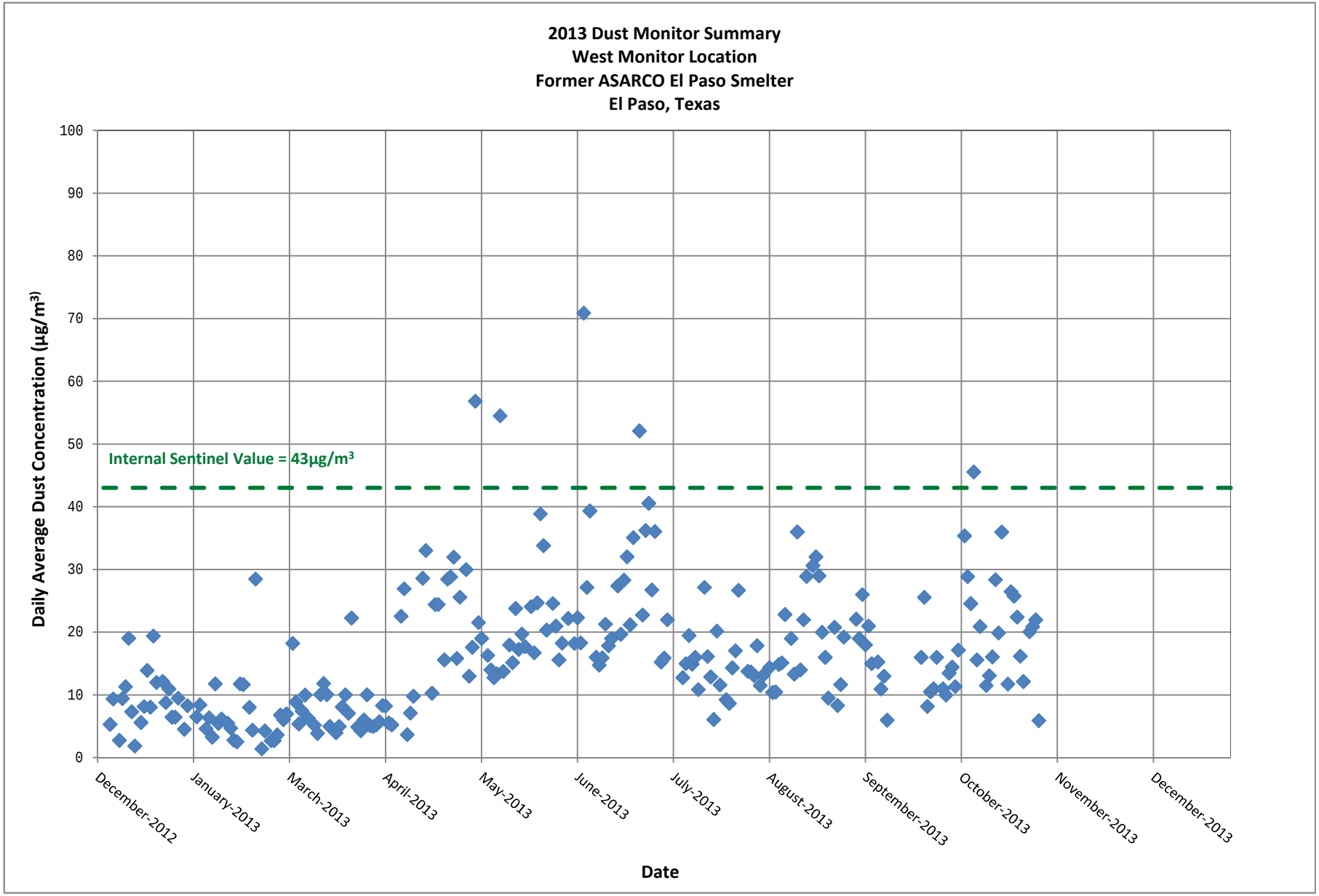

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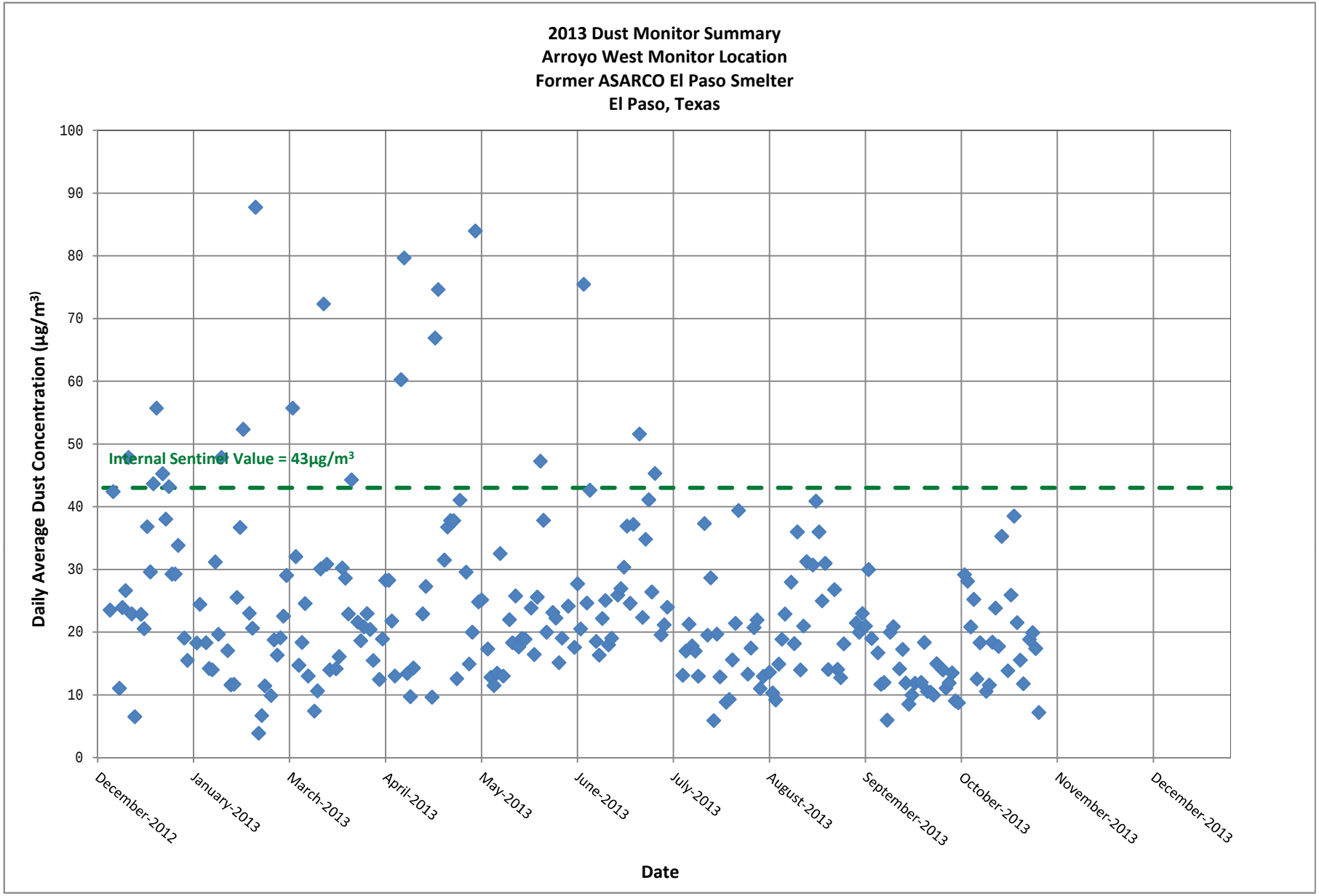

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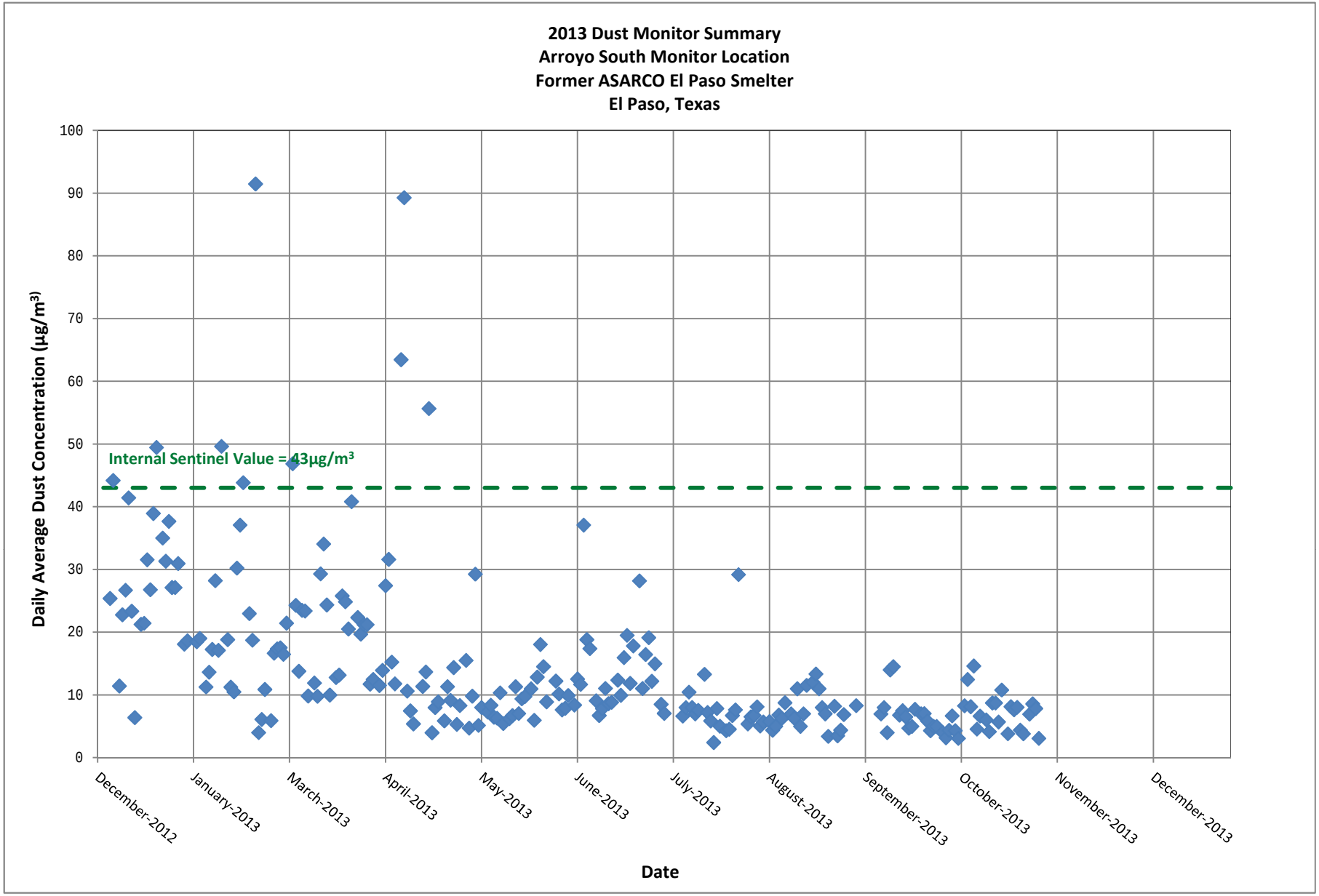

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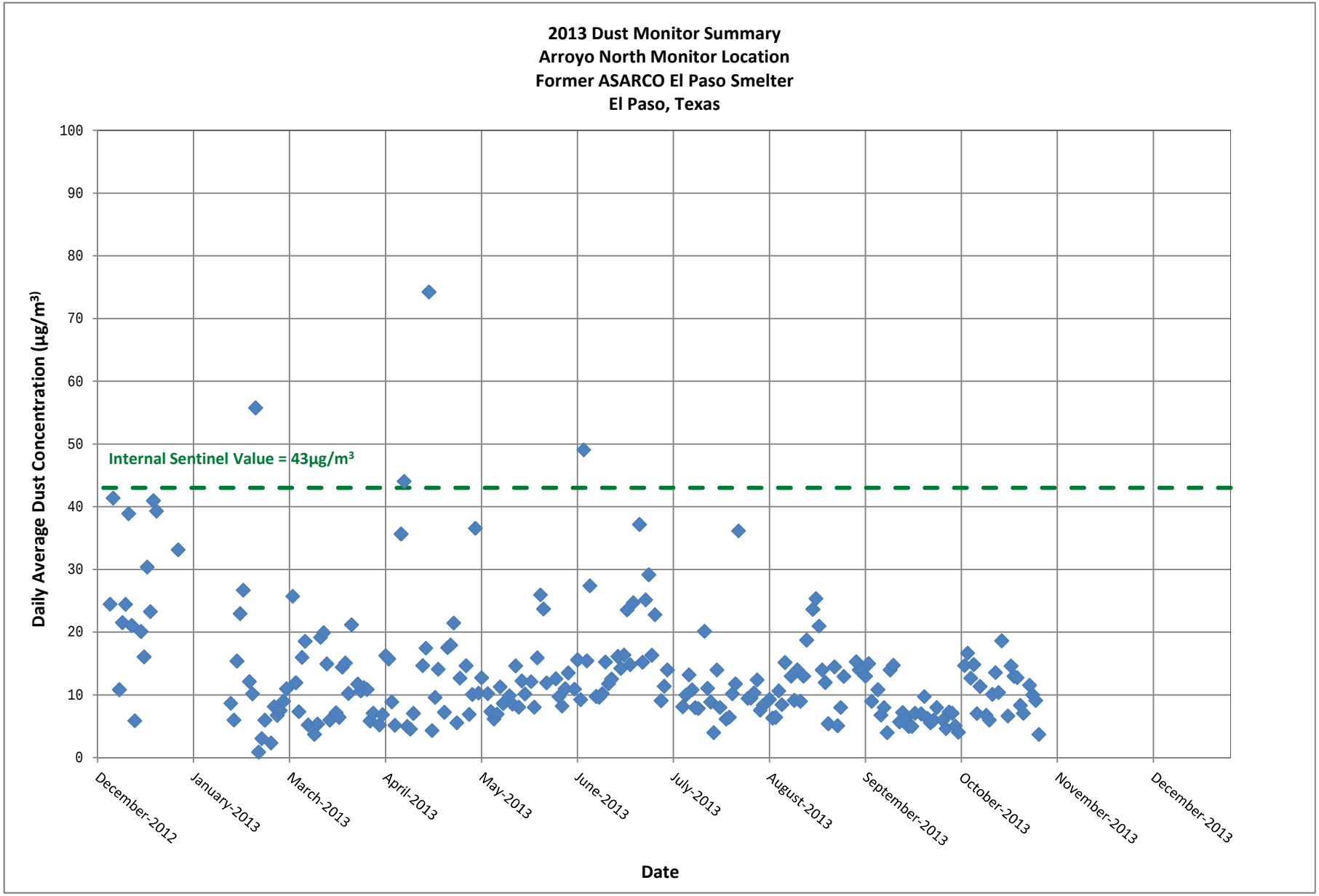

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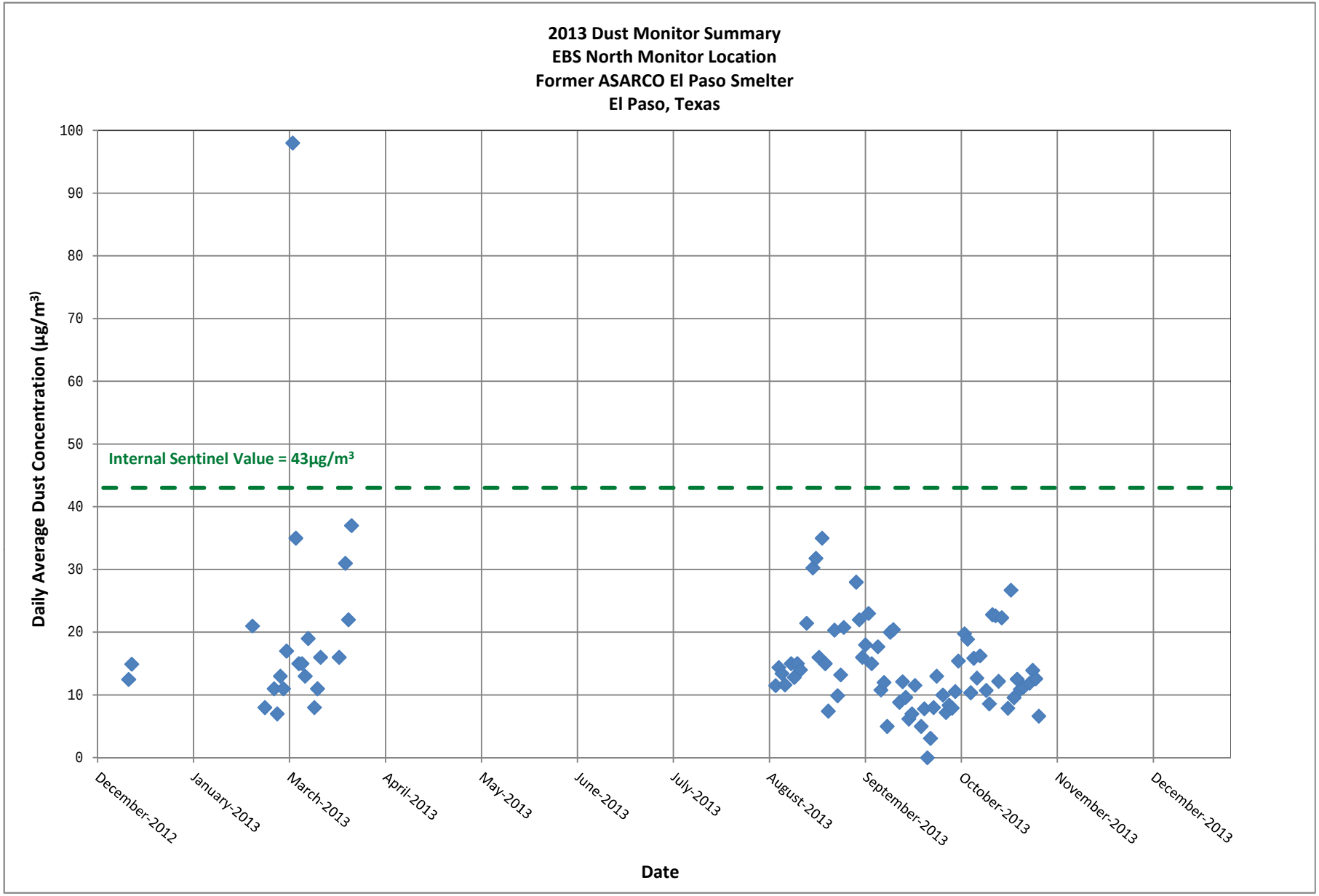

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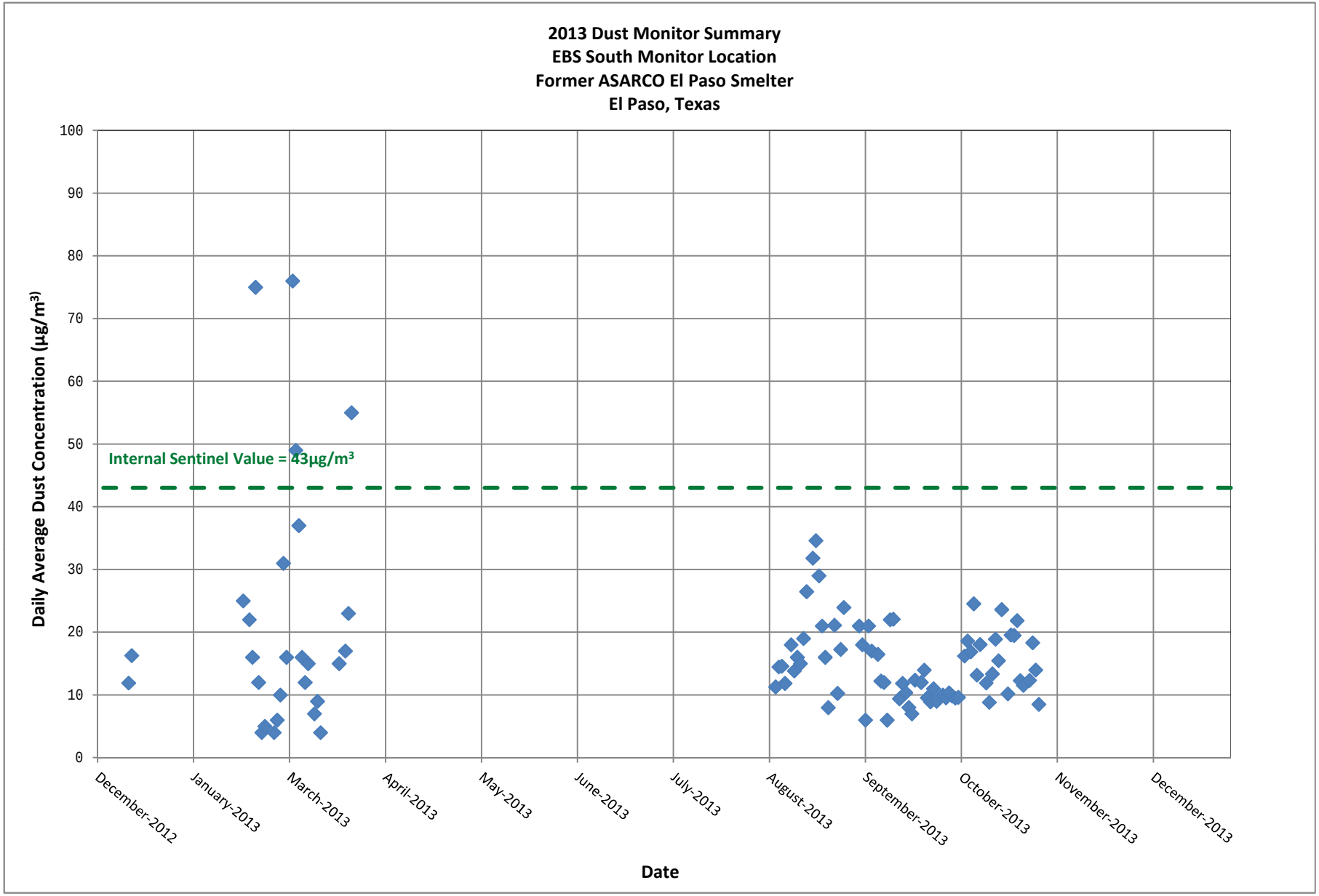

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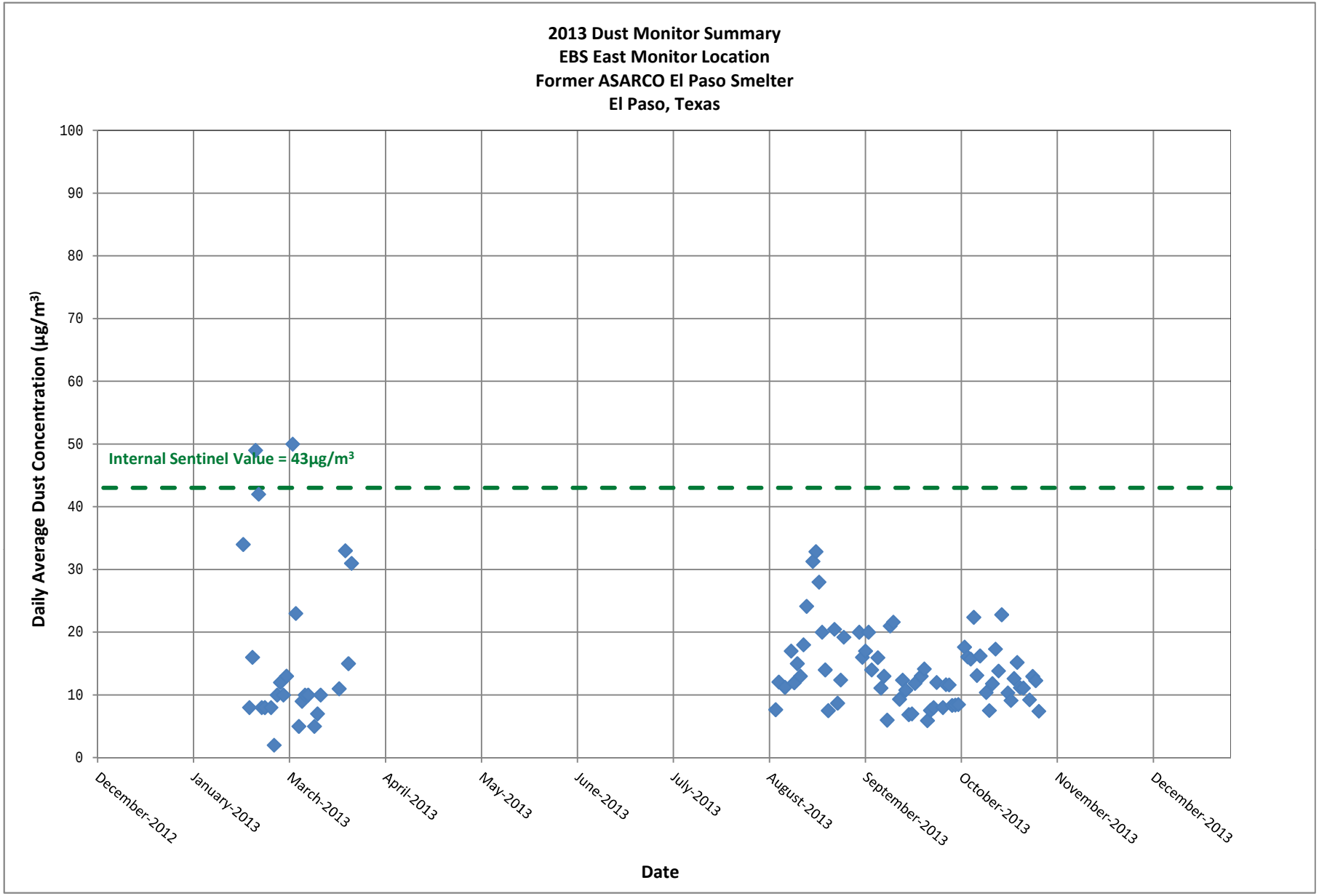
2013 Dust Monitor Summary
EBS East Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
100
90
80
70
60
50
40
30
20
10
0
Internal Sentinel Value = 43µg/m³
December-2012
January-2013
March-2013
April-2013
May-2013
June-2013
July-2013
August-2013
September-2013
October-2013
November-2013
December-2013
Date