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July 9, 2014

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

Subject: June 2014 Dust Monitoring and Landfill Air 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 June 2014. When activities during the month of June with the potential to generate dust were conducted onsite, dust data was collected from monitoring locations near the site fence line, around the arroyo and Category I landfill and near La Calavera. Activities on the east property have been completed for now and the three dust monitors (MP-11, MP-12 and MP-13) which were positioned on the east property have been decommissioned as of May 2014 until work resumes on the east property.

The following attachments are included with this letter:

- Attachment A: Routine Dust Monitoring Figure
- Attachment B: Wind Rose Plot
- Attachment C: Tables
- Attachment D: Dust Concentration Graphs

Dust monitor locations are shown in Attachment A, Figure 1. An onsite meteorological station was used to assess wind speed and direction. A Wind Rose Plot summarizing the wind data for the month is provided in Attachment B. Dust Concentration graphs for the calendar year is 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-1 monitor positioned in the Arroyo West location reported an error on June 14th. It was cleaned and fully functional by Monday June 16th. The monitors located on the east property are currently decommissioned since there is no activity on the east property. When activity commences on the east property the monitors will be re-positioned appropriately. Accordingly, as presented in Attachment C, Table 2 readings for the MP-1 (Arroyo West), MP-6 (North),

MP-11 through MP-13 (east property monitors) are represented by 'ND' for 'not deployed' for the dates the monitors were not functioning properly.

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. For the month of June all monitors remained in their same locations as the previous month, except for the east property monitors which are temporarily decommissioned.

ROUTINE DUST MONITORING DATA RESULTS & SUMMARY

A summary of the June elevated dust data is provided in Attachment C, Table 1, and the June 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 June with the following exceptions.

June 13th – The daily average dust concentration for the East and West monitors was greater than the sentinel value.

Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the southeast with a maximum wind gust speed of 55 mph and an average wind speed at 43 mph. A background dust evaluation was conducted on the elevated data using the upwind (South, Northeast and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West and Northwest and West (downwind) locations resulted in the actual average dust generated on site to be 9 $\mu g/m^3$ 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.

The real time dust concentrations will continue to be monitored during work activities.

Very truly yours,

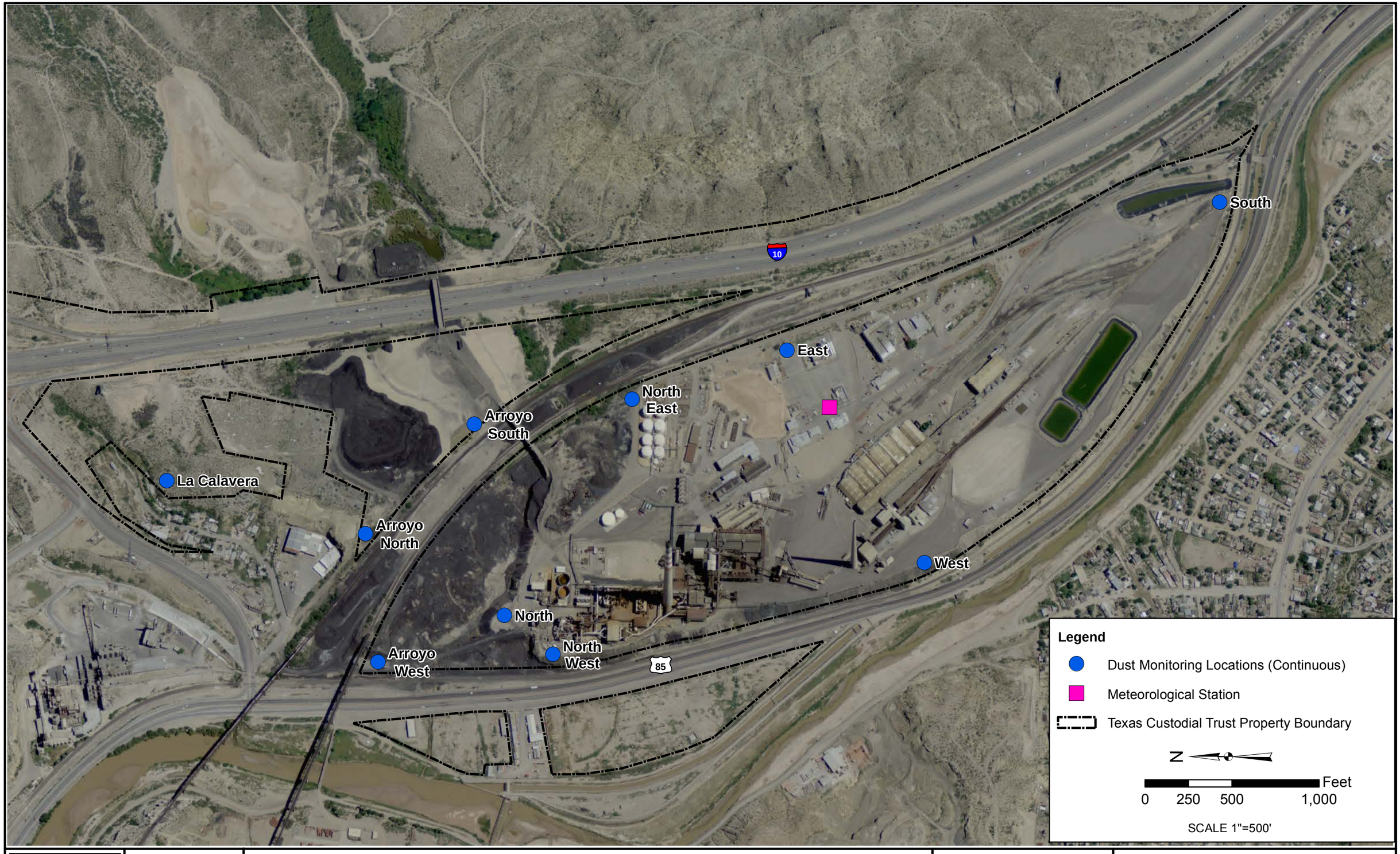
MALCOLM PIRNIE, INC.

Michael R Berry, P.E.
Principal Mechanical Engineer

Project 6835001
Attachments
cc: Former ASARCO Smelter Project Team

Attachment A

Figures



MALCOLM PIRNIE

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

Texas Custodial Trust
El Paso Smelter Site
Air Monitoring Plan

AIR MONITORING NETWORK

MAY 2014

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

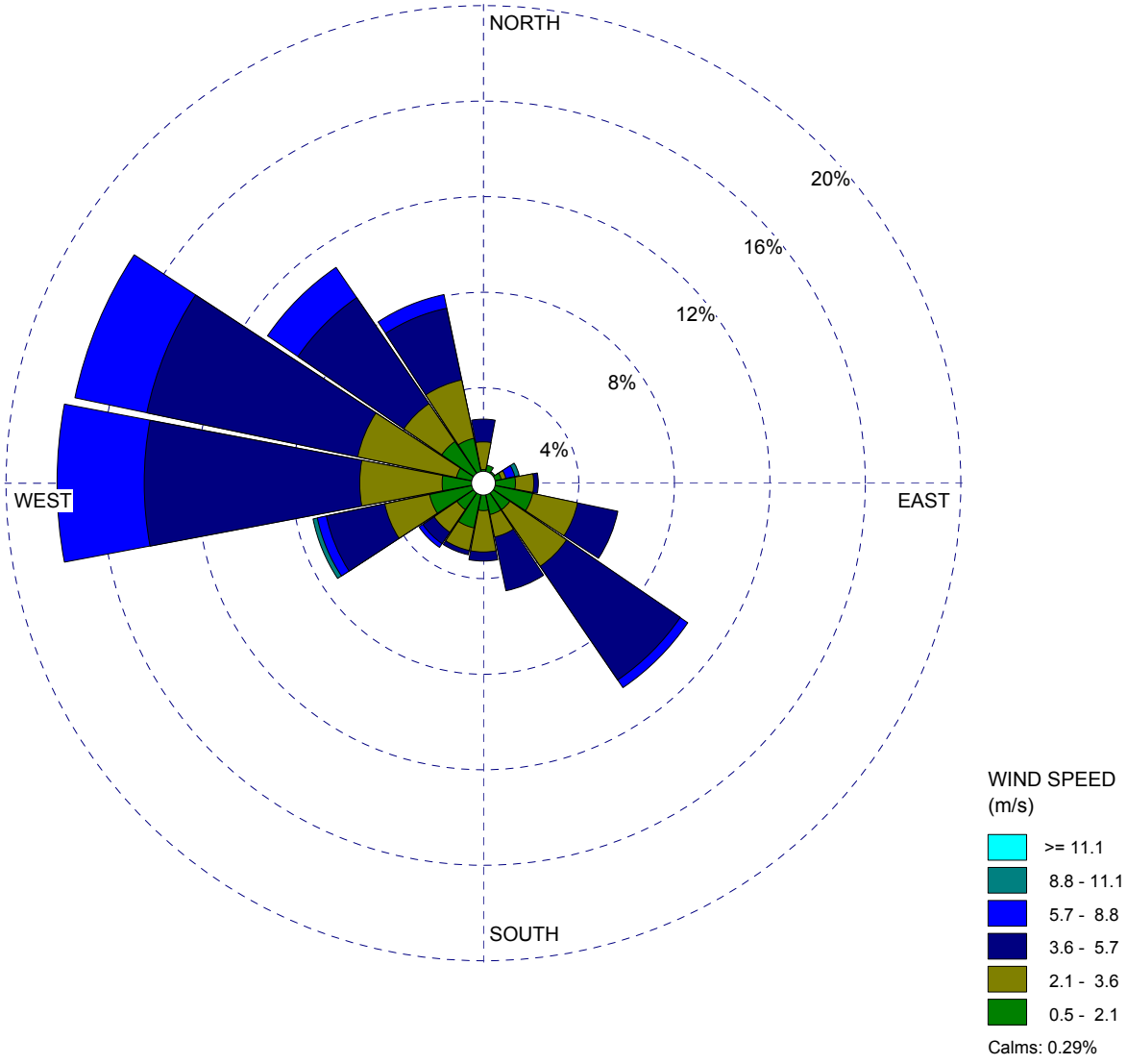
Wind Rose Plots

WIND ROSE PLOT:

Former ASARCO El Paso Smelter Remediation Site
June 2014 Wind Rose Plot

DISPLAY:

Wind Speed
Direction (blowing from)



COMMENTS: NOTE: Wind data was obtained from onsite meteorological station.	DATA PERIOD: **Start Date: 6/1/2014 - 00:00** **End Date: 6/30/2014 - 23:00**	COMPANY NAME: **Malcolm Pirnie, Inc**	
		MODELER: **Karina E Kenigsberg**	
	CALM WINDS: **0.29%**	TOTAL COUNT: **522 hrs.**	
	AVG. WIND SPEED: **3.67 m/s**	DATE: **7/2/2014**	PROJECT NO.: **06835001.2014**

Attachment C

Tables

TABLE 1

June Elevated Dust Monitor Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

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

Date	Location	Maximum Average Reading (µg/m^3)	Comments	Action
6/13/2014	East & West	65	The prevailing wind was from the southeast with a maximum wind gust speed of 55 mph and an average wind speed at 43 mph. A background dust evaluation was conducted on the elevated data using the upwind (South, Northeast and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West and Northwest 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.	Dust suppression was implemented during working hours to manage onsite dust generation.

TABLE 2

June Daily Average Dust Monitoring Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Week ending June 7th						
Date	Monday, June 02, 2014	Tuesday, June 03, 2014	Wednesday, June 04, 2014	Thursday, June 05, 2014	Friday, June 06, 2014	Saturday, June 07, 2014
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	18	27	19	13	19	19
Arroyo South	6	11	7	5	7	7
Arroyo North	11	20	12	8	13	12
La Calavera	11	20	12	10	14	13
Northeast	17	28	17	13	19	16
North	14	21	13	10	15	13
Northwest	16	24	15	11	16	15
East	17	25	19	12	18	17
South	15	23	14	9	14	17
West	20	27	24	15	22	21
EBS N	ND	ND	ND	ND	ND	ND
EBS S	ND	ND	ND	ND	ND	ND
EBS E	ND	ND	ND	ND	ND	ND
Week ending June 14th						
Date	Monday, June 09, 2014	Tuesday, June 10, 2014	Wednesday, June 11, 2014	Thursday, June 12, 2014	Friday, June 13, 2014	Saturday, June 14, 2014
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	23	20	18	14	29	ND
Arroyo South	10	6	7	6	21	7
Arroyo North	15	11	13	10	22	11
La Calavera	15	13	13	11	23	12
Northeast	17	16	19	13	38	16
North	15	15	15	12	33	13
Northwest	20	20	16	12	31	15
East	19	17	22	19	65	17
South	14	15	14	13	35	14
West	28	19	22	21	46	21
EBS N	ND	ND	ND	ND	ND	ND
EBS S	ND	ND	ND	ND	ND	ND
EBS E	ND	ND	ND	ND	ND	ND
Week ending June 21st						
Date	Monday, June 16, 2014	Tuesday, June 17, 2014	Wednesday, June 18, 2014	Thursday, June 19, 2014	Friday, June 20, 2014	Saturday, June 21, 2014
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	13	25	14	17	17	13
Arroyo South	4	10	6	7	5	5
Arroyo North	9	16	10	11	9	10
La Calavera	10	16	10	12	10	10
Northeast	13	23	20	17	14	13
North	11	17	11	13	12	11
Northwest	13	19	12	14	16	15
East	14	23	18	16	12	13
South	11	18	13	13	10	11
West	17	25	16	20	13	14
EBS N	ND	ND	ND	ND	ND	ND
EBS S	ND	ND	ND	ND	ND	ND
EBS E	ND	ND	ND	ND	ND	ND
Week ending June 28th						
Date	Monday, June 23, 2014	Tuesday, June 24, 2014	Wednesday, June 25, 2014	Thursday, June 26, 2014	Friday, June 27, 2014	Saturday, June 28, 2014
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	35	19	19	25	13	10
Arroyo South	8	8	9	8	9	4
Arroyo North	12	13	13	17	9	6
La Calavera	10	15	15	20	9	8
Northeast	15	19	19	26	16	9
North	13	15	15	16	10	8
Northwest	13	19	17	21	11	8
East	18	22	19	23	22	14
South	11	15	15	19	12	10
West	17	21	20	27	20	11
EBS N	ND	ND	ND	ND	ND	ND
EBS S	ND	ND	ND	ND	ND	ND
EBS E	ND	ND	ND	ND	ND	ND
Week ending July 5th						
Date	Monday, June 30, 2014	Tuesday, July 01, 2014	Wednesday, July 02, 2014	Thursday, July 03, 2014	Friday, July 04, 2014	Saturday, July 05, 2014
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	13					
Arroyo South	6					
Arroyo North	9					
La Calavera	7					
Northeast	13					
North	11					
Northwest	11					
East	16					
South	11					
West	28					
EBS N	ND					
EBS S	ND					
EBS E	ND					

NOTES:

1. Readings indicate PM_{10} dust based on direct read monitoring from TSI DustTrak II equipment.
2. Gray cell indicates that dust monitoring was not conducted that day because there were no 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.
5. Blue cell indicates that no data was recorded due to daylight saving time adjustment and lack of sufficient representative data.

Dust Monitor Summary
South Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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 $\mu g/m^3$ 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	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.
1/22/2014	South	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from approximately 5:00 P.M. to midnight when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.
1/29/2014	South	Dust suppression was implemented during working hours to manage onsite dust generation. The National Weather Service issued a Fire Weather Watch beginning in the evening until the following day. Critical fire weather conditions with increasing were present in the El Paso region in the evening. Wind gusts were recorded up to 13 mph with an average wind speed at 7 mph prevailing from the south southeast. A background dust evaluation was conducted on the elevated data using the upwind (South, EBS E and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Northwest, Arroyo West, Arroyo North, La Calavera and EBS N (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 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/19/2014	South	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the northeast with an average wind speed at 5 mph. A background dust evaluation was conducted on the elevated data using the upwind (La Calavera, Arroyo South, Arroyo North and EBS E) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, West, Northwest and EBS S (downwind) locations resulted in the actual average dust generated on site to be 34 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. 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
3/20/2014	South	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the southwest with a maximum wind gust speed of 18 mph and the average wind speed at 4 mph. A background dust evaluation was conducted on the elevated data using the upwind (South, West and Northwest) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the La Calavera and East (downwind) locations resulted in the actual average dust generated on site to be 9 $\mu g/m^3$ 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.
4/26/2014	South	A wind advisory warning was implemented for the El Paso area for April 25th and 26th. The prevailing wind was from the southwest with a maximum wind gust speed of 55 mph and the average wind speed at 23 mph with widespread dust present beginning in the afternoon and remaining in the area until late evening hours. A background dust evaluation was conducted on the elevated data using the upwind (South and West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, East and EBS S (downwind) locations resulted in the actual average dust generated on site to be 5 $\mu g/m^3$ 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
West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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.
10/10/2013	West	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.
11/4/2013	West	Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from 6:00PM to 10:00PM when the inversion layer formed again. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to area wide meteorological conditions.
11/26/2013	West	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer was present in the early morning hours and dissipated by noon and there were no recorded exceedances until after work hours from approximately 6:00PM to 11:00PM when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area wide meteorological conditions.

Dust Monitor Summary
West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
12/10/2013	West	Dust suppression was implemented during working hours to manage onsite dust generation. Wind gusts were recorded up to 23 mph with an average wind speed at 10 mph prevailing from the north. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo West, Arroyo North, La Calavera and North West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East, West and South (downwind) locations resulted in the actual average dust generated on site to be 27 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.
12/14/2013	West	Atmospheric inversions trap particulate matter in the air over the mountain basin in which El Paso is located. Stagnant air accumulates during the fall and winter months and inversions form most frequently in December, December, and January when there are long nights and short days. Since there is minimal moisture in the El Paso desert atmosphere during this time of year, strong nighttime cooling occurs under the clear skies. The air near the surface of the earth cools more rapidly than the air above, and forms a nighttime inversion which traps particulate matter. During the morning, the strong desert heating begins to break the inversion around noon. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from approximately 6:00PM to 11:00PM when the inversion layer formed again. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to area wide meteorological conditions.
1/7/2014	West	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by 10:00A.M., and there were no recorded exceedances in the afternoon until after work hours from approximately 6:00P.M. to 11:00P.M. when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.
1/17/2014	West	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by 10:00A.M., and there were no recorded exceedances in the afternoon until after work hours from approximately 6:00P.M. to midnight when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.
1/18/2014	West	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from approximately 7:00 P.M. to midnight when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.

Dust Monitor Summary
West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
1/21/2014	West	Dust suppression was implemented during working hours to manage onsite dust generation. Evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. All monitors reported instantaneous exceedances during the time the inversion layer occurred. The average dust concentration during the working hours was below the sentinel value for all monitors. There were no recorded exceedances in the afternoon until after work hours from approximately 5:00P.M. to midnight when the inversion layer formed. The elevated dust concentration for the day is attributed to area-wide meteorological conditions.
1/22/2014	West	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from approximately 5:00 P.M. to midnight when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.
1/23/2014	West	Dust suppression was implemented during working hours to manage onsite dust generation. A high wind advisory was for the El Paso Region. Wind gusts were recorded up to 31 mph with an average wind speed at 12 mph prevailing from the east. A background dust evaluation was conducted on the elevated data using the upwind (East, Northeast and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the West, Northwest, and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 29 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/29/2014	West	Dust suppression was implemented during working hours to manage onsite dust generation. The National Weather Service issued a Fire Weather Watch beginning in the evening until the following day. Critical fire weather conditions with increasing were present in the El Paso region in the evening. Wind gusts were recorded up to 13 mph with an average wind speed at 7 mph prevailing from the south southeast. A background dust evaluation was conducted on the elevated data using the upwind (South, EBS E and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Northwest, Arroyo West, Arroyo North, La Calavera and EBS N (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 $\mu g/m^3$. 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
3/12/2014	West	Dust suppression was implemented during working hours to manage onsite dust generation. A wind advisory warning was implemented for the El Paso area for March 11th through March 12th. The prevailing wind was from the northeast with a maximum wind gust speed of 31 mph and the average wind speed at 13 mph with widespread dust present in the early morning hours. As previously indicated, the MP-1 and MP-10 monitors recorded half a day's worth of data during this time period and subsequent dust concentrations for this day are not representative daily average dust concentrations. However, a background dust evaluation was conducted on the elevated data using the upwind (La Calavera, Arroyo South, Arroyo North and EBS E) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, West, Northwest and EBS S (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 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/13/2014	West	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the northeast with an average wind speed at 5 mph. The MP-1 and MP-10 monitors recorded half a day's worth of data during this time period as previously indicated and subsequent dust concentrations for this day are not representative daily average dust concentrations. However, a background dust evaluation was conducted on the elevated data using the upwind (La Calavera, Arroyo South, Arroyo North and EBS E) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, West, Northwest and EBS S (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 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/19/2014	West	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the northeast with an average wind speed at 5 mph. A background dust evaluation was conducted on the elevated data using the upwind (La Calavera, Arroyo South, Arroyo North and EBS E) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, West, Northwest and EBS S (downwind) locations resulted in the actual average dust generated on site to be 34 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/20/2014	West	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the southwest with a maximum wind gust speed of 18 mph and the average wind speed at 4 mph. A background dust evaluation was conducted on the elevated data using the upwind (South, West and Northwest) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the La Calavera and East (downwind) locations resulted in the actual average dust generated on site to be 9 $\mu g/m^3$ 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
West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
4/26/2014	West	A wind advisory warning was implemented for the El Paso area for April 25th and 26th. The prevailing wind was from the southwest with a maximum wind gust speed of 55 mph and the average wind speed at 23 mph with widespread dust present beginning in the afternoon and remaining in the area until late evening hours. A background dust evaluation was conducted on the elevated data using the upwind (South and West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, East and EBS S (downwind) locations resulted in the actual average dust generated on site to be 5 $\mu g/m^3$ 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.
5/6/2014	West	A wind advisory warning was issued May 6th from the afternoon to evening hours. The prevailing wind was from the southwest with a maximum wind gust speed of 63 mph and the average wind speed at 10 mph with widespread dust present beginning in the afternoon and remaining in the area until evening hours. 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 West and East (downwind) locations resulted in the actual average dust generated on site to be 19 $\mu g/m^3$ 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.
5/7/2014	West	A wind advisory warning was issued May 7th from the early morning to evening hours. The prevailing wind was from the southwest with a maximum wind gust speed of 63 mph and the average wind speed at 10 mph with widespread dust present beginning in the afternoon and remaining in the area until evening hours. 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 West and East (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 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
6/13/2014	West	The prevailing wind was from the southeast with a maximum wind gust speed of 55 mph and an average wind speed at 43 mph. A background dust evaluation was conducted on the elevated data using the upwind (South, Northeast and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West and Northwest and West (downwind) locations resulted in the actual average dust generated on site to be 9 $\mu g/m^3$ 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
North West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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 $\mu g/m^3$ 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.
4/9/2013	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 $\mu g/m^3$ 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	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 $\mu g/m^3$ 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.
1/22/2014	North West	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from approximately 5:00 P.M. to midnight when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.

Dust Monitor Summary
North West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
1/29/2014	North West	Dust suppression was implemented during working hours to manage onsite dust generation. The National Weather Service issued a Fire Weather Watch beginning in the evening until the following day. Critical fire weather conditions with increasing were present in the El Paso region in the evening. Wind gusts were recorded up to 13 mph with an average wind speed at 7 mph prevailing from the south southeast. A background dust evaluation was conducted on the elevated data using the upwind (South, EBS E and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Northwest, Arroyo West, Arroyo North, La Calavera and EBS N (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 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/19/2014	North West	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the northeast with an average wind speed at 5 mph. A background dust evaluation was conducted on the elevated data using the upwind (La Calavera, Arroyo South, Arroyo North and EBS E) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, West, Northwest and EBS S (downwind) locations resulted in the actual average dust generated on site to be 34 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/20/2014	North West	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the southwest with a maximum wind gust speed of 18 mph and the average wind speed at 4 mph. A background dust evaluation was conducted on the elevated data using the upwind (South, West and Northwest) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the La Calavera and East (downwind) locations resulted in the actual average dust generated on site to be 9 $\mu g/m^3$ 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.
4/26/2014	North West	A wind advisory warning was implemented for the El Paso area for April 25th and 26th. The prevailing wind was from the southwest with a maximum wind gust speed of 55 mph and the average wind speed at 23 mph with widespread dust present beginning in the afternoon and remaining in the area until late evening hours. A background dust evaluation was conducted on the elevated data using the upwind (South and West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, East and EBS S (downwind) locations resulted in the actual average dust generated on site to be 5 $\mu g/m^3$ 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.
5/7/2014	North West	A wind advisory warning was issued May 7th from the early morning to evening hours. The prevailing wind was from the southwest with a maximum wind gust speed of 63 mph and the average wind speed at 10 mph with widespread dust present beginning in the afternoon and remaining in the area until evening hours. 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 West and East (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 $\mu g/m^3$. 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 $\mu g/m^3$ 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.
1/22/2014	North	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from approximately 5:00 P.M. to midnight when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.
1/29/2014	North	Dust suppression was implemented during working hours to manage onsite dust generation. The National Weather Service issued a Fire Weather Watch beginning in the evening until the following day. Critical fire weather conditions with increasing were present in the El Paso region in the evening. Wind gusts were recorded up to 13 mph with an average wind speed at 7 mph prevailing from the south southeast. A background dust evaluation was conducted on the elevated data using the upwind (South, EBS E and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Northwest, Arroyo West, Arroyo North, La Calavera and EBS N (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 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/19/2014	North	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the northeast with an average wind speed at 5 mph. A background dust evaluation was conducted on the elevated data using the upwind (La Calavera, Arroyo South, Arroyo North and EBS E) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, West, Northwest and EBS S (downwind) locations resulted in the actual average dust generated on site to be 34 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/20/2014	North	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the southwest with a maximum wind gust speed of 18 mph and the average wind speed at 4 mph. A background dust evaluation was conducted on the elevated data using the upwind (South, West and Northwest) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the La Calavera and East (downwind) locations resulted in the actual average dust generated on site to be 9 $\mu g/m^3$ 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
North East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
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 $\mu g/m^3$ 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.
1/18/2014	North East	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from approximately 7:00 P.M. to midnight when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.
1/22/2014	North East	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from approximately 5:00 P.M. to midnight when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.
1/27/2014	North East	Dust suppression was implemented during working hours to manage onsite dust generation. Wind gusts were recorded up to 26 mph with an average wind speed at 7 mph prevailing from the southeast. Furthermore, approximately half a day's worth of data was recorded on these monitors, which partly skews the data and makes it not fully representative of the day's activity. Irrespective of the lack of data, a background dust evaluation was conducted on the elevated data using the upwind (South, EBS E and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Northwest, Arroyo West, Arroyo North, La Calavera and EBS N (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 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/29/2014	North East	Dust suppression was implemented during working hours to manage onsite dust generation. The National Weather Service issued a Fire Weather Watch beginning in the evening until the following day. Critical fire weather conditions with increasing were present in the El Paso region in the evening. Wind gusts were recorded up to 13 mph with an average wind speed at 7 mph prevailing from the south southeast. A background dust evaluation was conducted on the elevated data using the upwind (South, EBS E and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Northwest, Arroyo West, Arroyo North, La Calavera and EBS N (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 $\mu g/m^3$. 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
3/19/2014	North East	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the northeast with an average wind speed at 5 mph. A background dust evaluation was conducted on the elevated data using the upwind (La Calavera, Arroyo South, Arroyo North and EBS E) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, West, Northwest and EBS S (downwind) locations resulted in the actual average dust generated on site to be 34 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.
3/20/2014	North East	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the southwest with a maximum wind gust speed of 18 mph and the average wind speed at 4 mph. A background dust evaluation was conducted on the elevated data using the upwind (South, West and Northwest) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the La Calavera and 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.
4/26/2014	North East	A wind advisory warning was implemented for the El Paso area for April 25th and 26th. The prevailing wind was from the southwest with a maximum wind gust speed of 55 mph and the average wind speed at 23 mph with widespread dust present beginning in the afternoon and remaining in the area until late evening hours. A background dust evaluation was conducted on the elevated data using the upwind (South and West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, East and EBS S (downwind) locations resulted in the actual average dust generated on site to be 5 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.
5/6/2014	North East	A wind advisory warning was issued May 6th from the afternoon to evening hours. The prevailing wind was from the southwest with a maximum wind gust speed of 63 mph and the average wind speed at 10 mph with widespread dust present beginning in the afternoon and remaining in the area until evening hours. 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 West and East (downwind) locations resulted in the actual average dust generated on site to be 19 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.
5/7/2014	North East	A wind advisory warning was issued May 7th from the early morning to evening hours. The prevailing wind was from the southwest with a maximum wind gust speed of 63 mph and the average wind speed at 10 mph with widespread dust present beginning in the afternoon and remaining in the area until evening hours. 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 West and East (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. 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
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 $\mu g/m^3$ 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.
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 $\mu g/m^3$ 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.
10/10/2013	East	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.
10/19/2013	East	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.
11/4/2013	East	Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from 6:00PM to 10:00PM when the inversion layer formed again. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to area wide meteorological conditions.

Dust Monitor Summary
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
11/9/2013	East	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from 6:00PM to 10:00PM when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area wide meteorological conditions.
11/14/2013	East	Dust suppression was implemented during working hours to manage onsite dust generation. Winds and widespread dust were present between 8:00PM and 11:00PM in the area surrounding the site. High winds prevailed from the south. A background dust evaluation was conducted on the elevated data using the upwind (South and West) locations. Subtracting the daily average background dust concentration at the upwind locations from the daily average dust concentration for the Arroyo West, Northwest, Arroyo North, La Calavera and Arroyo South (downwind) locations resulted in the actual average dust generated on site to be 15 $\mu g/m^3$ 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.
11/25/2013	East	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer was present in the early morning hours and dissipated by noon and there were no recorded exceedances until after work hours from approximately 6:00PM to 11:00PM when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area wide meteorological conditions.
11/26/2013	East	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer was present in the early morning hours and dissipated by noon and there were no recorded exceedances until after work hours from approximately 6:00PM to 11:00PM when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area wide meteorological conditions.
12/4/2013	East	Dust suppression was implemented during working hours to manage onsite dust generation. A high wind advisory was for the El Paso Region. Wind gusts were recorded up to 51 mph with an average wind speed at 23 mph prevailing from the southwest. A background dust evaluation was conducted on the elevated data using the upwind (West, South, and North West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East, North East, and La Calavera (downwind) locations resulted in the actual average dust generated on site to be 22 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.

Dust Monitor Summary
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
12/9/2013	East	Dust suppression was implemented during working hours to manage onsite dust generation. Wind gusts were recorded up to 33 mph with an average wind speed at 11 mph prevailing from the north northwest. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo West, West and North West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East, North East and South (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 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
12/10/2013	East	Dust suppression was implemented during working hours to manage onsite dust generation. Wind gusts were recorded up to 23 mph with an average wind speed at 10 mph prevailing from the north. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo West, Arroyo North, La Calavera and North West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East, West and South (downwind) locations resulted in the actual average dust generated on site to be 27 $\mu g/m^3$ 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.
12/14/2013	East	Atmospheric inversions trap particulate matter in the air over the mountain basin in which El Paso is located. Stagnant air accumulates during the fall and winter months and inversions form most frequently in December, December, and January when there are long nights and short days. Since there is minimal moisture in the El Paso desert atmosphere during this time of year, strong nighttime cooling occurs under the clear skies. The air near the surface of the earth cools more rapidly than the air above, and forms a nighttime inversion which traps particulate matter. During the morning, the strong desert heating begins to break the inversion around noon. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from approximately 6:00PM to 11:00PM when the inversion layer formed again. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to area wide meteorological conditions.
12/17/2013	East	Dust suppression was implemented during working hours to manage onsite dust generation. An evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer was present after work hours from approximately 6:00PM to 11:00PM and there were no recorded exceedances during working hours. The elevated dust concentrations for the day are attributed to area wide meteorological conditions.
12/18/2013	East	Dust suppression was implemented during working hours to manage onsite dust generation. An evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer was present after work hours from approximately 6:00PM to 11:00PM and there were no recorded exceedances during working hours. The elevated dust concentrations for the day are attributed to area wide meteorological conditions.

Dust Monitor Summary
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
1/7/2014	East	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by 10:00A.M., and there were no recorded exceedances in the afternoon until after work hours from approximately 6:00P.M. to 11:00P.M. when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.
1/11/2014	East	Dust suppression was implemented during working hours to manage onsite dust generation. Late evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. While only one monitor had a daily average dust concentration over the sentinel value, all monitors reported instantaneous exceedances during the time the inversion layer occurred. Furthermore, the average dust concentration during the working hours was below the sentinel value for all monitors. There were no recorded exceedances in the afternoon until after work hours from approximately 6:00P.M. to midnight when the inversion layer formed. The elevated dust concentration for the day is attributed to area-wide meteorological conditions.
1/14/2014	East	Dust suppression was implemented during working hours to manage onsite dust generation. Late evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. While only one monitor had a daily average dust concentration over the sentinel value, all monitors reported instantaneous exceedances during the time the inversion layer occurred. Furthermore, the average dust concentration during the working hours was below the sentinel value for all monitors. There were no recorded exceedances in the afternoon until after work hours from approximately 6:00PM to midnight when the inversion layer formed. The elevated dust concentration for the day is attributed to area-wide meteorological conditions.
1/15/2014	East	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. While only one monitor had a daily average dust concentration over the sentinel value, all monitors reported instantaneous exceedances during the time the inversion layer occurred. The inversion layer dissipated by noon and the average dust concentration during the working hours was below the sentinel value for all monitors. The elevated dust concentration for the day is attributed to area-wide meteorological conditions.
1/16/2014	East	Dust suppression was implemented during working hours to manage onsite dust generation. Late evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. While only one monitor had a daily average dust concentration over the sentinel value, all monitors reported instantaneous exceedances during the time the inversion layer occurred. Furthermore, the average dust concentration during the working hours was below the sentinel value for all monitors. There were no recorded exceedances in the afternoon until after work hours from approximately 6:00P.M. to midnight when the inversion layer formed. The elevated dust concentration for the day is attributed to area-wide meteorological conditions.

Dust Monitor Summary
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
1/17/2014	East	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by 10:00A.M., and there were no recorded exceedances in the afternoon until after work hours from approximately 6:00P.M. to midnight when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.
1/18/2014	East	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from approximately 7:00 P.M. to midnight when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.
1/21/2014	East	Dust suppression was implemented during working hours to manage onsite dust generation. Evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. All monitors reported instantaneous exceedances during the time the inversion layer occurred. The average dust concentration during the working hours was below the sentinel value for all monitors. There were no recorded exceedances in the afternoon until after work hours from approximately 5:00P.M. to midnight when the inversion layer formed. The elevated dust concentration for the day is attributed to area-wide meteorological conditions.
1/22/2014	East	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from approximately 5:00 P.M. to midnight when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.
1/23/2014	East	Dust suppression was implemented during working hours to manage onsite dust generation. A high wind advisory was for the El Paso Region. Wind gusts were recorded up to 31 mph with an average wind speed at 12 mph prevailing from the east. A background dust evaluation was conducted on the elevated data using the upwind (East, Northeast and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the West, Northwest, and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 29 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.

Dust Monitor Summary
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
1/27/2014	East	Dust suppression was implemented during working hours to manage onsite dust generation. Wind gusts were recorded up to 26 mph with an average wind speed at 7 mph prevailing from the southeast. Furthermore, approximately half a day's worth of data was recorded on these monitors, which partly skews the data and makes it not fully representative of the day's activity. Irrespective of the lack of data, a background dust evaluation was conducted on the elevated data using the upwind (South, EBS E and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Northwest, Arroyo West, Arroyo North, La Calavera and EBS N (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 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/29/2014	East	Dust suppression was implemented during working hours to manage onsite dust generation. The National Weather Service issued a Fire Weather Watch beginning in the evening until the following day. Critical fire weather conditions with increasing were present in the El Paso region in the evening. Wind gusts were recorded up to 13 mph with an average wind speed at 7 mph prevailing from the south southeast. A background dust evaluation was conducted on the elevated data using the upwind (South, EBS E and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Northwest, Arroyo West, Arroyo North, La Calavera and EBS N (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 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
1/30/2014	East	Dust suppression was implemented during working hours to manage onsite dust generation. The National Weather Service issued a Fire Weather Watch beginning the preceding day until the evening on January 30th. Critical fire weather conditions with increasing were present in the El Paso region throughout the day. Wind gusts were recorded up to 38 mph with an average wind speed at 15 mph prevailing from the southwest. A background dust evaluation was conducted on the elevated data using the upwind (South, West and Northwest) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East, La Calavera and Arroyo 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.
2/5/2014	East	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by 5:00A.M. and reappeared at around 5:00P.M. where it remained until around 11:00P.M. The prevailing wind was from the east with a maximum wind gust speed of 23 mph and the average wind speed at 9 mph. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo South, Arroyo North and EBS E) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, Northwest and EBS S (downwind) locations resulted in the actual average dust generated on site to be 11 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.

Dust Monitor Summary
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
2/6/2014	East	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the northeast with a maximum wind gust speed of 17 mph and the average wind speed at 6 mph. A background dust evaluation was conducted on the elevated data using the upwind (La Calavera, Arroyo South, Arroyo North and EBS E) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, West, Northwest and EBS S (downwind) locations resulted in the actual average dust generated on site to be 8 $\mu g/m^3$ 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.
3/19/2014	East	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the northeast with an average wind speed at 5 mph. A background dust evaluation was conducted on the elevated data using the upwind (La Calavera, Arroyo South, Arroyo North and EBS E) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, West, Northwest and EBS S (downwind) locations resulted in the actual average dust generated on site to be 34 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/20/2014	East	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the southwest with a maximum wind gust speed of 18 mph and the average wind speed at 4 mph. A background dust evaluation was conducted on the elevated data using the upwind (South, West and Northwest) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the La Calavera and East (downwind) locations resulted in the actual average dust generated on site to be 9 $\mu g/m^3$ 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.
4/2/2014	East	A wind advisory warning was implemented for the El Paso area for April 2nd. The prevailing wind was from the southwest with a maximum wind gust speed of 45 mph and the average wind speed at 22 mph with widespread dust present beginning in the afternoon and remaining in the area until late evening hours. A background dust evaluation was conducted on the elevated data using the upwind (South and West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, East and EBS S (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 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/26/2014	East	A wind advisory warning was implemented for the El Paso area for April 25th and 26th. The prevailing wind was from the southwest with a maximum wind gust speed of 55 mph and the average wind speed at 23 mph with widespread dust present beginning in the afternoon and remaining in the area until late evening hours. A background dust evaluation was conducted on the elevated data using the upwind (South and West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, East and EBS S (downwind) locations resulted in the actual average dust generated on site to be 5 $\mu g/m^3$ 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
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
5/6/2014	East	A wind advisory warning was issued May 6th from the afternoon to evening hours. The prevailing wind was from the southwest with a maximum wind gust speed of 63 mph and the average wind speed at 10 mph with widespread dust present beginning in the afternoon and remaining in the area until evening hours. 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 West and East (downwind) locations resulted in the actual average dust generated on site to be 19 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.
5/7/2014	East	A wind advisory warning was issued May 7th from the early morning to evening hours. The prevailing wind was from the southwest with a maximum wind gust speed of 63 mph and the average wind speed at 10 mph with widespread dust present beginning in the afternoon and remaining in the area until evening hours. 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 West and East (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. The elevated dust concentrations for the day are attributed to meteorological conditions.
6/13/2014	East	The prevailing wind was from the southeast with a maximum wind gust speed of 55 mph and an average wind speed at 43 mph. A background dust evaluation was conducted on the elevated data using the upwind (South, Northeast and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West and Northwest 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.

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 $\mu g/m^3$ 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.
11/12/2013	Calavera	Dust suppression was implemented during working hours to manage onsite dust generation. A high wind advisory was issued by the National Weather Service for the El Paso region. Winds and widespread dust were present between 12:00PM and 5:00PM in the area surrounding the site. High winds prevailed from the northeast. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo North, Arroyo South and Northeast and EBS N) locations. Subtracting the daily average background dust concentration at the upwind locations from the daily average dust concentration for the West and EBS S (downwind) locations resulted in the actual average dust generated on site to be 8 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. Most monitors located in the northeastern part of the property had elevated dust readings throughout the day with the La Calavera monitor which is closest to the northeastern property line showing the highest daily average concentration. The elevated dust concentrations for the day are attributed to offsite conditions.
12/14/2013	Calavera	Atmospheric inversions trap particulate matter in the air over the mountain basin in which El Paso is located. Stagnant air accumulates during the fall and winter months and inversions form most frequently in December, December, and January when there are long nights and short days. Since there is minimal moisture in the El Paso desert atmosphere during this time of year, strong nighttime cooling occurs under the clear skies. The air near the surface of the earth cools more rapidly than the air above, and forms a nighttime inversion which traps particulate matter. During the morning, the strong desert heating begins to break the inversion around noon. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from approximately 6:00PM to 11:00PM when the inversion layer formed again. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to area wide meteorological conditions.
1/22/2014	Calavera	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from approximately 5:00 P.M. to midnight when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.

Dust Monitor Summary
Calavera Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
1/23/2014	Calavera	Dust suppression was implemented during working hours to manage onsite dust generation. A high wind advisory was for the El Paso Region. Wind gusts were recorded up to 31 mph with an average wind speed at 12 mph prevailing from the east. A background dust evaluation was conducted on the elevated data using the upwind (East, Northeast and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the West, Northwest, and Arroyo West (downwind) locations resulted in the actual average dust generated on site to be 29 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.
1/29/2014	Calavera	Dust suppression was implemented during working hours to manage onsite dust generation. The National Weather Service issued a Fire Weather Watch beginning in the evening until the following day. Critical fire weather conditions with increasing were present in the El Paso region in the evening. Wind gusts were recorded up to 13 mph with an average wind speed at 7 mph prevailing from the south southeast. A background dust evaluation was conducted on the elevated data using the upwind (South, EBS E and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Northwest, Arroyo West, Arroyo North, La Calavera and EBS N (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. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/19/2014	Calavera	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the northeast with an average wind speed at 5 mph. A background dust evaluation was conducted on the elevated data using the upwind (La Calavera, Arroyo South, Arroyo North and EBS E) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, West, Northwest and EBS S (downwind) locations resulted in the actual average dust generated on site to be 34 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.
3/20/2014	Calavera	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the southwest with a maximum wind gust speed of 18 mph and the average wind speed at 4 mph. A background dust evaluation was conducted on the elevated data using the upwind (South, West and Northwest) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the La Calavera and 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.
4/26/2014	Calavera	A wind advisory warning was implemented for the El Paso area for April 25th and 26th. The prevailing wind was from the southwest with a maximum wind gust speed of 55 mph and the average wind speed at 23 mph with widespread dust present beginning in the afternoon and remaining in the area until late evening hours. A background dust evaluation was conducted on the elevated data using the upwind (South and West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, East and EBS S (downwind) locations resulted in the actual average dust generated on site to be 5 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
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.
11/26/2013	Arroyo West	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer was present in the early morning hours and dissipated by noon and there were no recorded exceedances until after work hours from approximately 6:00PM to 11:00PM when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area wide meteorological conditions.
12/14/2013	Arroyo West	Atmospheric inversions trap particulate matter in the air over the mountain basin in which El Paso is located. Stagnant air accumulates during the fall and winter months and inversions form most frequently in December, December, and January when there are long nights and short days. Since there is minimal moisture in the El Paso desert atmosphere during this time of year, strong nighttime cooling occurs under the clear skies. The air near the surface of the earth cools more rapidly than the air above, and forms a nighttime inversion which traps particulate matter. During the morning, the strong desert heating begins to break the inversion around noon. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from approximately 6:00PM to 11:00PM when the inversion layer formed again. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to area wide meteorological conditions.
1/17/2014	Arroyo West	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by 10:00A.M., and there were no recorded exceedances in the afternoon until after work hours from approximately 6:00P.M. to midnight when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.
1/18/2014	Arroyo West	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from approximately 7:00 P.M. to midnight when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.

Dust Monitor Summary
Arroyo West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
1/22/2014	Arroyo West	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from approximately 5:00 P.M. to midnight when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.
1/29/2014	Arroyo West	Dust suppression was implemented during working hours to manage onsite dust generation. The National Weather Service issued a Fire Weather Watch beginning in the evening until the following day. Critical fire weather conditions with increasing were present in the El Paso region in the evening. Wind gusts were recorded up to 13 mph with an average wind speed at 7 mph prevailing from the south southeast. A background dust evaluation was conducted on the elevated data using the upwind (South, EBS E and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Northwest, Arroyo West, Arroyo North, La Calavera and EBS N (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 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/12/2014	Arroyo West	Dust suppression was implemented during working hours to manage onsite dust generation. A wind advisory warning was implemented for the El Paso area for March 11th through March 12th. The prevailing wind was from the northeast with a maximum wind gust speed of 31 mph and the average wind speed at 13 mph with widespread dust present in the early morning hours. As previously indicated, the MP-1 and MP-10 monitors recorded half a day's worth of data during this time period and subsequent dust concentrations for this day are not representative daily average dust concentrations. However, a background dust evaluation was conducted on the elevated data using the upwind (La Calavera, Arroyo South, Arroyo North and EBS E) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, West, Northwest and EBS S (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 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/13/2014	Arroyo West	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the northeast with an average wind speed at 5 mph. The MP-1 and MP-10 monitors recorded half a day's worth of data during this time period as previously indicated and subsequent dust concentrations for this day are not representative daily average dust concentrations. However, a background dust evaluation was conducted on the elevated data using the upwind (La Calavera, Arroyo South, Arroyo North and EBS E) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, West, Northwest and EBS S (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 $\mu g/m^3$. 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
3/19/2014	Arroyo West	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the northeast with an average wind speed at 5 mph. A background dust evaluation was conducted on the elevated data using the upwind (La Calavera, Arroyo South, Arroyo North and EBS E) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, West, Northwest and EBS S (downwind) locations resulted in the actual average dust generated on site to be 34 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/20/2014	Arroyo West	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the southwest with a maximum wind gust speed of 18 mph and the average wind speed at 4 mph. A background dust evaluation was conducted on the elevated data using the upwind (South, West and Northwest) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the La Calavera and East (downwind) locations resulted in the actual average dust generated on site to be 9 $\mu g/m^3$ 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.
4/2/2014	Arroyo West	A wind advisory warning was implemented for the El Paso area for April 2nd. The prevailing wind was from the southwest with a maximum wind gust speed of 45 mph and the average wind speed at 22 mph with widespread dust present beginning in the afternoon and remaining in the area until late evening hours. A background dust evaluation was conducted on the elevated data using the upwind (South and West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, East and EBS S (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 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/26/2014	Arroyo West	A wind advisory warning was implemented for the El Paso area for April 25th and 26th. The prevailing wind was from the southwest with a maximum wind gust speed of 55 mph and the average wind speed at 23 mph with widespread dust present beginning in the afternoon and remaining in the area until late evening hours. A background dust evaluation was conducted on the elevated data using the upwind (South and West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, East and EBS S (downwind) locations resulted in the actual average dust generated on site to be 5 $\mu g/m^3$ 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.
5/7/2014	Arroyo West	A wind advisory warning was issued May 7th from the early morning to evening hours. The prevailing wind was from the southwest with a maximum wind gust speed of 63 mph and the average wind speed at 10 mph with widespread dust present beginning in the afternoon and remaining in the area until evening hours. 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 West and East (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 $\mu g/m^3$. 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
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.
4/26/2014	Arroyo South	A wind advisory warning was implemented for the El Paso area for April 25th and 26th. The prevailing wind was from the southwest with a maximum wind gust speed of 55 mph and the average wind speed at 23 mph with widespread dust present beginning in the afternoon and remaining in the area until late evening hours. A background dust evaluation was conducted on the elevated data using the upwind (South and West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, East and EBS S (downwind) locations resulted in the actual average dust generated on site to be 5 $\mu g/m^3$ 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.

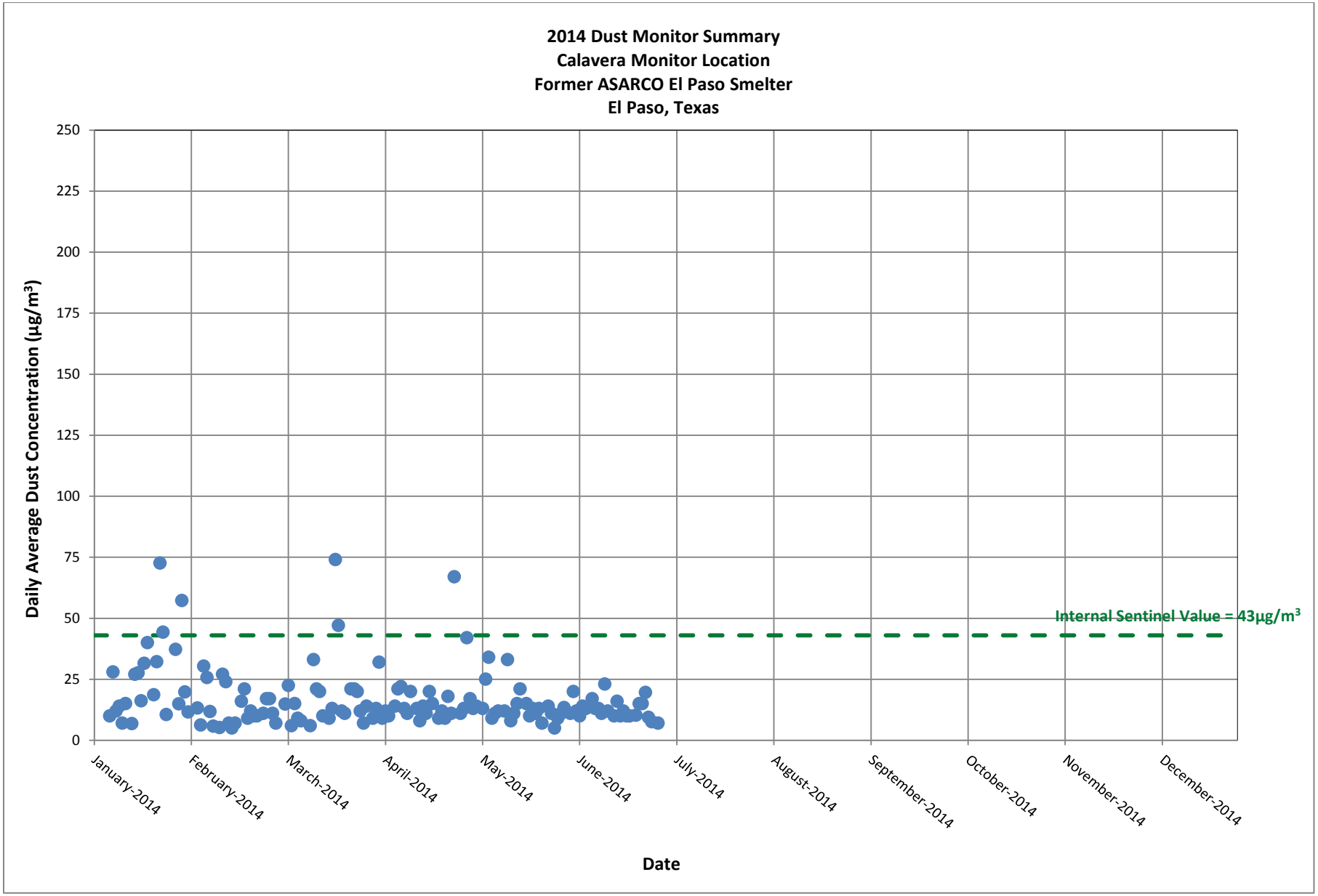
Dust Monitor Summary
Arroyo North Elevated Data Summary

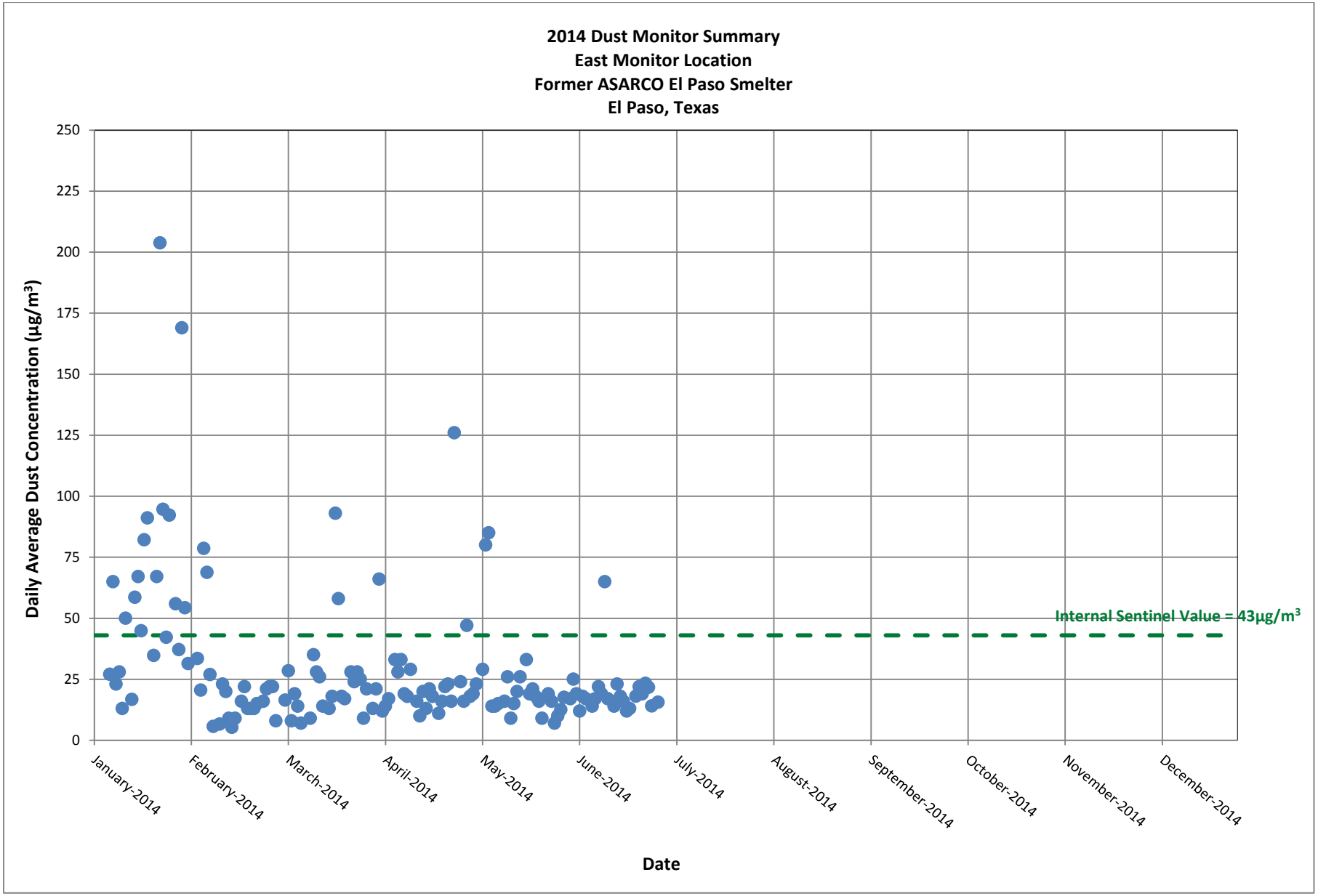
Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

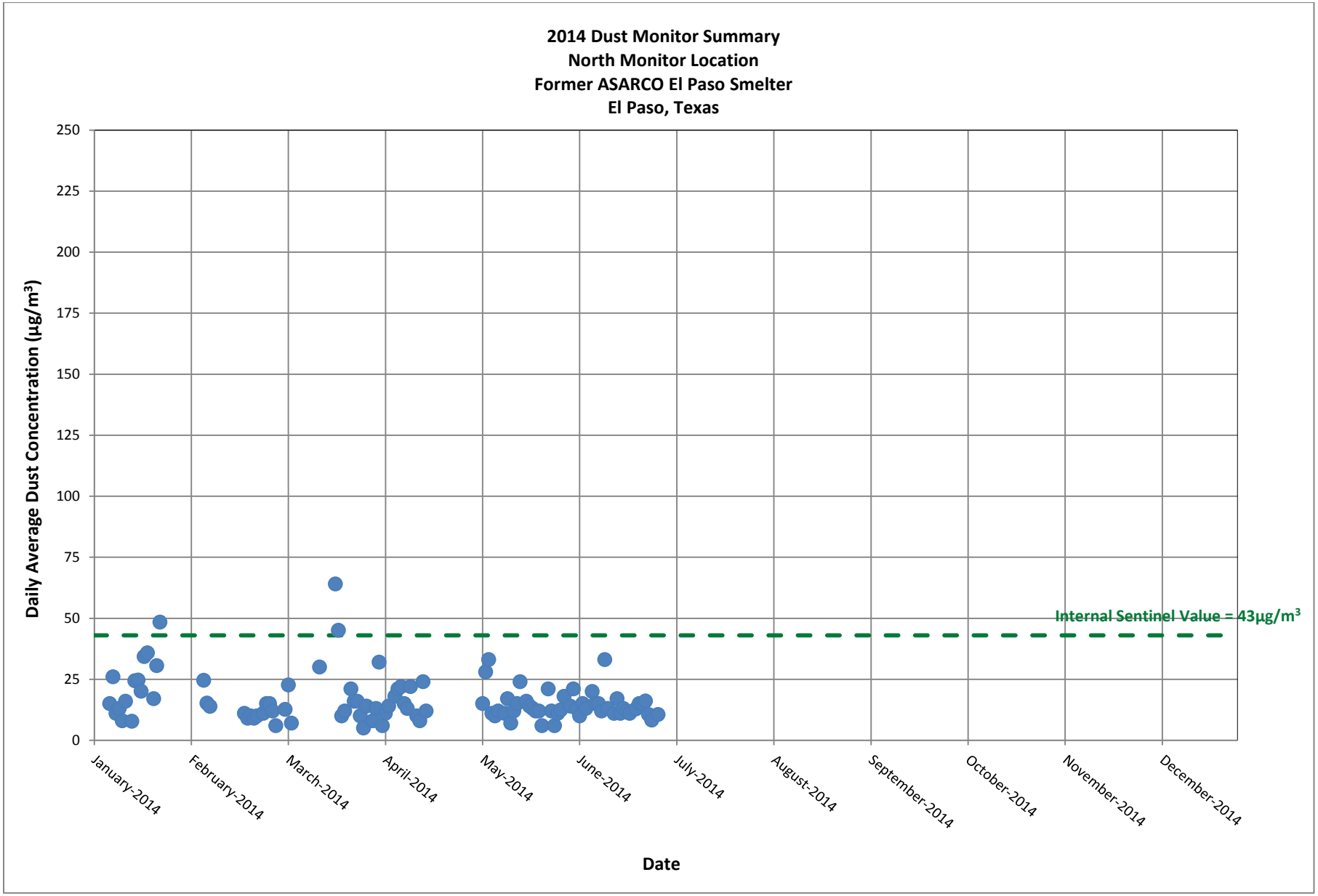
Date	Location	Comments
6/24/2013	Arroyo North	Dust suppression was implemented during working hours to manage onsite dust generation. Rain showers and thunderstorms were present in the evening with winds prevailing from the west southwest at an average speed of 9 mph and wind gusts up to 33 mph. A background 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 $\mu g/m^3$ 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.
1/22/2014	Arroyo North	Dust suppression was implemented during working hours to manage onsite dust generation. Early morning and evening meteorological inversion layer conditions contributed to the high daily average dust concentration exceedance. The average dust concentration during the working hours was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon until after work hours from approximately 5:00 P.M. to midnight when the inversion layer formed again. The elevated dust concentrations for the day are attributed to area-wide meteorological conditions.
1/29/2014	Arroyo North	Dust suppression was implemented during working hours to manage onsite dust generation. The National Weather Service issued a Fire Weather Watch beginning in the evening until the following day. Critical fire weather conditions with increasing were present in the El Paso region in the evening. Wind gusts were recorded up to 13 mph with an average wind speed at 7 mph prevailing from the south southeast. A background dust evaluation was conducted on the elevated data using the upwind (South, EBS E and Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Northwest, Arroyo West, Arroyo North, La Calavera and EBS N (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 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
3/19/2014	Arroyo North	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the northeast with an average wind speed at 5 mph. A background dust evaluation was conducted on the elevated data using the upwind (La Calavera, Arroyo South, Arroyo North and EBS E) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, West, Northwest and EBS S (downwind) locations resulted in the actual average dust generated on site to be 34 $\mu g/m^3$ which is below the site-specific sentinel value of 43 $\mu g/m^3$. The elevated dust concentrations for the day are attributed to meteorological conditions.
4/26/2014	Arroyo North	A wind advisory warning was implemented for the El Paso area for April 25th and 26th. The prevailing wind was from the southwest with a maximum wind gust speed of 55 mph and the average wind speed at 23 mph with widespread dust present beginning in the afternoon and remaining in the area until late evening hours. A background dust evaluation was conducted on the elevated data using the upwind (South and West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West, East and EBS S (downwind) locations resulted in the actual average dust generated on site to be 5 $\mu g/m^3$ 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.

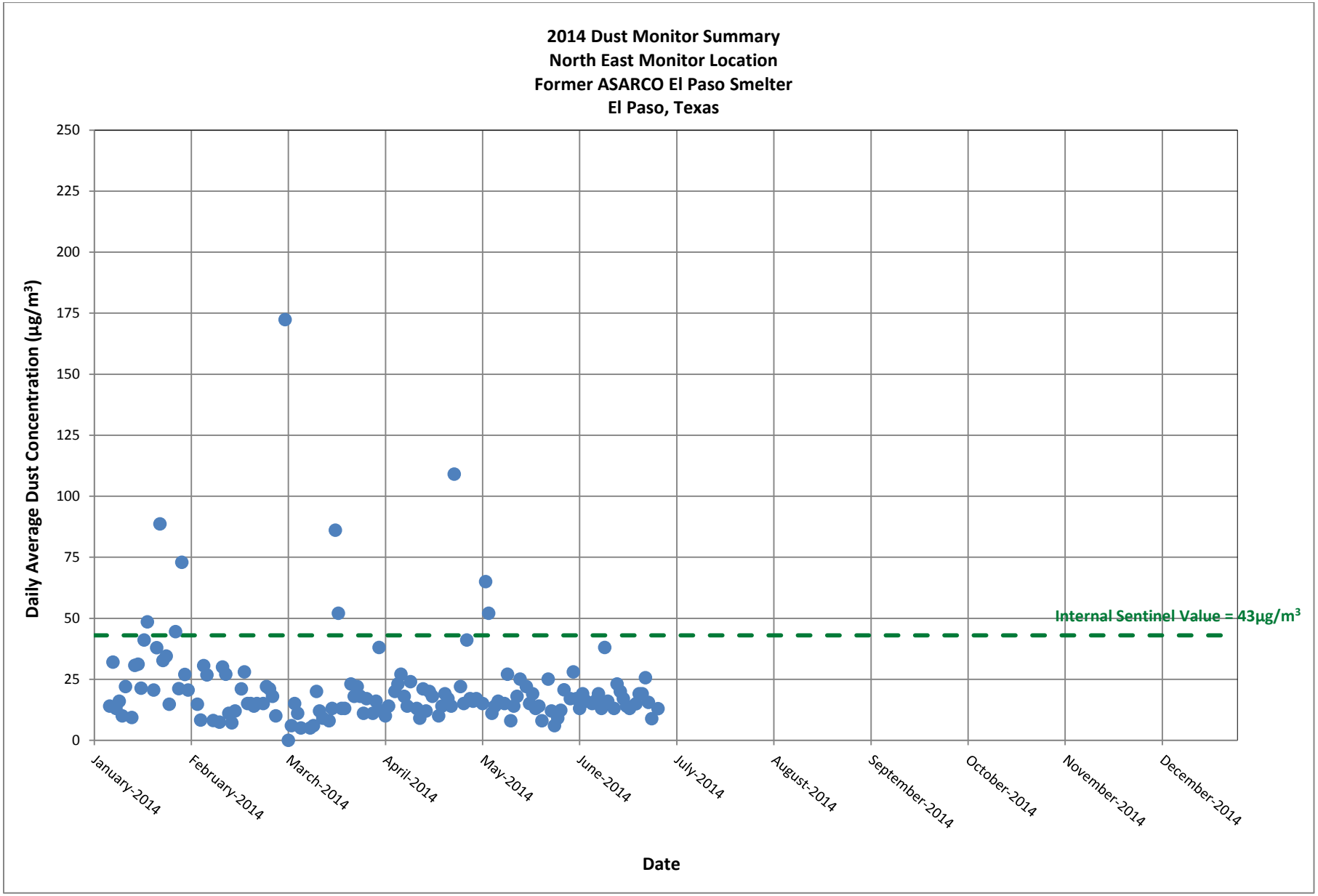
Attachment D

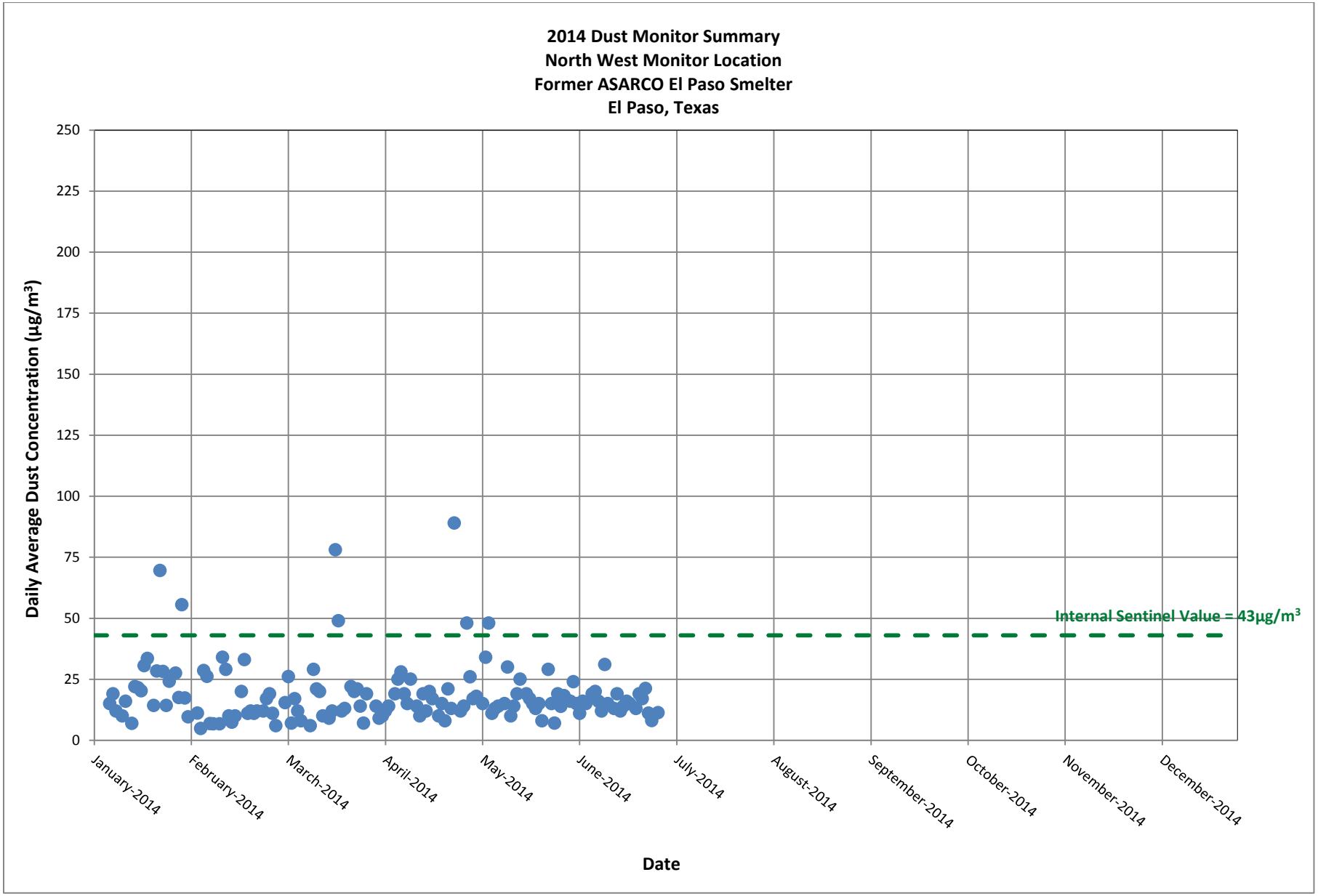
Dust Concentration Graphs

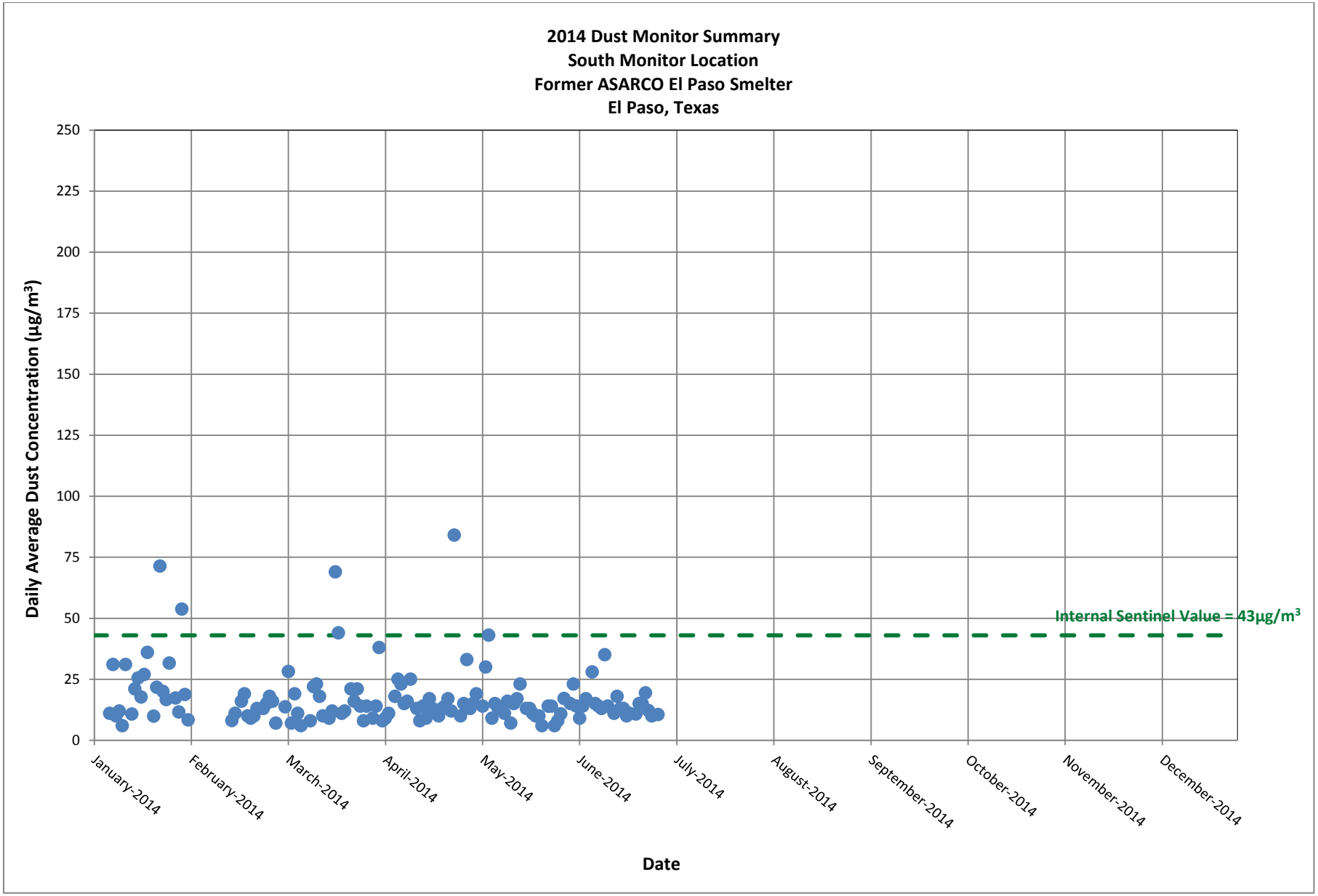

2014 Dust Monitor Summary
Calavera Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
250
225
200
175
150
125
100
75
50
25
0
Internal Sentinel Value = 43µg/m³
January-2014
February-2014
March-2014
April-2014
May-2014
June-2014
July-2014
August-2014
September-2014
October-2014
November-2014
December-2014
Date

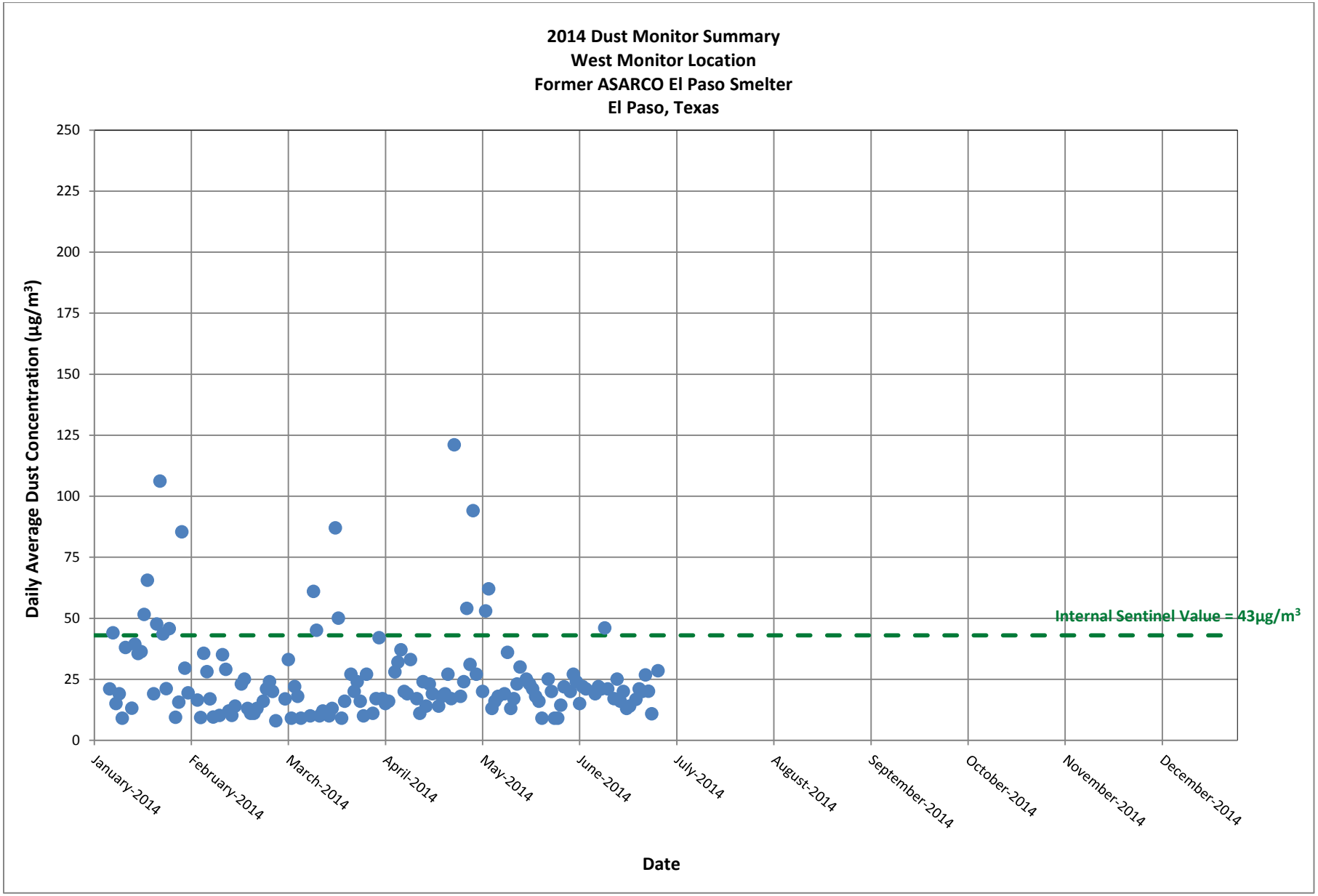

2014 Dust Monitor Summary
East Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
250
225
200
175
150
125
100
75
50
25
0
Internal Sentinel Value = 43µg/m³
January-2014
February-2014
March-2014
April-2014
May-2014
June-2014
July-2014
August-2014
September-2014
October-2014
November-2014
December-2014
Date

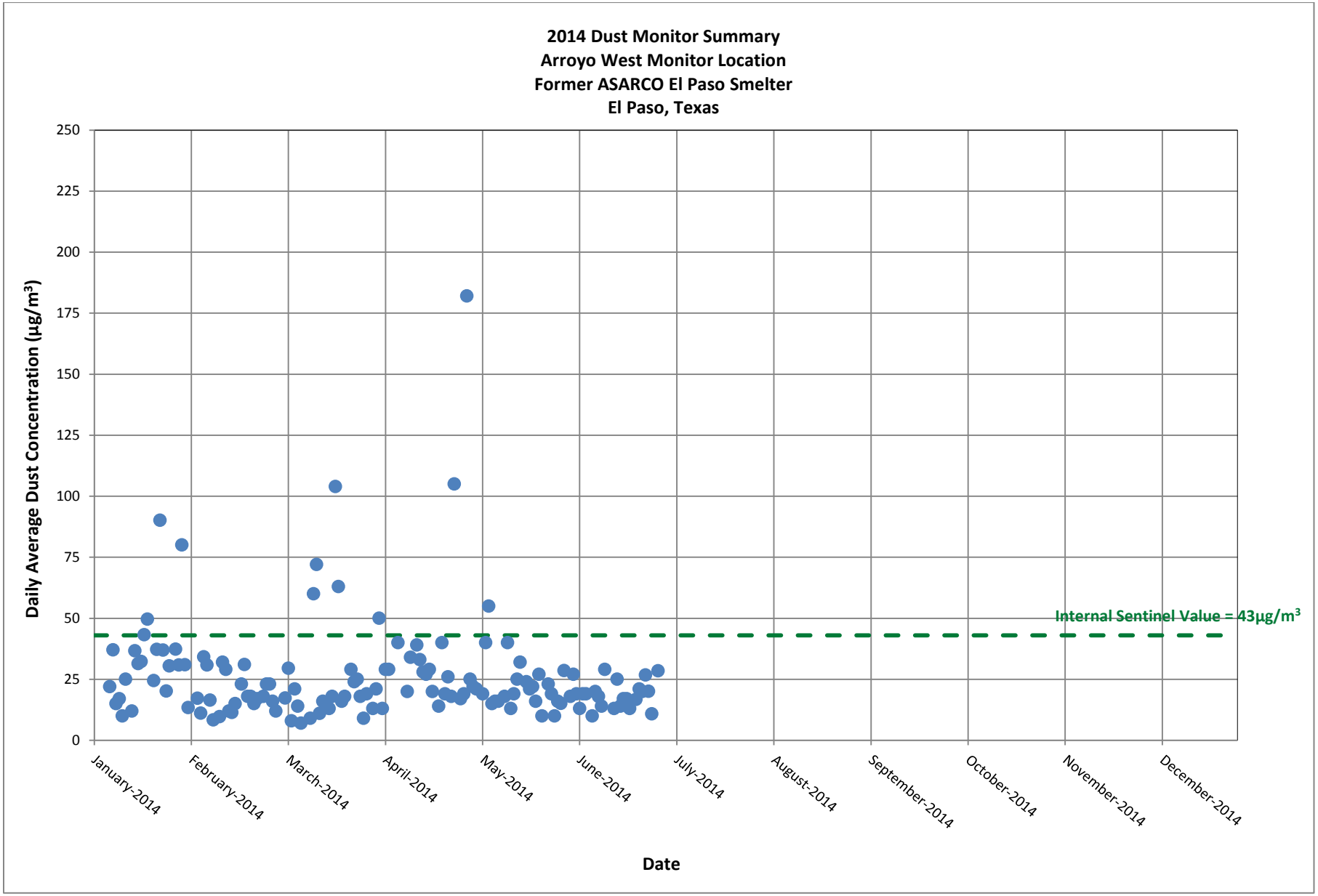

2014 Dust Monitor Summary
North Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
250
225
200
175
150
125
100
75
50
25
0
Internal Sentinel Value = 43µg/m³
January-2014
February-2014
March-2014
April-2014
May-2014
June-2014
July-2014
August-2014
September-2014
October-2014
November-2014
December-2014
Date

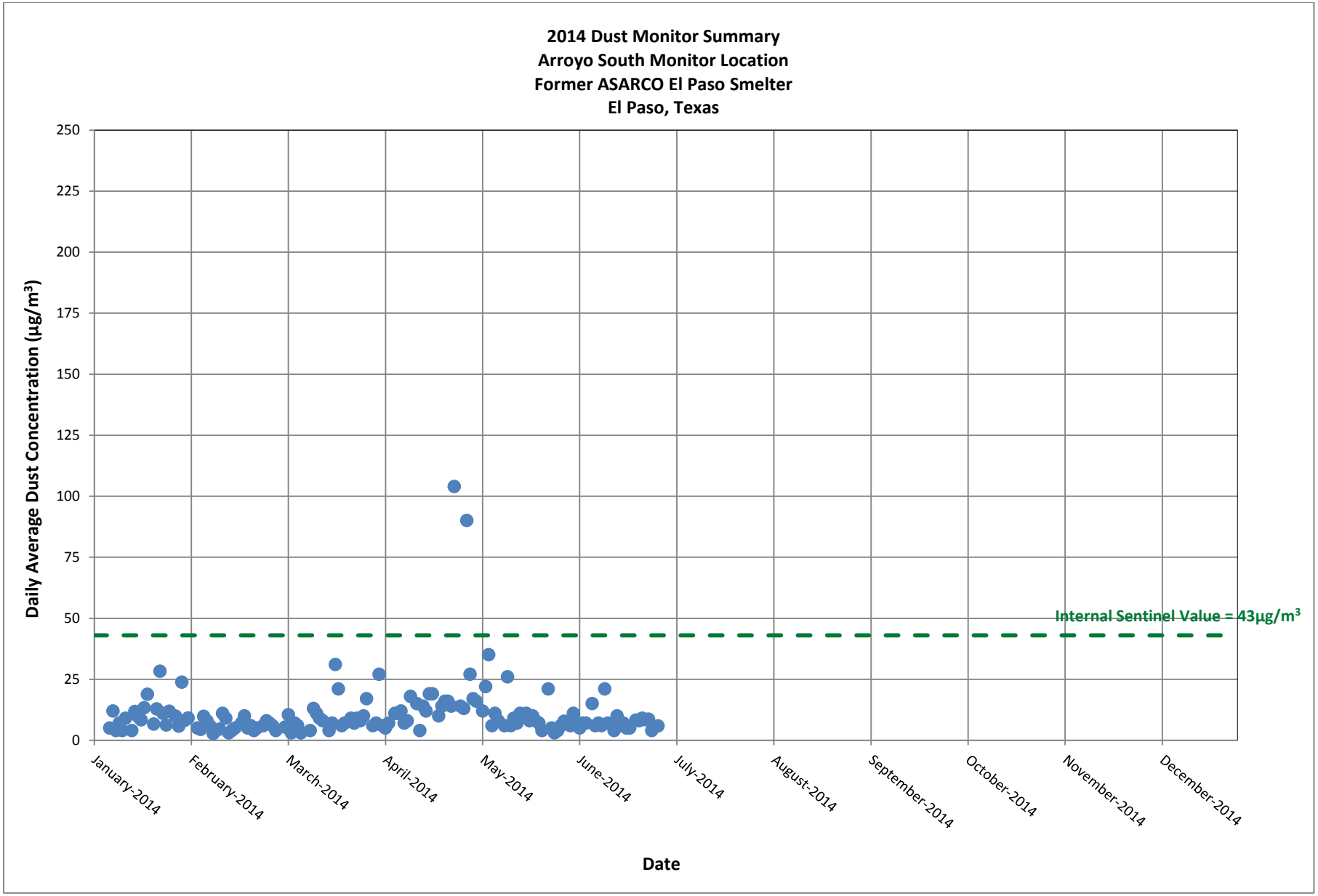

2014 Dust Monitor Summary
North East Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
250
225
200
175
150
125
100
75
50
25
0
Internal Sentinel Value = 43µg/m³
January-2014
February-2014
March-2014
April-2014
May-2014
June-2014
July-2014
August-2014
September-2014
October-2014
November-2014
December-2014
Date

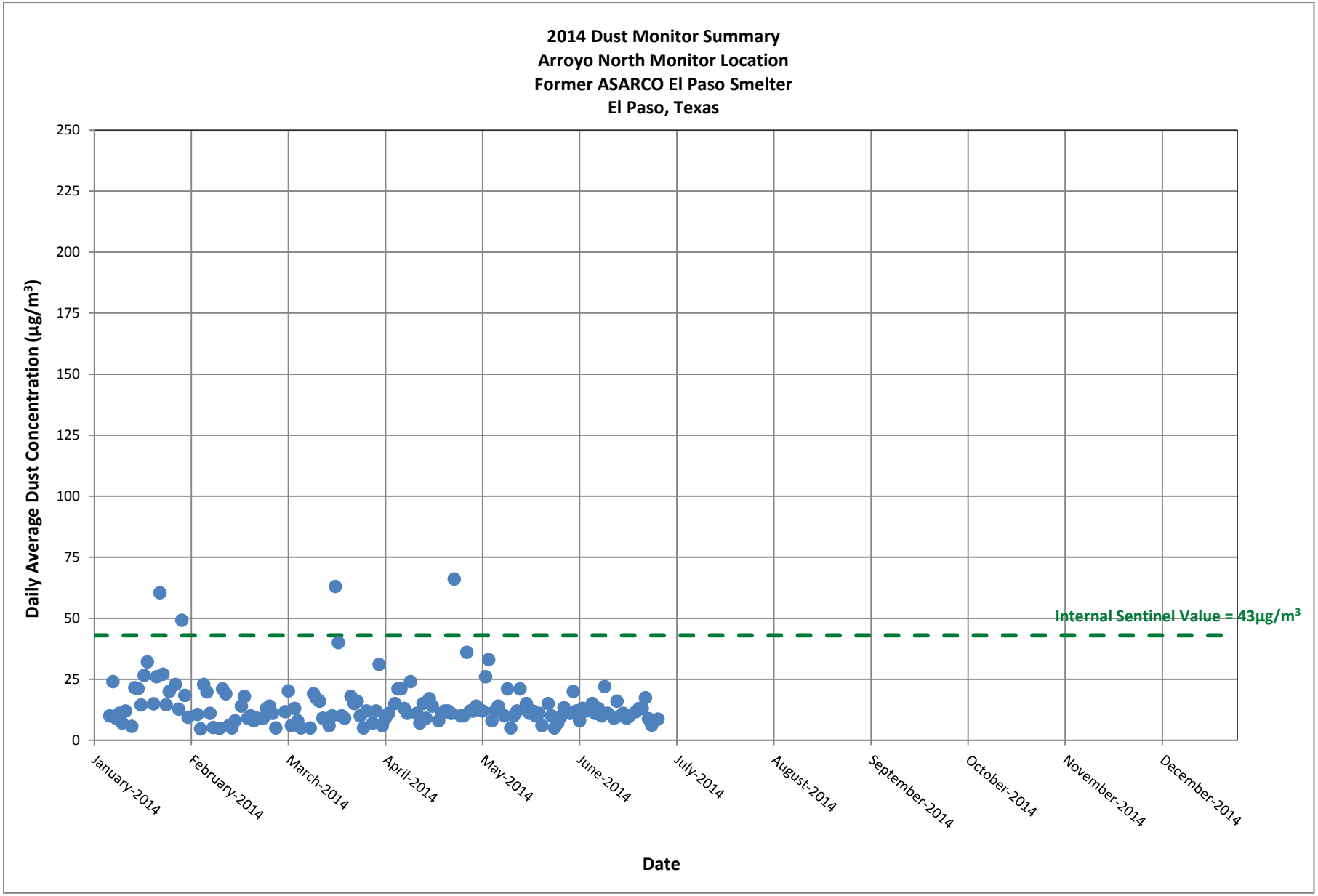

2014 Dust Monitor Summary
North West Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
250
225
200
175
150
125
100
75
50
25
0
Internal Sentinel Value = 43µg/m³
January-2014
February-2014
March-2014
April-2014
May-2014
June-2014
July-2014
August-2014
September-2014
October-2014
November-2014
December-2014
Date


2014 Dust Monitor Summary
South Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
250
225
200
175
150
125
100
75
50
25
0
Internal Sentinel Value = 43µg/m³
January-2014
February-2014
March-2014
April-2014
May-2014
June-2014
July-2014
August-2014
September-2014
October-2014
November-2014
December-2014
Date


2014 Dust Monitor Summary
West Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
250
225
200
175
150
125
100
75
50
25
0
Internal Sentinel Value = 43µg/m³
January-2014
February-2014
March-2014
April-2014
May-2014
June-2014
July-2014
August-2014
September-2014
October-2014
November-2014
December-2014
Date


2014 Dust Monitor Summary
Arroyo West Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
250
225
200
175
150
125
100
75
50
25
0
Internal Sentinel Value = 43µg/m³
January-2014
February-2014
March-2014
April-2014
May-2014
June-2014
July-2014
August-2014
September-2014
October-2014
November-2014
December-2014
Date


2014 Dust Monitor Summary
Arroyo South Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
250
225
200
175
150
125
100
75
50
25
0
Internal Sentinel Value = 43µg/m³
January-2014
February-2014
March-2014
April-2014
May-2014
June-2014
July-2014
August-2014
September-2014
October-2014
November-2014
December-2014
Date


2014 Dust Monitor Summary
Arroyo North Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
250
225
200
175
150
125
100
75
50
25
0
Internal Sentinel Value = 43µg/m³
January-2014
February-2014
March-2014
April-2014
May-2014
June-2014
July-2014
August-2014
September-2014
October-2014
November-2014
December-2014
Date