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February 12, 2015

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

Subject: January 2015 Site-Wide Dust Monitoring Summary

Dear Mr. Puga:

Malcolm Pirnie, Inc. (Malcolm Pirnie) performed dust monitoring activities at the Former ASARCO Smelter site in El Paso, Texas during the month of January 2015. When activities during the month of January with the potential to generate dust were conducted on site, dust data was collected from monitoring locations near the site fence line, around the arroyo and Category I landfill and near La Calavera. Remedial activities for the Fines Pile near the north property perimeter ended the first week of January and the east borrow source remedial activity resumed the second week of January. The three dust monitors (MP-11, MP-12 and MP-13) have been removed from due to reduced remedial activity around the perimeter of 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 are provided in Attachment D.

DUST MONITORING ACTIVITY

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

On January 10th the MP-3 monitor located on the Arroyo North location was reported a reading error. It was cleaned and calibrated by environmental field staff and operational the following day. The MP-3 monitor reported a zero error on January 15th at which time it was replaced by the

North location monitor (MP-6) while the MP-3 monitor was sent to the manufacturer for repair and calibration. Accordingly, as presented in Attachment C, Table 2 readings for the MP-3, MP-6, MP-11, MP-12 and MP-13 are represented by 'ND' for 'not deployed' for the dates the monitors were not functioning properly or decommissioned.

ROUTINE DUST MONITORING DATA RESULTS & SUMMARY

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

Daily average dust concentrations were at or below the site-specific sentinel value of 43 µg/m^3 at all dust monitoring locations during the month of January with the following exceptions:

January 6th – The daily average dust concentration for the South 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 northeast with a maximum wind gust speed of 48 mph and the average wind speed at 6 mph. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo South, Arroyo West and Arroyo North) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location 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. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.

January 7th – The daily average dust concentration for the Arroyo West monitor was greater than the sentinel value.

Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the east with a maximum wind gust speed of 31 mph and the average wind speed at 13 mph. A background dust evaluation was conducted on the elevated data using the upwind (East) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 9 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.

January 9th – The daily average dust concentration for the West monitor was greater than the sentinel value.

Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the east with a maximum wind gust speed of 26 mph and the average

wind speed at 9 mph. A background dust evaluation was conducted on the elevated data using the upwind (East) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 7 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.

January 26th – The daily average dust concentration for the Arroyo West, Northeast, East, South 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 north with a maximum wind gust speed of 15 mph and the average wind speed at 7 mph. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo South and Arroyo West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the South and West (downwind) location 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. Therefore, 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,

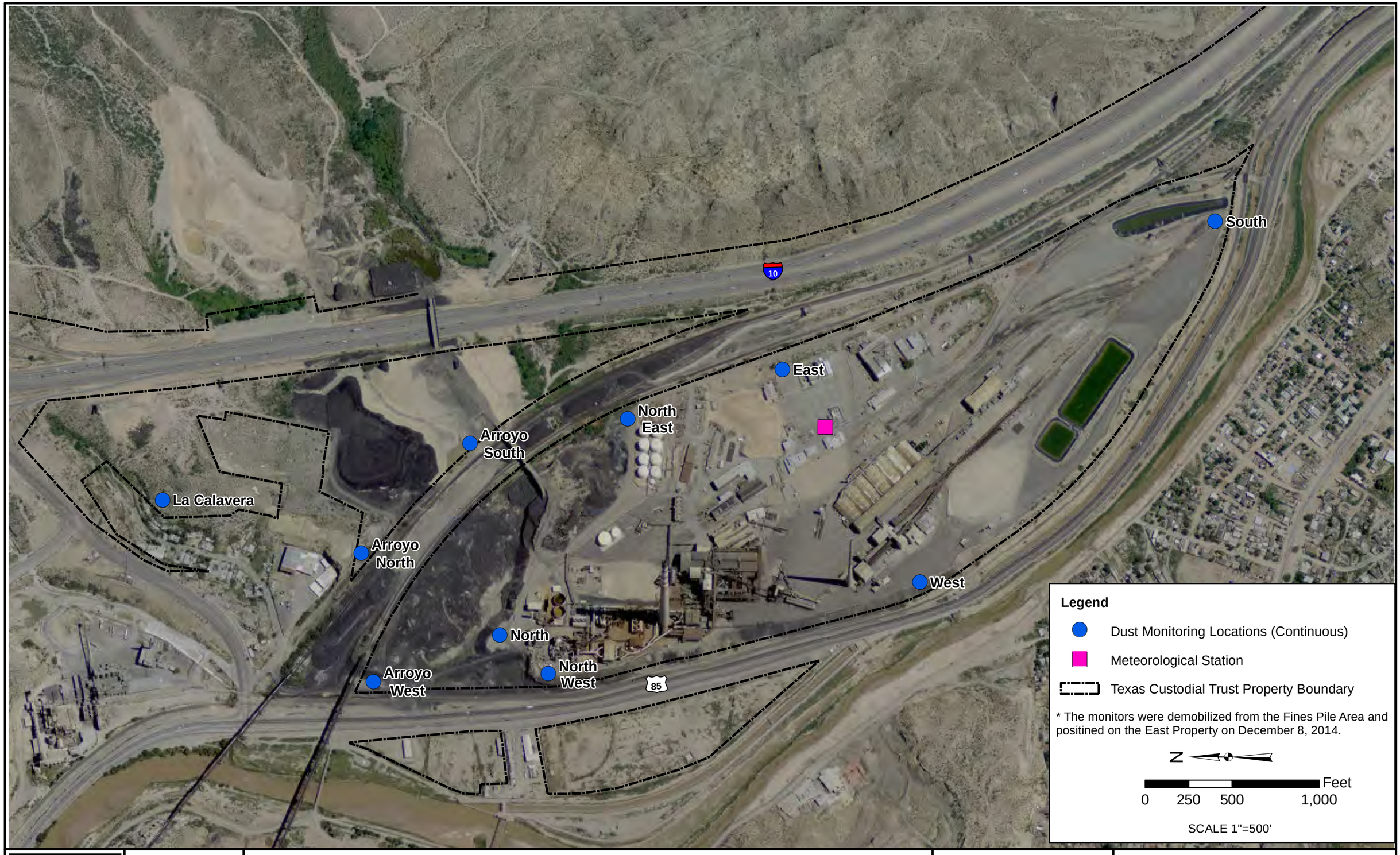
MALCOLM PIRNIE, INC.

Michael R Berry, P.E.
Principal Mechanical Engineer

Project 6835001
Attachments
cc: Former ASARCO Smelter Project Team

Attachment A

Figures



MALCOLM PIRNIE

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Suite 401
El Paso, TX 79901

Texas Custodial Trust
El Paso Smelter Site
Air Monitoring Plan

AIR MONITORING NETWORK

FEBRUARY 2015

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

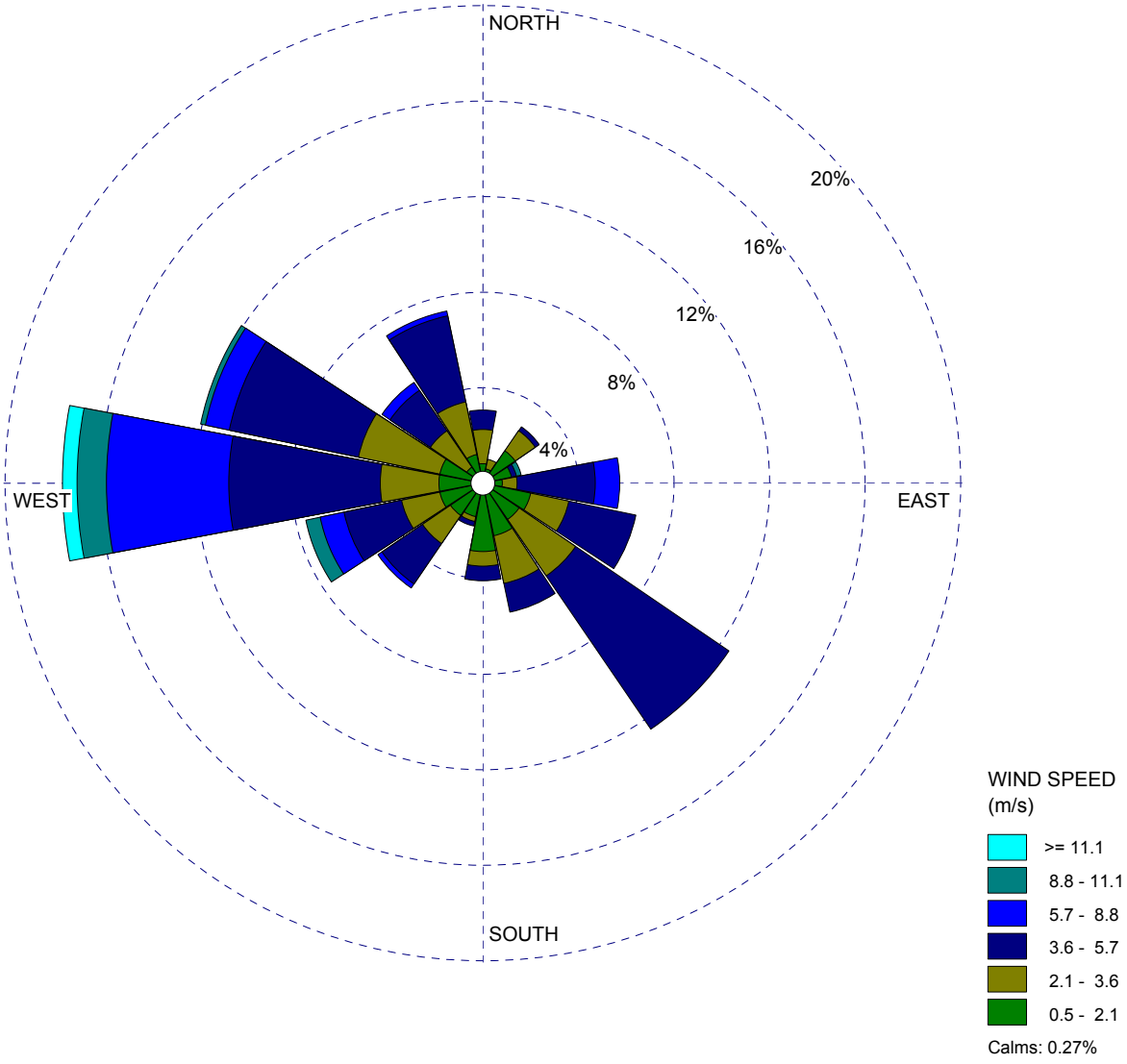
Wind Rose Plots

WIND ROSE PLOT:

Former ASARCO El Paso Smelter
January 2015 Monthly Dust Monitoring Wind Rose Plot

DISPLAY:

Wind Speed
Direction (blowing from)



COMMENTS: NOTE: Wind data was obtained from onsite meteorological station.	DATA PERIOD: **Start Date: 2015-01-01 - 00:00** **End Date: 2015-01-31 - 19:00**	COMPANY NAME: **ARCADIS US INC (Dba Malcolm Pirnie)**	
		MODELER: **Karina Kenigsberg**	
	CALM WINDS: **0.27%**	TOTAL COUNT: **490 hrs.**	
	AVG. WIND SPEED: **3.71 m/s**	DATE: **2015-02-10**	PROJECT NO.: **06835001.2015**

Attachment C

Tables

TABLE 1

January Elevated Dust Monitor Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

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

Date	Location	Maximum Average Reading (µg/m^3)	Comments	Action
2015-01-06	South, West	54	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 48 mph and the average wind speed at 6 mph. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo South, Arroyo West and Arroyo North) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location 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. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.	Dust suppression was implemented during working hours to manage onsite dust generation.
2015-01-07	Arroyo West	45	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the east with a maximum wind gust speed of 31 mph and the average wind speed at 13 mph. A background dust evaluation was conducted on the elevated data using the upwind (East) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 9 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.	Dust suppression was implemented during working hours to manage onsite dust generation.
2015-01-09	West	45	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the east with a maximum wind gust speed of 26 mph and the average wind speed at 9 mph. A background dust evaluation was conducted on the elevated data using the upwind (East) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 7 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.	Dust suppression was implemented during working hours to manage onsite dust generation.
2015-01-26	Arroyo West, Northeast, East, South, West	63	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the north with a maximum wind gust speed of 15 mph and the average wind speed at 7 mph. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo South and Arroyo West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the South and West (downwind) location 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. Therefore, 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

January Daily Average Dust Monitoring Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Week ending January 10th						
Date	Monday, January 05, 2015	Tuesday, January 06, 2015	Wednesday, January 07, 2015	Thursday, January 08, 2015	Friday, January 09, 2015	Saturday, January 10, 2015
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		41	45	40	38	30
Arroyo South		17	11	13	12	10
Arroyo North		25	35	36	41	ND
La Calavera		28	26	15	22	24
Northeast		42	30	39	36	30
North		25	18	27	22	17
Northwest		38	28	36	33	28
East		41	31	38	38	31
South		44	28	36	32	24
West		54	39	43	45	34
Fines Pile SE		ND	ND	ND	ND	ND
Fines Pile NW		ND	ND	ND	ND	ND
Fines Pile NE		ND	ND	ND	ND	ND
Week ending January 17th						
Date	Monday, January 12, 2015	Tuesday, January 13, 2015	Wednesday, January 14, 2015	Thursday, January 15, 2015	Friday, January 16, 2015	Saturday, January 17, 2015
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	39	24	18	49	36	37
Arroyo South	12	7	7	18	11	14
Arroyo North	79	50	12	33	25	27
La Calavera	21	2	6	19	16	27
Northeast	37	23	18	48	34	38
North	24	14	10	ND	ND	ND
Northwest	36	22	16	46	32	34
East	37	23	12	72	32	39
South	27	16	16	49	27	34
West	42	25	21	71	36	54
East Borrow Source (EBS) North	ND	ND	ND	ND	ND	ND
Fines Pile NW	ND	ND	ND	ND	ND	ND
EBS South	ND	ND	ND	ND	ND	ND
Week ending January 24th						
Date	Monday, January 19, 2015	Tuesday, January 20, 2015	Wednesday, January 21, 2015	Thursday, January 22, 2015	Friday, January 23, 2015	Saturday, January 24, 2015
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	25	49	15	10	17	38
Arroyo South	6	18	5	4	8	16
Arroyo North	15	35	9	7	12	29
La Calavera	11	36	11	10	11	30
Northeast	19	48	13	9	19	46
North	ND	ND	ND	ND	ND	ND
Northwest	22	42	12	9	16	32
East	25	50	13	10	20	52
South	21	46	11	8	19	46
West	36	51	53	11	25	50
EBS	ND	ND	ND	ND	ND	ND
Fines Pile NW	ND	ND	ND	ND	ND	ND
EBS South	ND	ND	ND	ND	ND	ND
Week ending January 31st						
Date	Monday, January 26, 2015	Tuesday, January 27, 2015	Wednesday, January 28, 2015	Thursday, January 29, 2015	Friday, January 30, 2015	Saturday, January 31, 2015
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	49	32	22	24	6	12
Arroyo South	17	12	8	7	3	5
Arroyo North	35	25	15	18	5	9
La Calavera	35	24	14	15	6	8
Northeast	47	33	23	16	6	17
North	ND	ND	ND	ND	ND	ND
Northwest	43	29	19	13	6	13
East	50	35	22	17	7	16
South	47	29	18	13	5	16
West	63	38	27	14	6	21
EBS	ND	ND	ND	ND	ND	ND
Fines Pile NW	ND	ND	ND	ND	ND	ND
EBS South	ND	ND	ND	ND	ND	ND

NOTES:

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

Dust Monitor Summary
South Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
2014-12-10	South	A high wind advisory was issued for the El Paso regional area. 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 11 mph and the average wind speed at 3 mph. A background dust evaluation was conducted on the elevated data using the upwind (EBS South, Northeast, East and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 11 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2015-01-06	South	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 48 mph and the average wind speed at 6 mph. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo South, Arroyo West and Arroyo North) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location 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. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2015-01-26	South	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the north with a maximum wind gust speed of 15 mph and the average wind speed at 7 mph. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo South and Arroyo West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the South and West (downwind) location 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. Therefore, 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
2014-12-02	West	The prevailing wind was from the southeast with a maximum wind gust speed of 13 mph and the average wind speed at 4 mph. A background dust evaluation was conducted on the elevated data using the upwind (South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 9 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-04	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 24 mph and the average wind speed at 6 mph. A background dust evaluation was conducted on the elevated data using the upwind (South and Arroyo West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the Northeast and East (downwind) location resulted in the actual average dust generated on site to be 9 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-10	West	A high wind advisory was issued for the El Paso regional area. 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 11 mph and the average wind speed at 3 mph. A background dust evaluation was conducted on the elevated data using the upwind (EBS South, Northeast, East and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 11 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-11	West	The prevailing wind was from the northeast with a maximum wind gust speed of 10 mph and the average wind speed at 3 mph. A background dust evaluation was conducted on the elevated data using the upwind (EBS South, Northeast, East and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 12 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-12	West	The prevailing wind was from the southeast with a maximum wind gust speed of 15 mph and the average wind speed at 4 mph. A background dust evaluation was conducted on the elevated data using the upwind (South, East and Northeast) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West and Arroyo West (downwind) location 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. Therefore, 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
2015-01-06	West	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 48 mph and the average wind speed at 6 mph. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo South, Arroyo West and Arroyo North) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location 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. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2015-01-09	West	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the east with a maximum wind gust speed of 26 mph and the average wind speed at 9 mph. A background dust evaluation was conducted on the elevated data using the upwind (East) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 7 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2015-01-26	West	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the north with a maximum wind gust speed of 15 mph and the average wind speed at 7 mph. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo South and Arroyo West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the South and West (downwind) location 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. Therefore, 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
2014-12-04	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 24 mph and the average wind speed at 6 mph. A background dust evaluation was conducted on the elevated data using the upwind (South and Arroyo West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the Northeast and East (downwind) location resulted in the actual average dust generated on site to be 9 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-10	North West	A high wind advisory was issued for the El Paso regional area. 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 11 mph and the average wind speed at 3 mph. A background dust evaluation was conducted on the elevated data using the upwind (EBS South, Northeast, East and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 11 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-11	North West	The prevailing wind was from the northeast with a maximum wind gust speed of 10 mph and the average wind speed at 3 mph. A background dust evaluation was conducted on the elevated data using the upwind (EBS South, Northeast, East and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 12 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, 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
2014-03-19	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 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.
2014-03-20	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 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. The elevated dust concentrations for the day are attributed to meteorological conditions.

Dust Monitor Summary
North East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
2014-12-04	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 24 mph and the average wind speed at 6 mph. A background dust evaluation was conducted on the elevated data using the upwind (South and Arroyo West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the Northeast and East (downwind) location resulted in the actual average dust generated on site to be 9 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-10	North East	A high wind advisory was issued for the El Paso regional area. 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 11 mph and the average wind speed at 3 mph. A background dust evaluation was conducted on the elevated data using the upwind (EBS South, Northeast, East and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 11 µg/m3 which is below the site-specific sentinel value of 43 µg/m3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-11	North East	The prevailing wind was from the northeast with a maximum wind gust speed of 10 mph and the average wind speed at 3 mph. A background dust evaluation was conducted on the elevated data using the upwind (EBS South, Northeast, East and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 12 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-12	North East	The prevailing wind was from the southeast with a maximum wind gust speed of 15 mph and the average wind speed at 4 mph. A background dust evaluation was conducted on the elevated data using the upwind (South, East and Northeast) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West and Arroyo West (downwind) location 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. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-20	North East	The prevailing wind was from the northwest with a maximum wind gust speed of 22 mph and the average wind speed at 5 mph. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo West, West, Northwest, and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the East (downwind) location resulted in the actual average dust generated on site to be 13 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2015-01-26	North East	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the north with a maximum wind gust speed of 15 mph and the average wind speed at 7 mph. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo South and Arroyo West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the South and West (downwind) location 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. Therefore, 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
2014-12-03	East	The prevailing wind was from the south with a maximum wind gust speed of 15 mph and the average wind speed at 5 mph. A background dust evaluation was conducted on the elevated data using the upwind (South, Fines Pile SE, Arroyo South) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the Arroyo West, La Calavera, Arroyo North, Fines Pile NE (downwind) location resulted in the actual average dust generated on site to be 10 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-04	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 24 mph and the average wind speed at 6 mph. A background dust evaluation was conducted on the elevated data using the upwind (South and Arroyo West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the Northeast and East (downwind) location resulted in the actual average dust generated on site to be 9 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-11	East	The prevailing wind was from the northeast with a maximum wind gust speed of 10 mph and the average wind speed at 3 mph. A background dust evaluation was conducted on the elevated data using the upwind (EBS South, Northeast, East and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 12 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-12	East	The prevailing wind was from the southeast with a maximum wind gust speed of 15 mph and the average wind speed at 4 mph. A background dust evaluation was conducted on the elevated data using the upwind (South, East and Northeast) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West and Arroyo West (downwind) location 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. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-20	East	The prevailing wind was from the northwest with a maximum wind gust speed of 22 mph and the average wind speed at 5 mph. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo West, West, Northwest, and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the East (downwind) location resulted in the actual average dust generated on site to be 13 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2015-01-26	East	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the north with a maximum wind gust speed of 15 mph and the average wind speed at 7 mph. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo South and Arroyo West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the South and West (downwind) location 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. Therefore, 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
2014-12-10	Calavera	A high wind advisory was issued for the El Paso regional area. 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 11 mph and the average wind speed at 3 mph. A background dust evaluation was conducted on the elevated data using the upwind (EBS South, Northeast, East and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 11 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-11	Calavera	The prevailing wind was from the northeast with a maximum wind gust speed of 10 mph and the average wind speed at 3 mph. A background dust evaluation was conducted on the elevated data using the upwind (EBS South, Northeast, East and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 12 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, 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
2014-12-04	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 24 mph and the average wind speed at 6 mph. A background dust evaluation was conducted on the elevated data using the upwind (South and Arroyo West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the Northeast and East (downwind) location resulted in the actual average dust generated on site to be 9 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-10	Arroyo West	A high wind advisory was issued for the El Paso regional area. 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 11 mph and the average wind speed at 3 mph. A background dust evaluation was conducted on the elevated data using the upwind (EBS South, Northeast, East and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 11 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-11	Arroyo West	The prevailing wind was from the northeast with a maximum wind gust speed of 10 mph and the average wind speed at 3 mph. A background dust evaluation was conducted on the elevated data using the upwind (EBS South, Northeast, East and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 12 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-12	Arroyo West	The prevailing wind was from the southeast with a maximum wind gust speed of 15 mph and the average wind speed at 4 mph. A background dust evaluation was conducted on the elevated data using the upwind (South, East and Northeast) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West and Arroyo West (downwind) location 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. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2015-01-07	Arroyo West	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the east with a maximum wind gust speed of 31 mph and the average wind speed at 13 mph. A background dust evaluation was conducted on the elevated data using the upwind (East) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 9 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, 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
2015-01-26	Arroyo West	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the north with a maximum wind gust speed of 15 mph and the average wind speed at 7 mph. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo South and Arroyo West) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the South and West (downwind) location 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. Therefore, 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
2014-04-26	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 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.

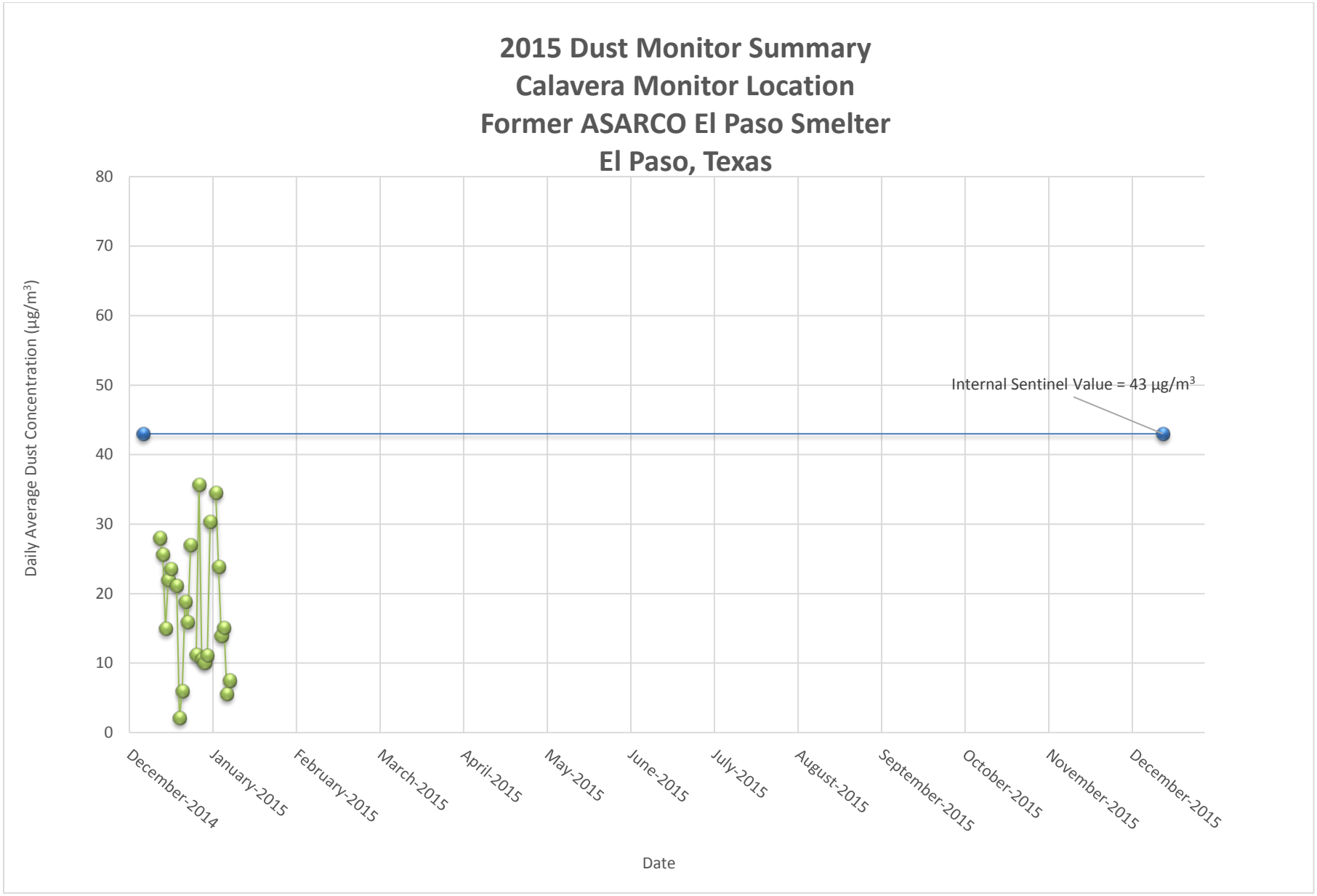
Dust Monitor Summary
Arroyo North Elevated Data Summary

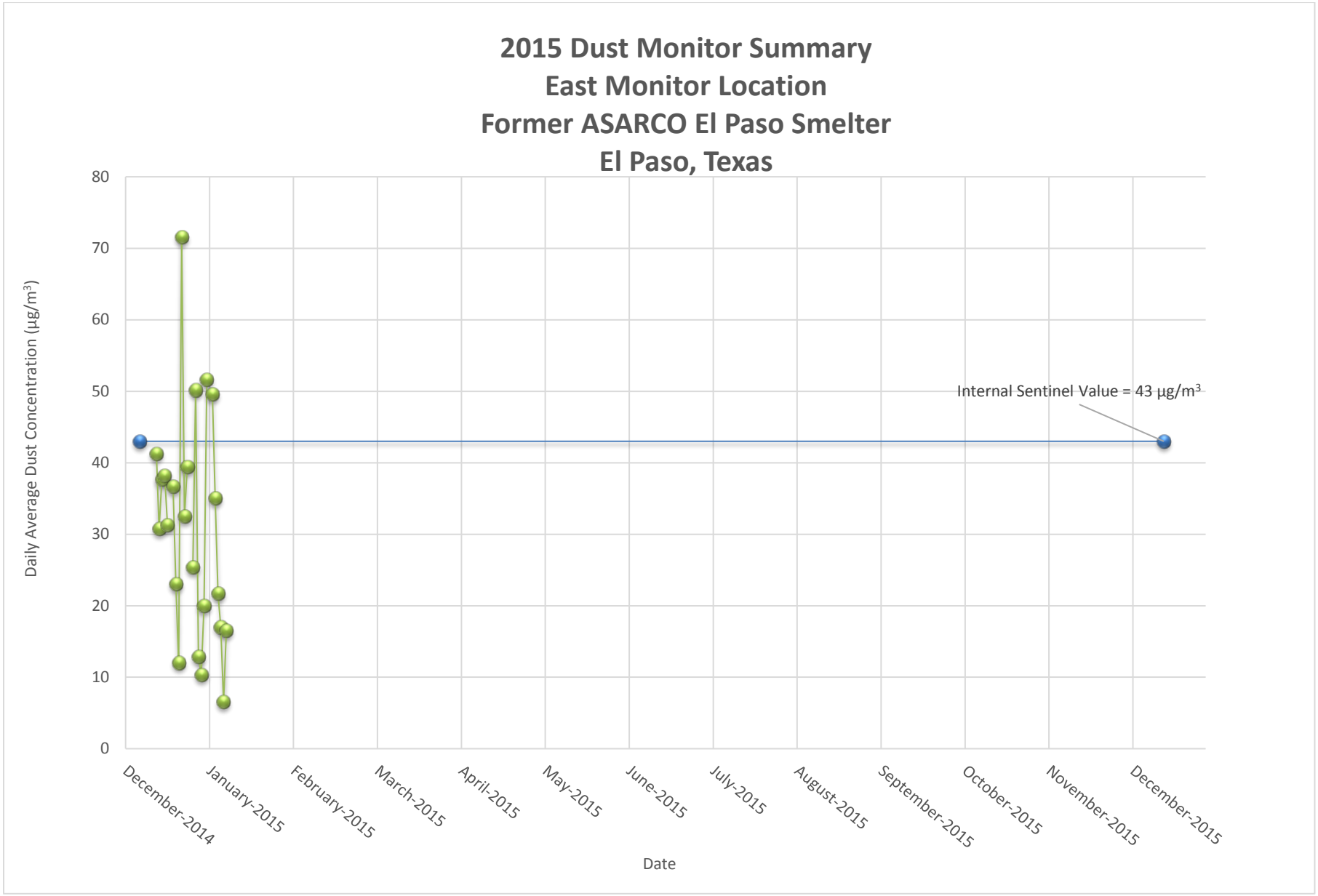
Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

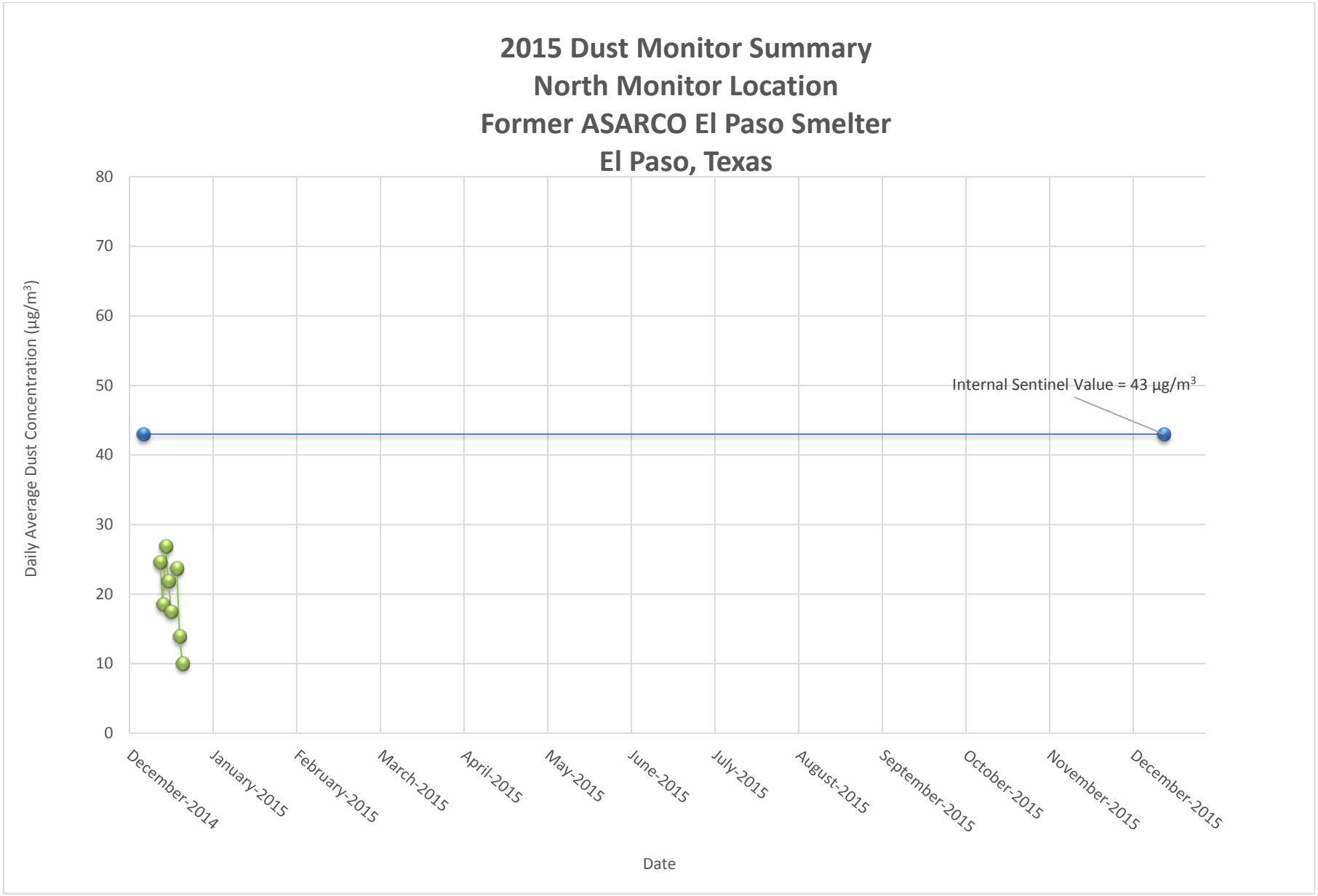
Date	Location	Comments
2014-12-06	Arroyo North	Dust suppression was implemented during working hours to manage onsite dust generation. The prevailing wind was from the northeast with a maximum wind gust speed of 26 mph and the average wind speed at 9 mph. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo South and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West and Arroyo West (downwind) location resulted in the actual average dust generated on site to be 11 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.
2014-12-11	Arroyo North	The prevailing wind was from the northeast with a maximum wind gust speed of 10 mph and the average wind speed at 3 mph. A background dust evaluation was conducted on the elevated data using the upwind (EBS South, Northeast, East and La Calavera) locations. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration at the West (downwind) location resulted in the actual average dust generated on site to be 12 µg/m^3 which is below the site-specific sentinel value of 43 µg/m^3. Therefore, the elevated dust concentrations for the day are attributed to meteorological conditions.

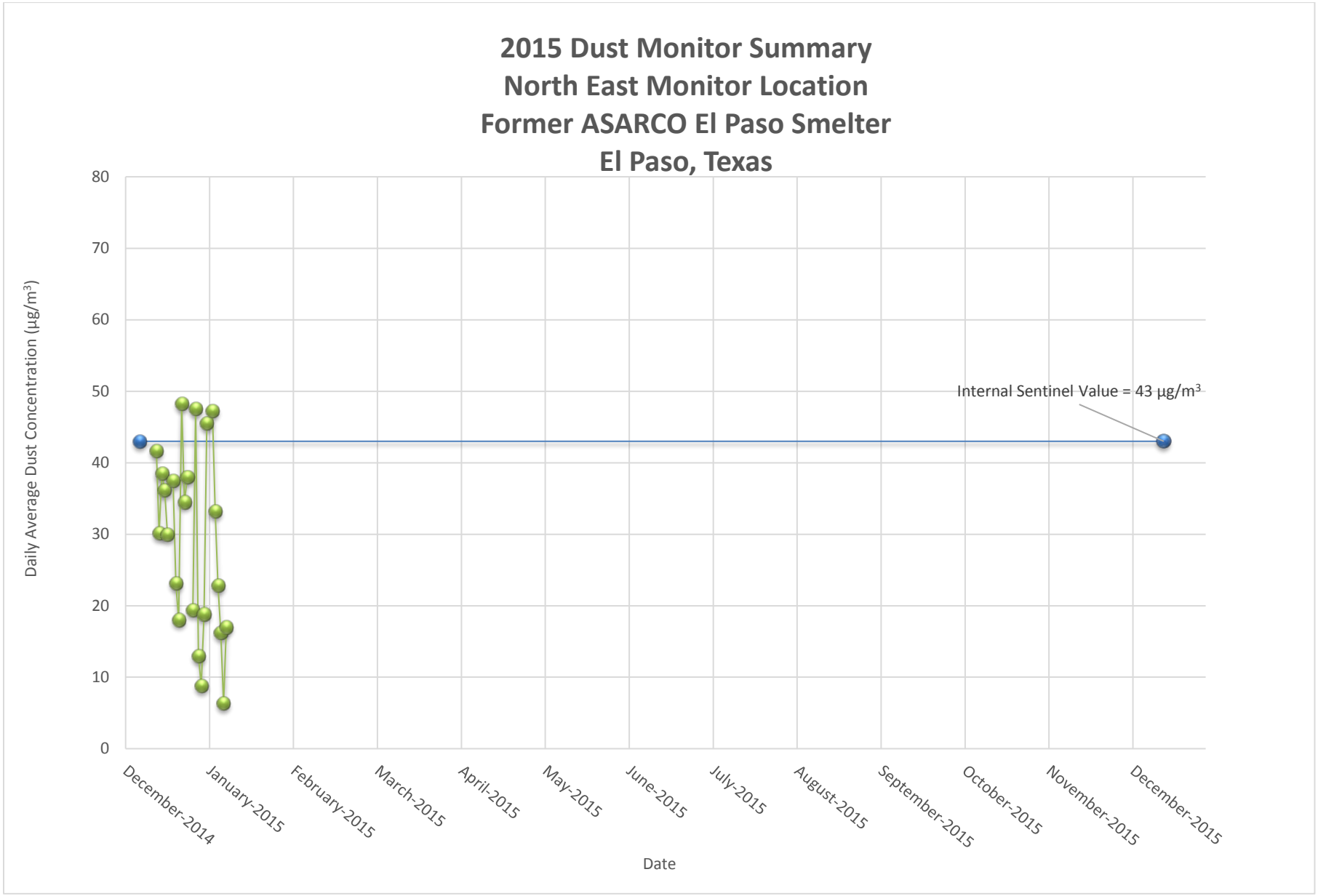
Attachment D

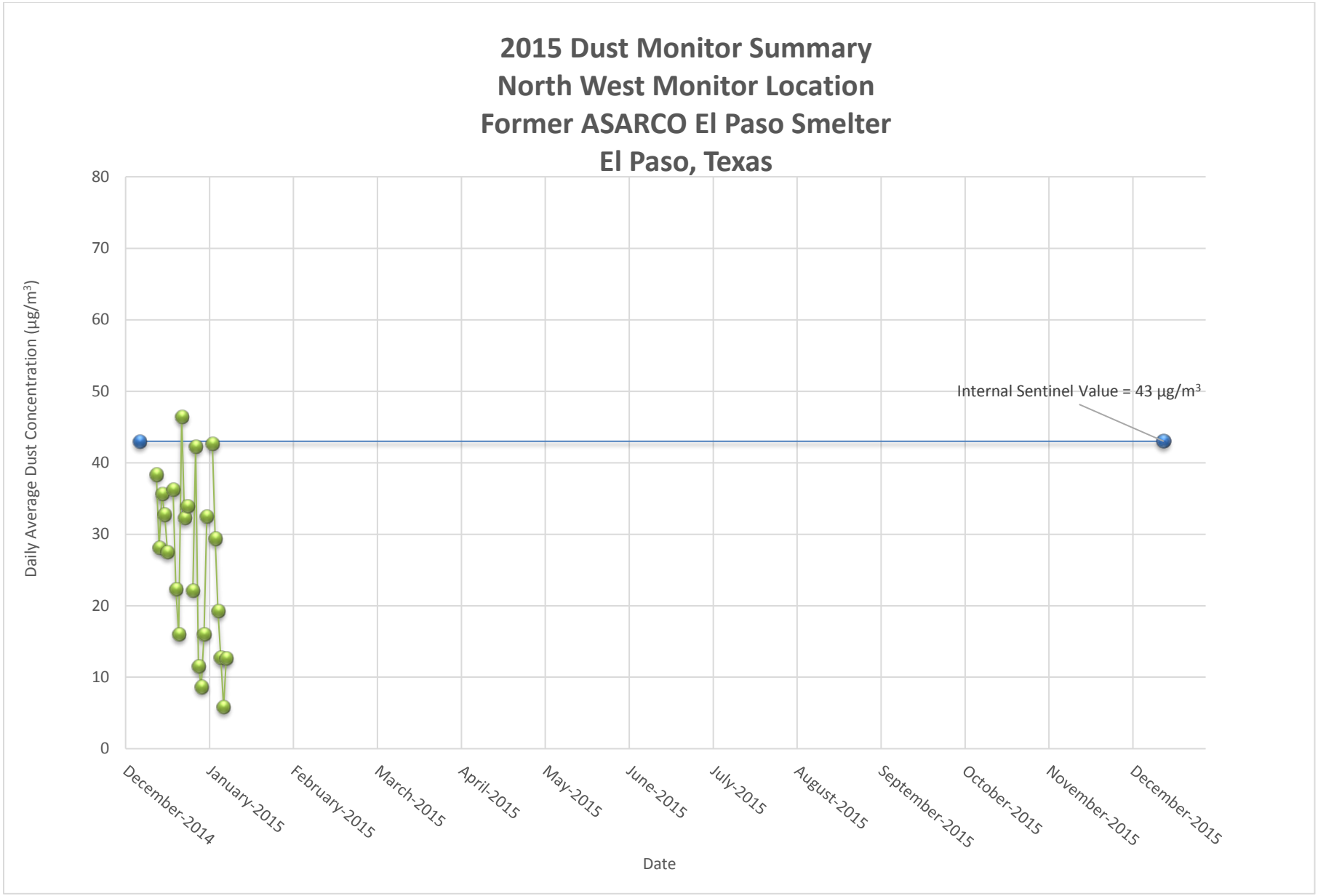
Dust Concentration Graphs

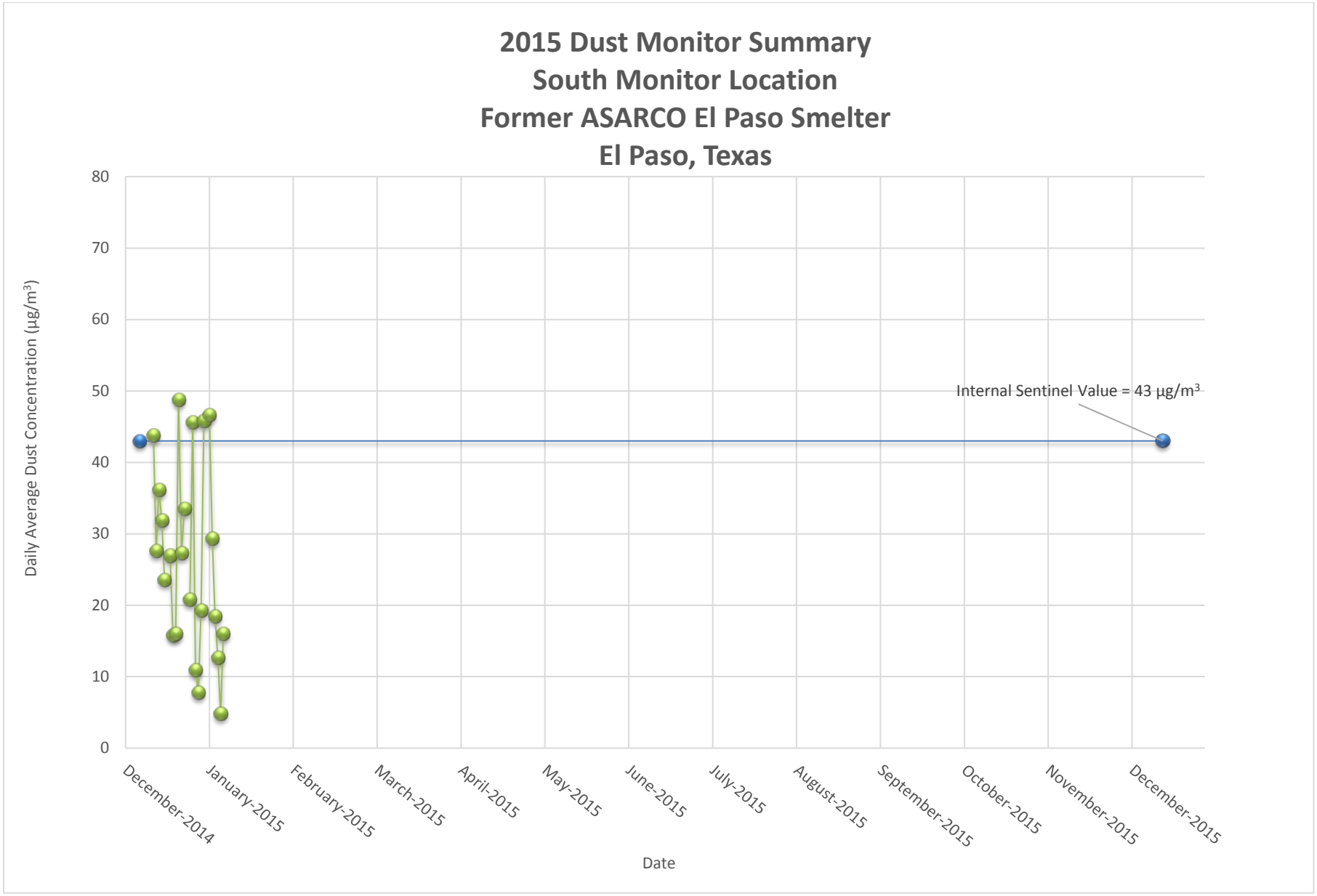

2015 Dust Monitor Summary
Calavera Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
80
70
60
50
40
30
20
10
0
Internal Sentinel Value = 43 µg/m³
December-2014
January-2015
February-2015
March-2015
April-2015
May-2015
June-2015
July-2015
August-2015
September-2015
October-2015
November-2015
December-2015
Date

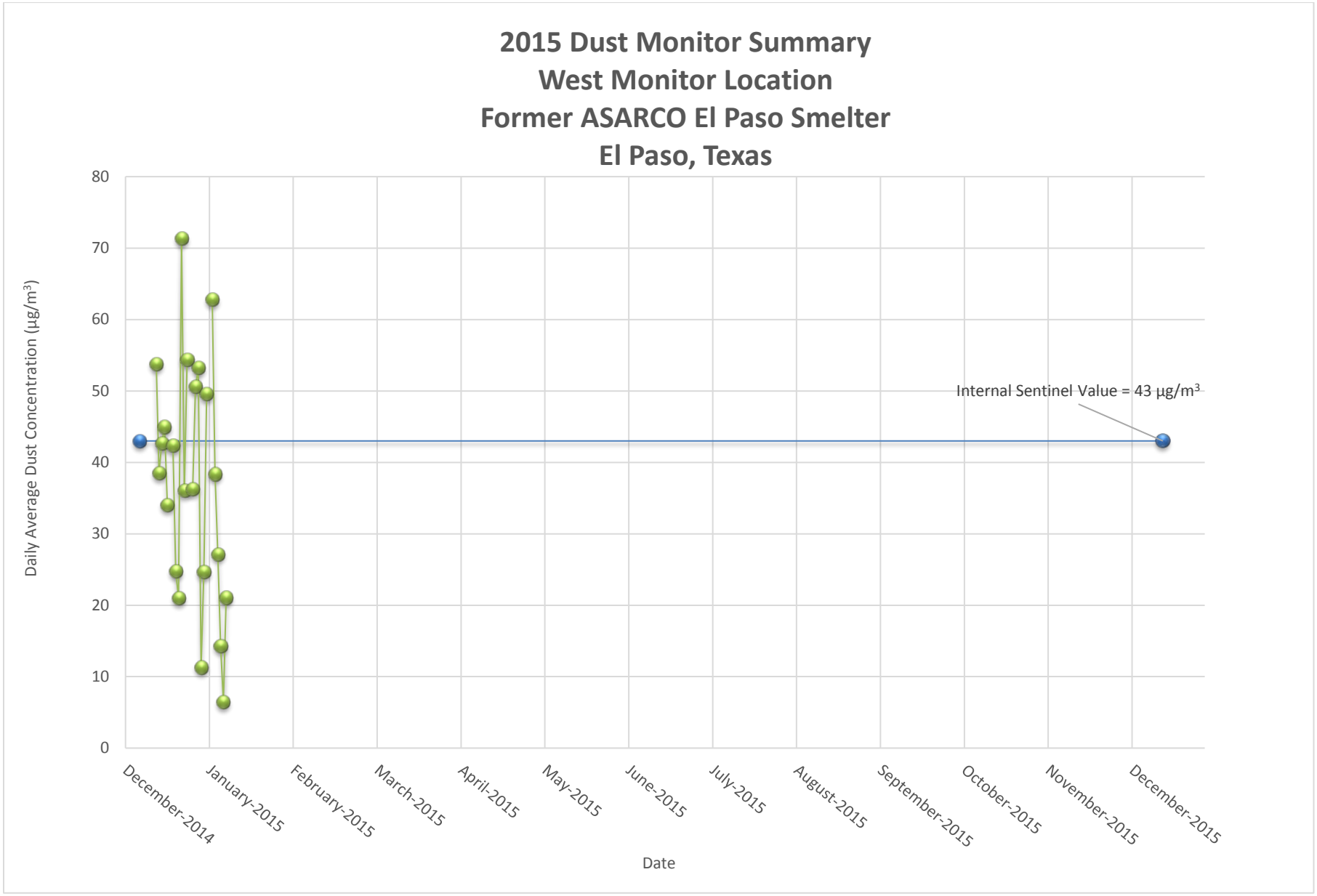

2015 Dust Monitor Summary
East Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
80
70
60
50
40
30
20
10
0
Internal Sentinel Value = 43 µg/m³
December-2014
January-2015
February-2015
March-2015
April-2015
May-2015
June-2015
July-2015
August-2015
September-2015
October-2015
November-2015
December-2015
Date

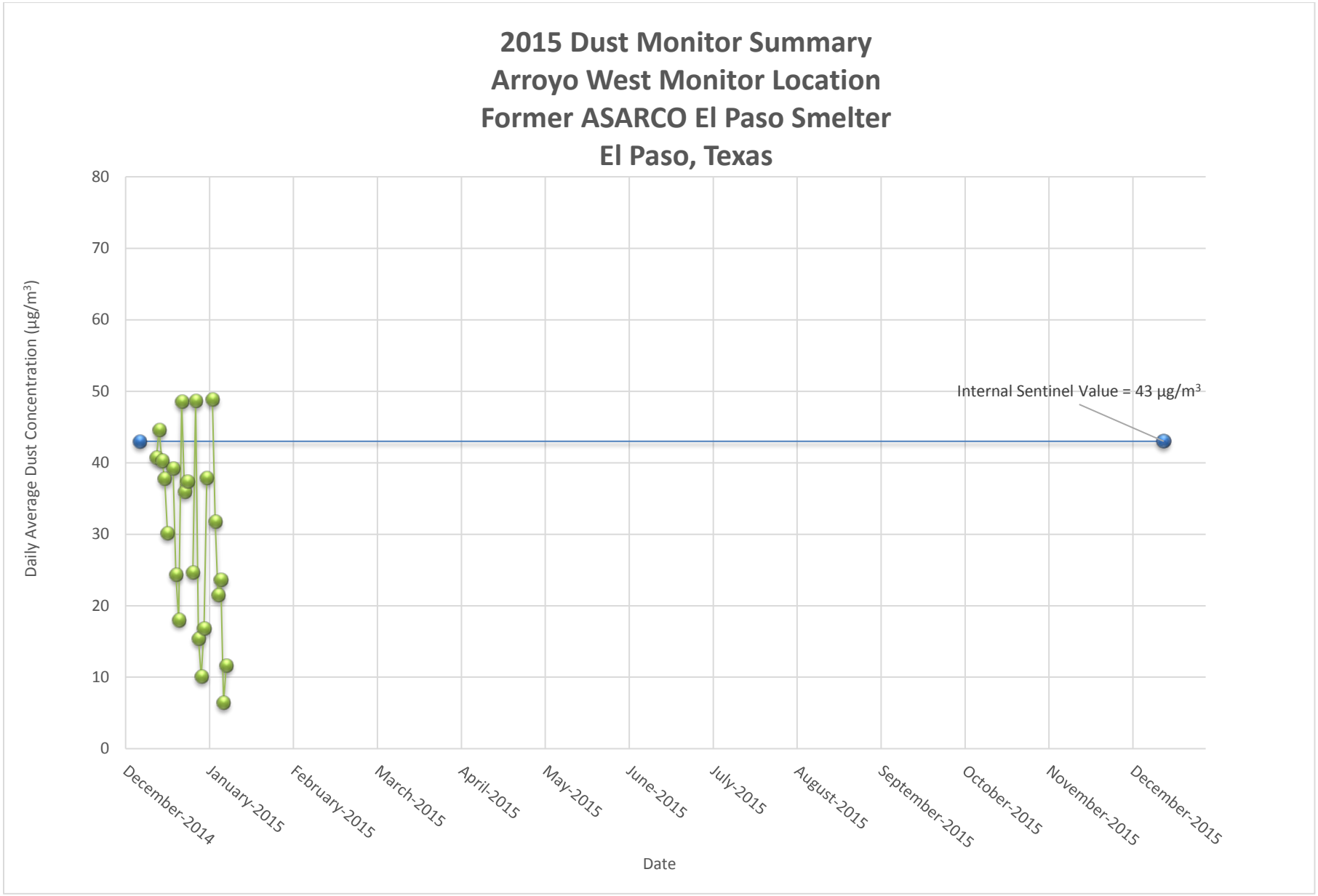

2015 Dust Monitor Summary
North Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
80
70
60
50
40
30
20
10
0
Internal Sentinel Value = 43 µg/m³
December-2014
January-2015
February-2015
March-2015
April-2015
May-2015
June-2015
July-2015
August-2015
September-2015
October-2015
November-2015
December-2015
Date

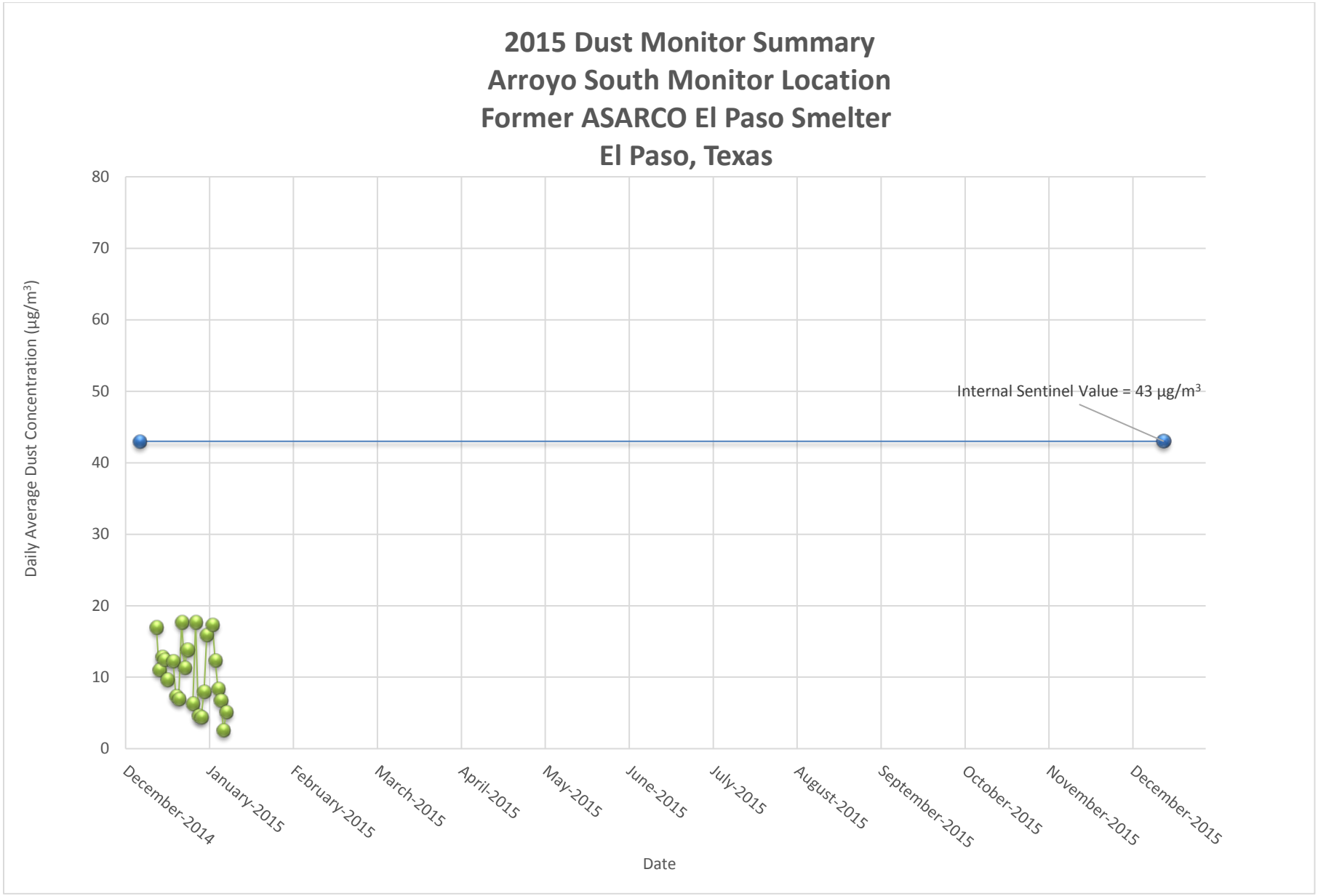

2015 Dust Monitor Summary
North East Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
80
70
60
50
40
30
20
10
0
Internal Sentinel Value = 43 µg/m³
December-2014
January-2015
February-2015
March-2015
April-2015
May-2015
June-2015
July-2015
August-2015
September-2015
October-2015
November-2015
December-2015
Date

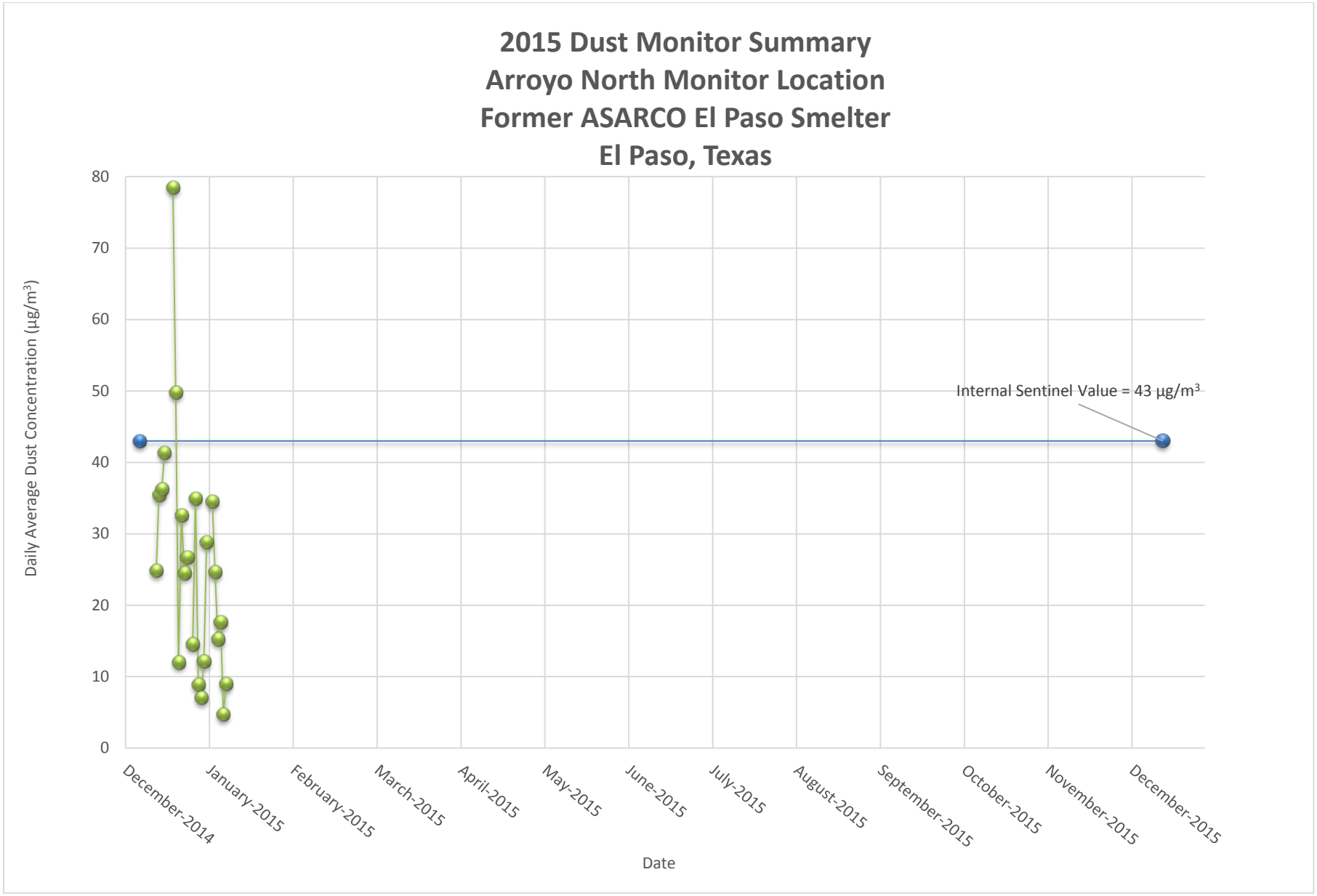

2015 Dust Monitor Summary
North West Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
80
70
60
50
40
30
20
10
0
Internal Sentinel Value = 43 µg/m³
December-2014
January-2015
February-2015
March-2015
April-2015
May-2015
June-2015
July-2015
August-2015
September-2015
October-2015
November-2015
December-2015
Date


2015 Dust Monitor Summary
South Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
80
70
60
50
40
30
20
10
0
Internal Sentinel Value = 43 µg/m³
December-2014
January-2015
February-2015
March-2015
April-2015
May-2015
June-2015
July-2015
August-2015
September-2015
October-2015
November-2015
December-2015
Date


2015 Dust Monitor Summary
West Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
80
70
60
50
40
30
20
10
0
Internal Sentinel Value = 43 µg/m³
December-2014
January-2015
February-2015
March-2015
April-2015
May-2015
June-2015
July-2015
August-2015
September-2015
October-2015
November-2015
December-2015
Date


2015 Dust Monitor Summary
Arroyo West Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
80
70
60
50
40
30
20
10
0
Internal Sentinel Value = 43 µg/m³
December-2014
January-2015
February-2015
March-2015
April-2015
May-2015
June-2015
July-2015
August-2015
September-2015
October-2015
November-2015
December-2015
Date


2015 Dust Monitor Summary
Arroyo South Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
80
70
60
50
40
30
20
10
0
Internal Sentinel Value = 43 µg/m³
December-2014
January-2015
February-2015
March-2015
April-2015
May-2015
June-2015
July-2015
August-2015
September-2015
October-2015
November-2015
December-2015
Date


2015 Dust Monitor Summary
Arroyo North Monitor Location
Former ASARCO El Paso Smelter
El Paso, Texas
Daily Average Dust Concentration (µg/m³)
80
70
60
50
40
30
20
10
0
Internal Sentinel Value = 43 µg/m³
December-2014
January-2015
February-2015
March-2015
April-2015
May-2015
June-2015
July-2015
August-2015
September-2015
October-2015
November-2015
December-2015
Date