

January 2: , 2013

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

Subject: December 2012 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 December 2012. When activities with the potential to generate dust were conducted on site, dust data was collected from monitoring locations near the site fence line, around the arroyo, and near La Calavera. No dust monitoring was conducted on the east property during the month of December since no work was performed in that area during the month.

The following attachments are included with this letter:

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

Dust monitor locations are shown in Attachment A, Figure 1. An onsite meteorological station was used to assess wind speed and direction. A Wind Rose Plot summarizing the wind data for the month is provided in Attachment B. Dust Concentration graphs for the calendar year are provided in Attachment D.

#### **DUST MONITORING ACTIVITY**

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

The MP-6 monitor which is positioned in the North location (Attachment A, Figure 1) began transmitting a flow error on November 8<sup>th</sup> and was sent to the manufacturer, TSI, for repairs the following day. It returned to its location and was properly functioning on December 12<sup>th</sup>. Accordingly, as presented in Attachment C, Table 2, readings for MP-6 (North) are represented by 'ND' for 'not deployed' for the dates the monitor was not functioning properly.





## DUST MONITORING DATA RESULTS & SUMMARY

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

Daily average dust concentrations were at or below the site-specific sentinel value of  $43 \mu\text{g}/\text{m}^3$  for all dust monitoring locations during the month of December with the exception of the following:

December 5<sup>th</sup> – The daily average dust concentration for the South, Arroyo West and Arroyo South monitors was greater than the sentinel value.

Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty percent of the instantaneous exceedances occurred before or after working hours. While only the above listed monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were present at all monitors. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

December 11<sup>th</sup> – The daily average dust concentration for the South, Arroyo West, Arroyo South and Arroyo North monitors was greater than the sentinel value.

Ninety-five percent of instantaneous exceedances occurred in the evening, after working hours. Dust suppression was implemented as necessary during working hours. An evening inversion layer settled in at night and trapped widespread and offsite particulate matter. The elevated dust concentrations for the day are attributed to meteorological conditions.

December 12<sup>th</sup> – The daily average dust concentration for all monitors except the North and West monitors was greater than the sentinel value.

An inversion layer settled into the El Paso region in the evening on December 11<sup>th</sup>, dissipated by noon on December 12<sup>th</sup>, and then settled back in the area by early evening. Widespread and offsite particulate matter was trapped by this inversion, which resulted in instantaneous dust exceedances with the highest readings occurring from 4:00PM to 11:00PM. Dust suppression





was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

December 13<sup>th</sup> – The daily average dust concentration for the South, East, Arroyo West, Arroyo South and Arroyo North monitors was greater than the sentinel value.

Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. All instantaneous exceedances occurred before or after working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

December 18<sup>th</sup> – The daily average dust concentration for the South, North, Arroyo West and Arroyo South monitors was greater than the sentinel value.

A cold front entered the El Paso area creating an inversion layer in the evening after working hours. Instantaneous dust concentration exceedances began after 5:00PM and continued throughout the evening. While only the above listed monitors show daily average dust concentrations greater than the sentinel value all monitors had instantaneous exceedances throughout the evening. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

December 19<sup>th</sup> – The daily average dust concentration for all monitors except the La Calavera monitor was greater than the sentinel value.

Wind gusts up to 62 mph were present in the El Paso area with an average wind speed of 21 mph prevailing from the west. Due to the high winds widespread dust was present in the area from 8:00AM to 4:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.

December 20<sup>th</sup> – The daily average dust concentration for the South, East, North West, Arroyo West, Arroyo South and Arroyo North monitors was greater than the sentinel value.

An early morning inversion layer settled in the El Paso area before and after working hours which trapped offsite and widespread particulate matter. The inversion layer dispersed by 11:00AM and settled in again after 6:00PM. The highest instantaneous dust concentration exceedances occurred between 7:00PM and 10:30PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.





Mr. Roberto Puga, P.G.  
Texas Custodial Trust  
January 2: , 2013

Page 4 of 4

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Very truly yours,

MALCOLM PIRNIE, INC.

A handwritten signature in cursive script that reads "Alicia Fogg".

Alicia Fogg, PE  
Project Engineer  
Project 6835001

Attachments

cc: Former ASARCO Smelter Project Team





**Attachment A**

Figure•



Map Document: (S:\GIS\_Resources\Standards\_Guidelines\MapTemplates\GIS\_TEMPLATES\_2005\11x17\_Landscape.mxd)  
7/19/2005 - 5:27:24 PM



**Legend**

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

N

0 500 1,000  
Feet

SCALE 1"=500'

**MALCOLM  
PIRNIC**

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

Texas Custodial Trust  
El Paso Smelter Site  
Air Monitoring Plan

**EXISTING AIR MONITORING NETWORK**

SEPTEMBER 2012

FIGURE 1





**Attachment B**

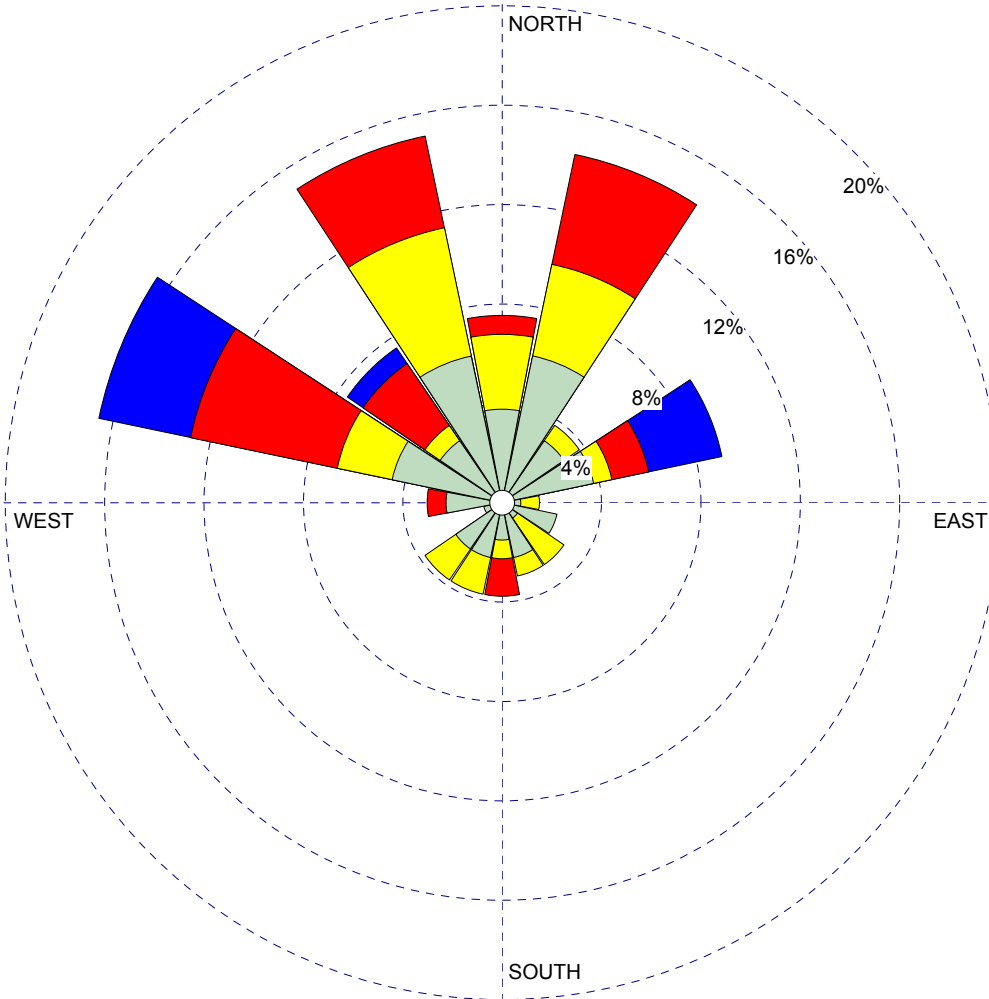
Wind Rose Plots

WIND ROSE PLOT:

**Former ASARCO El Paso Smelter Remediation Site  
December 2012 Wind Rose Plot**

DISPLAY:

**Wind Speed  
Direction (blowing from)**



WIND SPEED  
(m/s)

- >= 11.1
- 8.8 - 11.1
- 5.7 - 8.8
- 3.6 - 5.7
- 2.1 - 3.6
- 0.5 - 2.1

Calms: 0.27%

COMMENTS:

DATA PERIOD:

**Start Date: 12/1/2012 - 00:00  
End Date: 12/12/2012 - 05:00**

COMPANY NAME:

**Malcolm Pirnie, Inc**

MODELER:

**Karina E Correa**

CALM WINDS:

**0.27%**

TOTAL COUNT:

**133 hrs.**

AVG. WIND SPEED:

**2.82 m/s**

DATE:

**1/2/2013**

PROJECT NO.:

**06835001.2012**







**Attachment C**

Tables

TABLE 1

## December 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  $\mu\text{g}/\text{m}^3$ .**

| Date       | Location  | Maximum Value<br>( $\mu\text{g}/\text{m}^3$ ) | Comments   | Action                            |
|------------|---|---|--|-----------------------------------|
| 12/5/2012  | South, Arroyo West and Arroyo South                     | 49  | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty percent of the instantaneous exceedances occurred before or after working hours. While only the above listed monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were present at all monitors. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions. | No field modifications necessary. |
| 12/11/2012 | South, Arroyo West, Arroyo South and Arroyo North       | 52  | Ninety-five percent of instantaneous exceedances occurred in the evening, after working hours. Dust suppression was implemented as necessary during working hours. An evening inversion layer settled in at night and trapped widespread and offsite particulate matter. The elevated dust concentrations for the day are attributed to meteorological conditions.   | No field modifications necessary. |
| 12/12/2012 | North and West  | 157   | An inversion layer settled into the El Paso region in the evening on December 11th, dissipated by noon on December 12th, and then settled back in the area by early evening. Widespread and offsite particulate matter was trapped by this inversion, which resulted in instantaneous dust exceedances with the highest readings occurring from 4:00PM to 11:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.   | No field modifications necessary. |
| 12/13/2012 | South, East, Arroyo West, Arroyo South and Arroyo North | 55  | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. All instantaneous exceedances occurred before or after working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.  | No field modifications necessary. |
| 12/18/2012 | South, North, Arroyo West and Arroyo South              | 57  | A cold front entered the El Paso area creating an inversion layer in the evening after working hours. Instantaneous dust concentration exceedances began after 5:00PM and continued throughout the evening. While only the above listed monitors show daily average dust concentrations greater than the sentinel value all monitors had instantaneous exceedances throughout the evening. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.   | No field modifications necessary. |

TABLE 1

December 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<sup>3</sup>.*

| Date       | Location  | Maximum Value<br>(µg/m <sup>3</sup> ) | Comments   | Action                            |
|------------|---|---------------------------------------|--|-----------------------------------|
| 12/19/2012 | All monitors except La Calavera                                     | 97                                    | Wind gusts up to 62 mph were present in the El Paso area with an average wind speed of 21 mph prevailing from the west. Due to the high winds widespread dust was present in the area from 8:00AM to 4:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.   | No field modifications necessary. |
| 12/20/2012 | South, East, North West, Arroyo West, Arroyo South and Arroyo North | 61                                    | An early morning inversion layer settled in the El Paso area before and after working hours which trapped offsite and widespread particulate matter. The inversion layer dispersed by 11:00AM and settled in again after 6:00PM. The highest instantaneous dust concentration exceedances occurred between 7:00PM and 10:30PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions. | No field modifications necessary. |

TABLE 2

## December Daily Average Dust Monitoring Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

| Week ending December 1st  |   |   |   |   |   |   |
|---------------------------|---|---|---|---|---|---|
| Date                      | Monday, November 26, 2012                       | Tuesday, November 27, 2012                      | Wednesday, November 28, 2012                    | Thursday, November 29, 2012                     | Friday, November 30, 2012                       | Saturday, December 01, 2012                     |
| Location                  | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) |
| South                     |   |   |   |   |   | 23  |
| West                      |   |   |   |   |   | 6   |
| East                      |   |   |   |   |   | 21  |
| North                     |   |   |   |   |   | ND  |
| North East                |   |   |   |   |   | 16  |
| North West                |   |   |   |   |   | 13  |
| Calavera                  |   |   |   |   |   | 9   |
| Arroyo West               |   |   |   |   |   | 19  |
| Arroyo South              |   |   |   |   |   | 20  |
| Arroyo North              |   |   |   |   |   | 26  |
| Week ending December 8th  |   |   |   |   |   |   |
| Date                      | Monday, December 03, 2012                       | Tuesday, December 04, 2012                      | Wednesday, December 05, 2012                    | Thursday, December 06, 2012                     | Friday, December 07, 2012                       | Saturday, December 08, 2012                     |
| Location                  | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) |
| South                     | 10  | 13  | 43  | 32  | 10  | 12  |
| West                      | 4   | 9   | 11  | 9   | 4   | 3   |
| East                      | 10  | 18  | 33  | 28  | 17  | 11  |
| North                     | ND  | ND  | ND  | ND  | ND  | ND  |
| North East                | 8   | 15  | 31  | 24  | 11  | 7   |
| North West                | 7   | 17  | 33  | 24  | 10  | 7   |
| Calavera                  | 3   | 7   | 19  | 11  | 5   | 3   |
| Arroyo West               | 12  | 23  | 45  | 34  | 17  | 10  |
| Arroyo South              | 9   | 21  | 49  | 26  | 12  | 9   |
| Arroyo North              | 7   | 16  | 39  | 28  | 12  | 8   |
| Week ending December 15th |   |   |   |   |   |   |
| Date                      | Monday, December 10, 2012                       | Tuesday, December 11, 2012                      | Wednesday, December 12, 2012                    | Thursday, December 13, 2012                     | Friday, December 14, 2012                       | Saturday, December 15, 2012                     |
| Location                  | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) |
| South                     | 17  | 49  | 151   | 43  | 21  | 21  |
| West                      | 6   | 15  | 35  | 11  | 11  | 6   |
| East                      | 14  | 42  | 144   | 45  | 27  | 16  |
| North                     | ND  | ND  | 99  | 31  | 16  | 8   |
| North East                | 11  | 38  | 120   | 39  | 33  | 14  |
| North West                | 13  | 38  | 110   | 43  | 18  | 15  |
| Calavera                  | 9   | 25  | 62  | 20  | 7   | 9   |
| Arroyo West               | 15  | 45  | 128   | 55  | 28  | 18  |
| Arroyo South              | 14  | 52  | 157   | 49  | 35  | 18  |
| Arroyo North              | 18  | 52  | 128   | 44  | 36  | 16  |
| Week ending December 22nd |   |   |   |   |   |   |
| Date                      | Monday, December 17, 2012                       | Tuesday, December 18, 2012                      | Wednesday, December 19, 2012                    | Thursday, December 20, 2012                     | Friday, December 21, 2012                       | Saturday, December 22, 2012                     |
| Location                  | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) |
| South                     | 8   | 57  | 65  | 61  |   |   |
| West                      | 3   | 17  | 45  | 4   |   |   |
| East                      | 9   | 29  | 97  | 53  |   |   |
| North                     | 12  | 50  | 46  | 33  |   |   |
| North East                | 7   | 37  | 73  | 41  |   |   |
| North West                | 6   | 32  | 59  | 45  |   |   |
| Calavera                  | 4   | 15  | 23  | 19  |   |   |
| Arroyo West               | 9   | 47  | 84  | 49  |   |   |
| Arroyo South              | 9   | 45  | 83  | 48  |   |   |
| Arroyo North              | 8   | 36  | 74  | 43  |   |   |
| Week ending December 29th |   |   |   |   |   |   |
| Date                      | Monday, December 24, 2012                       | Tuesday, December 25, 2012                      | Wednesday, December 26, 2012                    | Thursday, December 27, 2012                     | Friday, December 28, 2012                       | Saturday, December 29, 2012                     |
| Location                  | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) |
| South                     |   |   |   |   |   |   |
| West                      |   |   |   |   |   |   |
| East                      |   |   |   |   |   |   |
| North                     |   |   |   |   |   |   |
| North East                |   |   |   |   |   |   |
| North West                |   |   |   |   |   |   |
| Calavera                  |   |   |   |   |   |   |
| Arroyo West               |   |   |   |   |   |   |
| Arroyo South              |   |   |   |   |   |   |
| Arroyo North              |   |   |   |   |   |   |
| Week ending January 5th   |   |   |   |   |   |   |
| Date                      | Monday, December 31, 2012                       | Tuesday, January 01, 2013                       | Wednesday, January 02, 2013                     | Thursday, January 03, 2013                      | Friday, January 04, 2013                        | Saturday, January 05, 2013                      |
| Location                  | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) | Average Reading<br>( $\mu\text{g}/\text{m}^3$ ) |
| South                     |   |   |   |   |   |   |
| West                      |   |   |   |   |   |   |
| East                      |   |   |   |   |   |   |
| North                     |   |   |   |   |   |   |
| North East                |   |   |   |   |   |   |
| North West                |   |   |   |   |   |   |
| Calavera                  |   |   |   |   |   |   |
| Arroyo West               |   |   |   |   |   |   |
| Arroyo South              |   |   |   |   |   |   |
| Arroyo North              |   |   |   |   |   |   |

**NOTES:**

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



Dust Monitor Summary  
South Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

| Date       | Location | Comments   |
|------------|----------|--|
| 2/28/2012  | South    | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 3/7/2012   | South    | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 5/23/2012  | South    | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations downwind monitoring locations. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 11/1/2012  | South    | Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20°F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 11/2/2012  | South    | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 11/7/2012  | South    | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 11/10/2012 | South    | Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. A background dust evaluation was conducted on the elevated data using the upwind (West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the two downwind locations resulted in the actual dust generated on site to be 43 µg/m <sup>3</sup> which is at the site-specific sentinel value of 43 µg/m <sup>3</sup> .   |
| 11/14/2012 | South    | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.  |

Dust Monitor Summary  
South Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

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

Dust Monitor Summary  
West Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

| Date       | Location | Comments   |
|------------|----------|--|
| 2/7/2012   | West     | Demolition activities were conducted northeast, and within 100 feet of the West Monitor. Dust suppression was implemented, and visible dust was not observed to be migrating towards the monitor. A background dust evaluation was conducted on the elevated data and resulted in the actual dust generated on site to be 32 µg/m <sup>3</sup> which is below the site-specific sentinel value of 43 µg/m <sup>3</sup> .   |
| 2/8/2012   | West     | Demolition activities were conducted southeast, and within 100 feet, of the West Monitor. Dust suppression was implemented, and visible dust was not observed to be migrating towards the monitor. A background dust evaluation was conducted on the elevated data and resulted in the actual dust generated on site to be 28 µg/m <sup>3</sup> which is below the site-specific sentinel value of 43 µg/m <sup>3</sup> .  |
| 2/28/2012  | West     | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 3/6/2012   | West     | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 3/7/2012   | West     | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 3/9/2012   | West     | Demolition activities were conducted within 100 ft of the West monitor. Visible dust was generated from the work activities and dust suppression was implemented. Exhaust from the heavy equipment also contributed to the elevated reading. Corrective actions were taken to increase dust suppression for these demolition activities.   |
| 3/12/2012  | West     | Demolition activities were conducted within 200 ft of the West monitor. Dust suppression was implemented and no visible dust was observed to be migrating towards the monitor. Exhaust from the heavy equipment in the area was migrating towards the monitor and contributed to the elevated reading. A background dust evaluation was conducted on the elevated data and resulted in the actual dust generated on site to be 28 µg/m <sup>3</sup> which is below the site-specific sentinel value of 43 µg/m <sup>3</sup> .  |
| 5/23/2012  | West     | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations downwind monitoring locations. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 12/5/2012  | West     | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty percent of the instantaneous exceedances occurred before or after working hours. While only the above listed monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were present at all monitors. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions. |
| 12/11/2012 | West     | Ninety-five percent of instantaneous exceedances occurred in the evening, after working hours. Dust suppression was implemented as necessary during working hours. An evening inversion layer settled in at night and trapped widespread and offsite particulate matter. The elevated dust concentrations for the day are attributed to meteorological conditions.   |
| 12/12/2012 | West     | An inversion layer settled into the El Paso region in the evening on December 11th, dissipated by noon on December 12th, and then settled back in the area by early evening. Widespread and offsite particulate matter was trapped by this inversion, which resulted in instantaneous dust exceedances with the highest readings occurring from 4:00PM to 11:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.   |

Dust Monitor Summary  
North West Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

| Date       | Location   | Comments  |
|------------|------------|---|
| 12/1/2011  | North West | Windy and hazy conditions existed throughout the day and the surrounding atmospheric conditions were poor. Subtracting background dust from the average dust reading for the North West monitor results in the actual dust generated on site to be 27 µg/m <sup>3</sup> for the North West monitor. Accounting for background dust concentration places site generated dust below the sentinel value.   |
| 4/14/2012  | North West | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions.   |
| 6/29/2012  | North West | Wind gust speeds up to 37 mph were present in the El Paso area in the evening. The prevailing wind direction that day was from the south. A background dust evaluation was conducted on the elevated data using the upwind (South) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North West (downwind) location resulted in the actual dust generated on site to be 21 µg/m <sup>3</sup> which is below the site-specific sentinel value of 43 µg/m <sup>3</sup> .   |
| 8/13/2012  | North West | Wind gust speeds up to 41 mph were present in the El Paso area in the evening. The prevailing wind direction that day was from the East. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo South) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North West (downwind) location resulted in the actual dust generated on site to be 21 µg/m <sup>3</sup> which is below the site-specific sentinel value of 43 µg/m <sup>3</sup> .   |
| 11/1/2012  | North West | Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20°F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 11/10/2012 | North West | Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. A background dust evaluation was conducted on the elevated data using the upwind (West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the two downwind locations resulted in the actual dust generated on site to be 43 µg/m <sup>3</sup> which is at the site-specific sentinel value of 43 µg/m <sup>3</sup> .  |
| 11/28/2012 | North West | The prevailing wind was from the northeast that day. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo North) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North West (downwind) location resulted in the actual dust generated on site to be 11 µg/m <sup>3</sup> which is below the site-specific sentinel value of 43 µg/m <sup>3</sup> . No increase in dust suppression activities was conducted. The elevated dust concentrations for the day are attributed to off-site conditions.   |
| 11/29/2012 | North West | The prevailing wind was from the southwest that day. For the main site work area, a background dust evaluation was conducted on the elevated data using the upwind (West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North West (downwind) location resulted in the actual dust generated on site to be 34 µg/m <sup>3</sup> which is below the site-specific sentinel value of 43 µg/m <sup>3</sup> . No increase in dust suppression activities was conducted. For the east property work area, a background dust evaluation was conducted on the elevated data using the upwind monitor. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the downwind location resulted in the actual dust generated on site to be 22 µg/m <sup>3</sup> which is below the site-specific sentinel value of 43 µg/m <sup>3</sup> . No increase in dust suppression activities was conducted. The elevated dust concentrations for the day are attributed to off-site conditions. |



Dust Monitor Summary  
North West Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

| Date       | Location   | Comments   |
|------------|------------|--|
| 12/19/2012 | North West | Wind gusts up to 62 mph were present in the El Paso area with an average wind speed of 21 mph prevailing from the west. Due to the high winds widespread dust was present in the area from 8:00AM to 4:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.   |
| 12/20/2012 | North West | An early morning inversion layer settled in the El Paso area before and after working hours which trapped offsite and widespread particulate matter. The inversion layer dispersed by 11:00AM and settled in again after 6:00PM. The highest instantaneous dust concentration exceedances occurred between 7:00PM and 10:30PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions. |

Dust Monitor Summary  
North Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

| Date       | Location | Comments   |
|------------|----------|--|
| 11/2/2011  | North    | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 11/30/2011 | North    | The surrounding atmosphere was hazy throughout the day. Monitor stations upwind of site activities and monitors with no demolition activities in their proximity recorded elevated data. The elevated readings are attributed to off-site conditions.  |
| 4/26/2012  | North    | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 11/1/2012  | North    | Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20°F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 11/2/2012  | North    | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 11/8/2012  | North    | The North monitor had an error flow reading before the start of the work day and stopped recording before worked commenced. The exceedance is attributed to the early morning inversion layer and limited data recorded for this day.  |
| 12/12/2012 | North    | An inversion layer settled into the El Paso region in the evening on December 11th, dissipated by noon on December 12th, and then settled back in the area by early evening. Widespread and offsite particulate matter was trapped by this inversion, which resulted in instantaneous dust exceedances with the highest readings occurring from 4:00PM to 11:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.   |
| 12/18/2012 | North    | A cold front entered the El Paso area creating an inversion layer in the evening after working hours. Instantaneous dust concentration exceedances began after 5:00PM and continued throughout the evening. While only the above listed monitors show daily average dust concentrations greater than the sentinel value all monitors had instantaneous exceedances throughout the evening. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.   |
| 12/19/2012 | North    | Wind gusts up to 62 mph were present in the El Paso area with an average wind speed of 21 mph prevailing from the west. Due to the high winds widespread dust was present in the area from 8:00AM to 4:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.   |

Dust Monitor Summary  
North East Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

| Date       | Location   | Comments   |
|------------|------------|--|
| 12/1/2011  | North East | Windy and hazy conditions existed throughout the day, and the surrounding atmospheric conditions were poor. Subtracting background dust from the average dust reading for the North East monitor results in the actual dust generated on site to be 30 ug/m <sup>3</sup> for the North East monitor. Accounting for background dust concentration places site generated dust below the sentinel value.   |
| 2/28/2012  | North East | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 4/14/2012  | North East | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 4/26/2012  | North East | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 6/15/2012  | North East | Wind gust speeds up to 66 mph were present in the El Paso area from the early afternoon hours until the evening hours causing elevated dust concentrations at downwind monitoring locations. The prevailing wind direction that day was from the northwest. A background dust evaluation was conducted on the elevated data using the upwind (North West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East (downwind) location resulted in the actual dust generated on site to be 17 µg/m <sup>3</sup> which is below the site-specific sentinel value of 43 µg/m <sup>3</sup> .   |
| 11/1/2012  | North East | Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20°F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 11/10/2012 | North East | Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. A background dust evaluation was conducted on the elevated data using the upwind (West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the two downwind locations resulted in the actual dust generated on site to be 43 µg/m <sup>3</sup> which is at the site-specific sentinel value of 43 µg/m <sup>3</sup> .   |
| 12/19/2012 | North East | Wind gusts up to 62 mph were present in the El Paso area with an average wind speed of 21 mph prevailing from the west. Due to the high winds widespread dust was present in the area from 8:00AM to 4:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.   |

Dust Monitor Summary  
East Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

| Date      | Location | Comments   |
|-----------|----------|--|
| 1/16/2012 | East     | The daily average dust concentration for the East monitor was greater than the sentinel value. Windy and hazy conditions existed in the El Paso and Juarez area. The National Weather Service issued a Hazardous Weather Outlook for the afternoon, and wind speeds up to 35 mph were recorded on site. Demolition activities were taking place near the monitor, and dust suppression activities were implemented during the demolition activities. However, visible dust from areas without active demolition was observed to migrating towards the monitor when wind speeds were high. A background dust evaluation was conducted on the elevated data and resulted in the actual dust generated on site to be 31 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$ .   |
| 2/28/2012 | East     | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 3/6/2012  | East     | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 3/7/2012  | East     | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 4/2/2012  | East     | Dusty and windy conditions existed in the El Paso area. No demolition activities took place in the proximity of the monitor. However, visible dust from areas without active demolition was observed to be migrating towards the monitor when wind speeds were high. A background dust evaluation was conducted on the elevated data using the upwind (West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East location resulted in the actual dust generated on site to be 32 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$ .   |
| 5/23/2012 | East     | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations downwind monitoring locations. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 6/15/2012 | East     | Wind gust speeds up to 66 mph were present in the El Paso area from the early afternoon hours until the evening hours causing elevated dust concentrations at downwind monitoring locations. The prevailing wind direction that day was from the northwest. A background dust evaluation was conducted on the elevated data using the upwind (North West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East (downwind) location resulted in the actual dust generated on site to be 17 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$ .   |
| 11/1/2012 | East     | Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20°F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 11/2/2012 | East     | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.  |



Dust Monitor Summary  
East Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

| Date       | Location | Comments   |
|------------|----------|--|
| 11/7/2012  | East     | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 11/10/2012 | East     | Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. A background dust evaluation was conducted on the elevated data using the upwind (West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the two downwind locations resulted in the actual dust generated on site to be 43 µg/m <sup>3</sup> which is at the site-specific sentinel value of 43 µg/m <sup>3</sup> . |
| 11/14/2012 | East     | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 11/28/2012 | East     | The prevailing wind was from the northeast that day. A background dust evaluation was conducted on the elevated data using the upwind (Arroyo North) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the North West (downwind) location resulted in the actual dust generated on site to be 11 µg/m <sup>3</sup> which is below the site-specific sentinel value of 43 µg/m <sup>3</sup> . No increase in dust suppression activities was conducted. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 11/30/2012 | East     | The prevailing wind was from the south that day. A background dust evaluation was conducted on the elevated data using the upwind (South) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East (downwind) location resulted in the actual dust generated on site to be 22 µg/m <sup>3</sup> which is below the site-specific sentinel value of 43 µg/m <sup>3</sup> . No increase in dust suppression activities was conducted. The elevated dust concentrations for the day are attributed to off-site conditions.   |
| 12/13/2012 | East     | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. All instantaneous exceedances occurred before or after working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.  |
| 12/19/2012 | East     | Wind gusts up to 62 mph were present in the El Paso area with an average wind speed of 21 mph prevailing from the west. Due to the high winds widespread dust was present in the area from 8:00AM to 4:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.   |
| 12/20/2012 | East     | An early morning inversion layer settled in the El Paso area before and after working hours which trapped offsite and widespread particulate matter. The inversion layer dispersed by 11:00AM and settled in again after 6:00PM. The highest instantaneous dust concentration exceedances occurred between 7:00PM and 10:30PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.   |

Dust Monitor Summary  
Calavera Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

| Date      | Location | Comments  |
|-----------|----------|---|
| 4/14/2012 | Calavera | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 4/26/2012 | Calavera | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions.             |

Dust Monitor Summary  
Arroyo West Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

| Date       | Location    | Comments   |
|------------|-------------|--|
| 4/14/2012  | Arroyo West | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 4/26/2012  | Arroyo West | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 6/2/2012   | Arroyo West | Windy conditions with wind gusts up to 17 mph were present in the El Paso area from late afternoon and into the evening causing elevated dust concentrations at downwind monitoring locations. A background dust evaluation was conducted on the elevated data using the upwind (East) monitor location. The prevailing wind direction that day was from the southeast. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West (downwind) location resulted in the actual dust generated on site to be $6 \mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of $43 \mu\text{g}/\text{m}^3$ .   |
| 6/15/2012  | Arroyo West | Wind gust speeds up to 66 mph were present in the El Paso area from the early afternoon hours until the evening hours causing elevated dust concentrations at downwind monitoring locations. The prevailing wind direction that day was from the northwest. A background dust evaluation was conducted on the elevated data using the upwind (North West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East (downwind) location resulted in the actual dust generated on site to be $17 \mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of $43 \mu\text{g}/\text{m}^3$ .   |
| 11/1/2012  | Arroyo West | Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20°F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 11/2/2012  | Arroyo West | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 11/10/2012 | Arroyo West | Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. A background dust evaluation was conducted on the elevated data using the upwind (West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the two downwind locations resulted in the actual dust generated on site to be $43 \mu\text{g}/\text{m}^3$ which is at the site-specific sentinel value of $43 \mu\text{g}/\text{m}^3$ .   |

Dust Monitor Summary  
Arroyo West Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

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

Dust Monitor Summary  
Arroyo South Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

| Date       | Location     | Comments   |
|------------|--------------|--|
| 12/10/2011 | Arroyo South | The surrounding atmosphere was generally hazy throughout the day. The smell of smoke was observed onsite indicating that smoke particles from surrounding fires were migrating onto the site. Perimeter monitoring stations, including monitors upwind of site activities and monitors with no construction activities in their proximity, recorded elevated data. The elevated readings are attributed to off-site conditions.  |
| 1/31/2012  | Arroyo South | The daily average dust concentration for the Arroyo South monitor was greater than the sentinel value. Landfill construction activities took place immediately upwind of the monitor during the afternoon hours. Dust suppression was implemented to reduce the dust generated by the activity. Additionally, the monitor was re-located to a position further downwind of the construction activities to protect the monitor from damage and allow for accurate measurement of dust concentrations leaving the area. Elevated dust concentrations were not observed at monitors located off-site and downwind of the Arroyo south monitor. A background dust evaluation was conducted using the upwind (Arroyo North) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo South location resulted in the actual dust generated on site to be 29 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$ .   |
| 2/28/2012  | Arroyo South | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 4/14/2012  | Arroyo South | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 4/26/2012  | Arroyo South | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 6/15/2012  | Arroyo South | Wind gust speeds up to 66 mph were present in the El Paso area from the early afternoon hours until the evening hours causing elevated dust concentrations at downwind monitoring locations. The prevailing wind direction that day was from the northwest. A background dust evaluation was conducted on the elevated data using the upwind (North West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East (downwind) location resulted in the actual dust generated on site to be 17 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$ .   |
| 11/1/2012  | Arroyo South | Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20°F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 11/2/2012  | Arroyo South | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.  |

Dust Monitor Summary  
Arroyo South Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

| Date       | Location     | Comments   |
|------------|--------------|--|
| 11/7/2012  | Arroyo South | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 11/10/2012 | Arroyo South | Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. A background dust evaluation was conducted on the elevated data using the upwind (West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the two downwind locations resulted in the actual dust generated on site to be 43 µg/m <sup>3</sup> which is at the site-specific sentinel value of 43 µg/m <sup>3</sup> . |
| 11/14/2012 | Arroyo South | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 12/5/2012  | Arroyo South | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. Eighty percent of the instantaneous exceedances occurred before or after working hours. While only the above listed monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were present at all monitors. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.   |
| 12/11/2012 | Arroyo South | Ninety-five percent of instantaneous exceedances occurred in the evening, after working hours. Dust suppression was implemented as necessary during working hours. An evening inversion layer settled in at night and trapped widespread and offsite particulate matter. The elevated dust concentrations for the day are attributed to meteorological conditions.   |
| 12/13/2012 | Arroyo South | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. All instantaneous exceedances occurred before or after working hours. When taking the daily average over the working hours (8:00AM-6:00PM) the average dust concentration was below the site-specific sentinel value. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.  |
| 12/18/2012 | Arroyo South | A cold front entered the El Paso area creating an inversion layer in the evening after working hours. Instantaneous dust concentration exceedances began after 5:00PM and continued throughout the evening. While only the above listed monitors show daily average dust concentrations greater than the sentinel value all monitors had instantaneous exceedances throughout the evening. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.   |
| 12/19/2012 | Arroyo South | Wind gusts up to 62 mph were present in the El Paso area with an average wind speed of 21 mph prevailing from the west. Due to the high winds widespread dust was present in the area from 8:00AM to 4:00PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.   |
| 12/20/2012 | Arroyo South | An early morning inversion layer settled in the El Paso area before and after working hours which trapped offsite and widespread particulate matter. The inversion layer dispersed by 11:00AM and settled in again after 6:00PM. The highest instantaneous dust concentration exceedances occurred between 7:00PM and 10:30PM. Dust suppression was implemented as necessary during working hours. The elevated dust concentrations for the day are attributed to meteorological conditions.   |

Dust Monitor Summary  
Arroyo North Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

| Date       | Location     | Comments   |
|------------|--------------|--|
| 4/14/2012  | Arroyo North | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 4/26/2012  | Arroyo North | Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 6/2/2012   | Arroyo North | Windy conditions with wind gusts up to 17 mph were present in the El Paso area from late afternoon and into the evening causing elevated dust concentrations at downwind monitoring locations. A background dust evaluation was conducted on the elevated data using the upwind (East) monitor location. The prevailing wind direction that day was from the southeast. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo West (downwind) location resulted in the actual dust generated on site to be 6 µg/m <sup>3</sup> which is below the site-specific sentinel value of 43 µg/m <sup>3</sup> .   |
| 6/15/2012  | Arroyo North | Wind gust speeds up to 66 mph were present in the El Paso area from the early afternoon hours until the evening hours causing elevated dust concentrations at downwind monitoring locations. The prevailing wind direction that day was from the northwest. A background dust evaluation was conducted on the elevated data using the upwind (North West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the East (downwind) location resulted in the actual dust generated on site to be 17 µg/m <sup>3</sup> which is below the site-specific sentinel value of 43 µg/m <sup>3</sup> .   |
| 11/1/2012  | Arroyo North | Meteorological conditions associated with high dust concentrations in El Paso were present in the early morning and evening hours when no demolition or remediation activities occurred. These meteorological conditions known as inversions trapped particulate matter in the air over the mountain basin in which El Paso is located. There was approximately a 20°F drop in temperature from sunset the previous day to before sunrise on this day which created an inversion trapping widespread dust from the city overnight. The monitors' instantaneous dust exceedances from 1:00 AM to 5:00 AM are attributed to the inversion effects. The cooling effect after sunset created an inversion which trapped the dust which resulting in instantaneous exceedances in the evening hours after demolition and remediation activities stopped for the day. During work hours, dust suppression was implemented as necessary. No exceedances occurred during the working hours after the inversion layer dissipated at noon. The elevated dust concentrations for the day are attributed to off-site conditions. |
| 11/2/2012  | Arroyo North | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.  |
| 11/10/2012 | Arroyo North | Windy conditions with wind gusts up to 50 mph were present in the El Paso area causing widespread dust and elevated dust concentrations at monitoring locations from noon to 4:00PM. Elevated dust concentrations were present throughout the work day. During the time when remediation and demolition activities were taking place, dust suppression was increased as necessary however, given the wind gusts offsite dust migration was present throughout the site. The prevailing wind direction that day was from the southwest. A background dust evaluation was conducted on the elevated data using the upwind (West) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the two downwind locations resulted in the actual dust generated on site to be 43 µg/m <sup>3</sup> which is at the site-specific sentinel value of 43 µg/m <sup>3</sup> .   |
| 11/14/2012 | Arroyo North | Early morning and evening meteorological inversion layer conditions contributed to the high levels of dust and the daily average dust concentration exceedance. During working hours the dust concentration average was below the sentinel value. The inversion layer dissipated by noon and there were no recorded exceedances in the afternoon. Dust suppression was implemented as necessary during working hours. While only some monitors reported daily average dust concentrations above the sentinel value, the instantaneous dust concentration exceedances were widespread and present at all monitors. The elevated dust concentrations for the day are attributed to off-site conditions.  |

Dust Monitor Summary  
Arroyo North Elevated Data Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

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

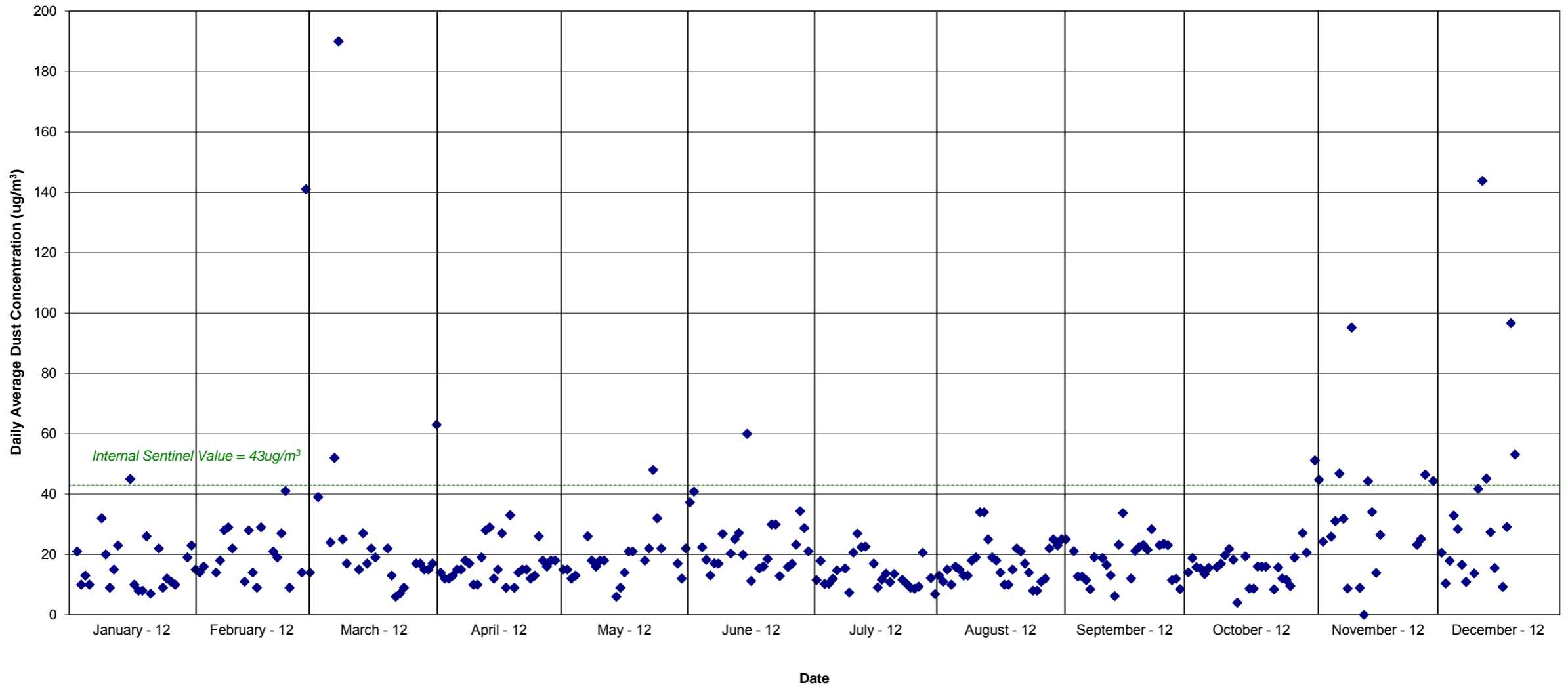




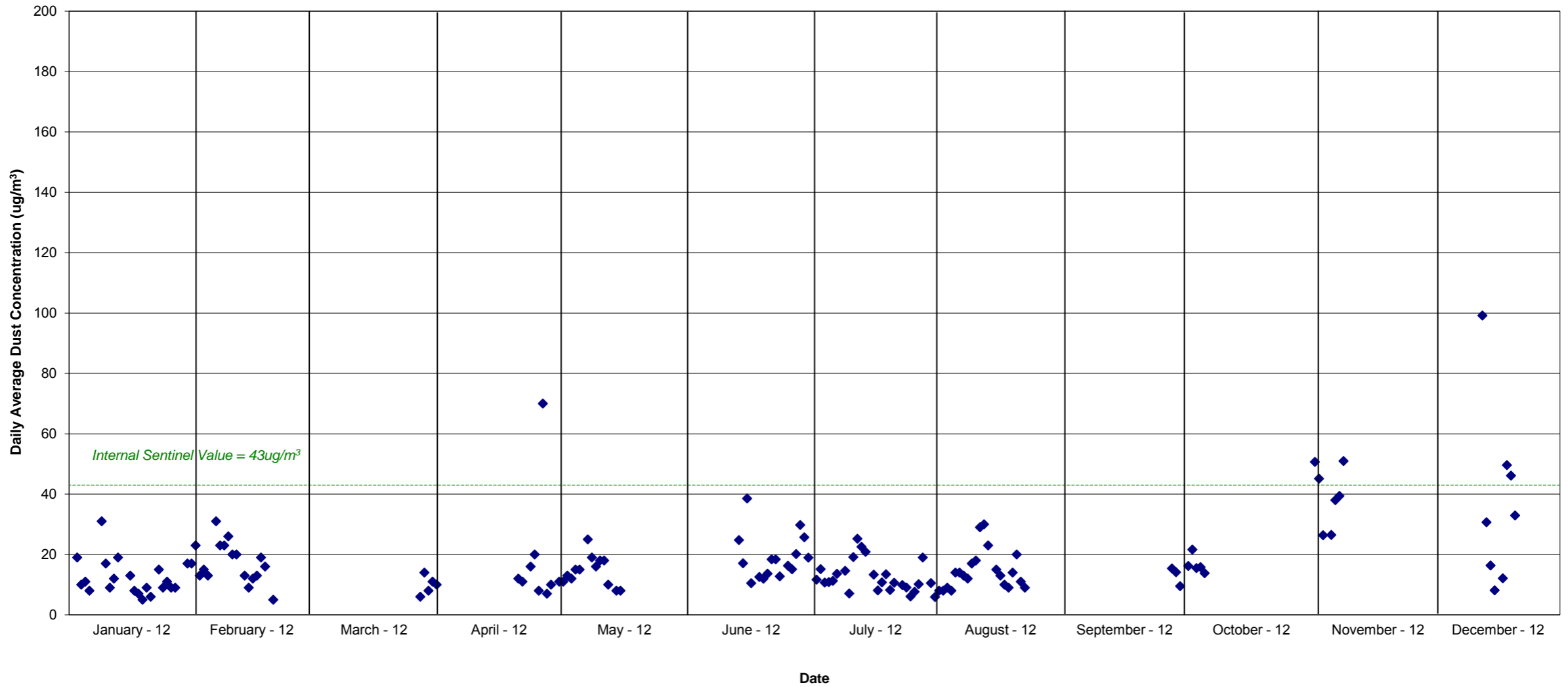
**Attachment D**

Dust Concentration Graphs

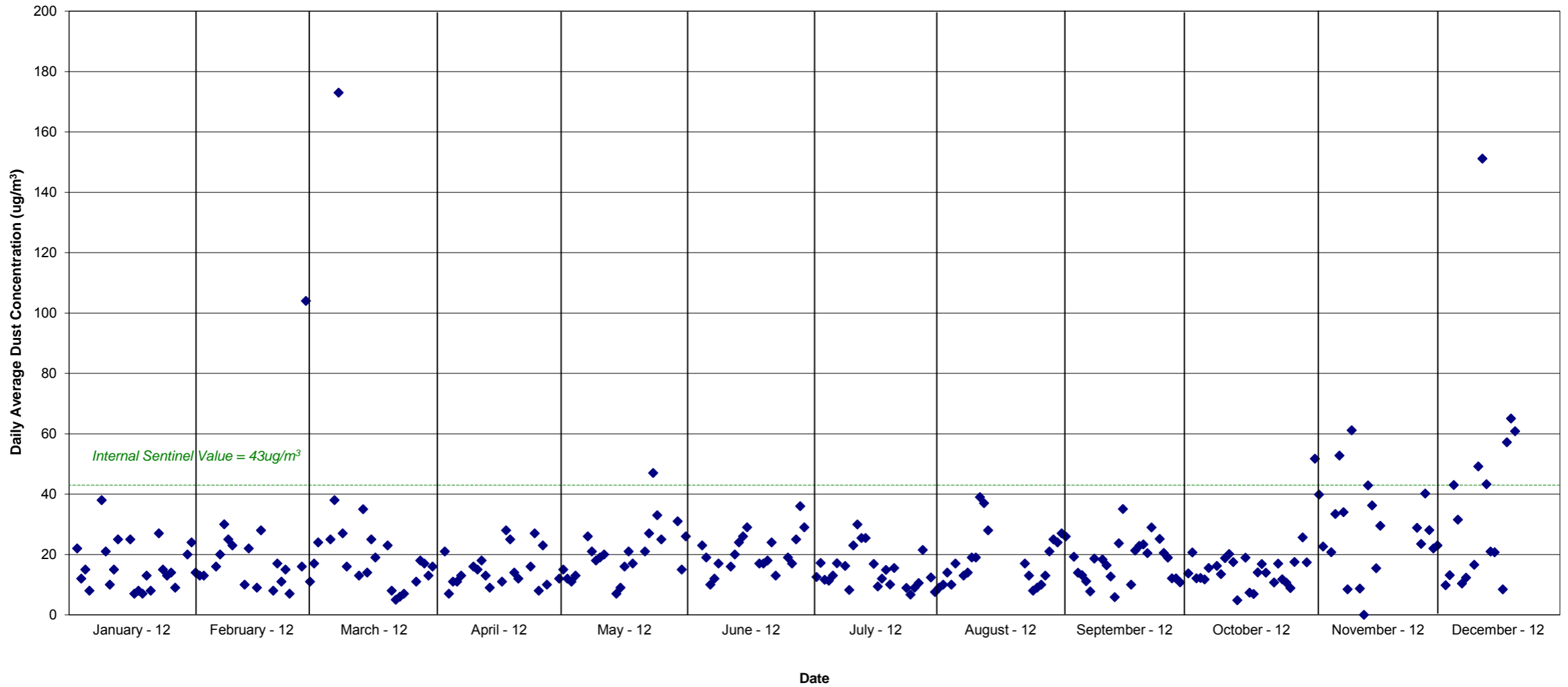
2012 Dust Monitor Summary  
East Monitor Location  
Former ASARCO Smelting Facility  
El Paso, Texas



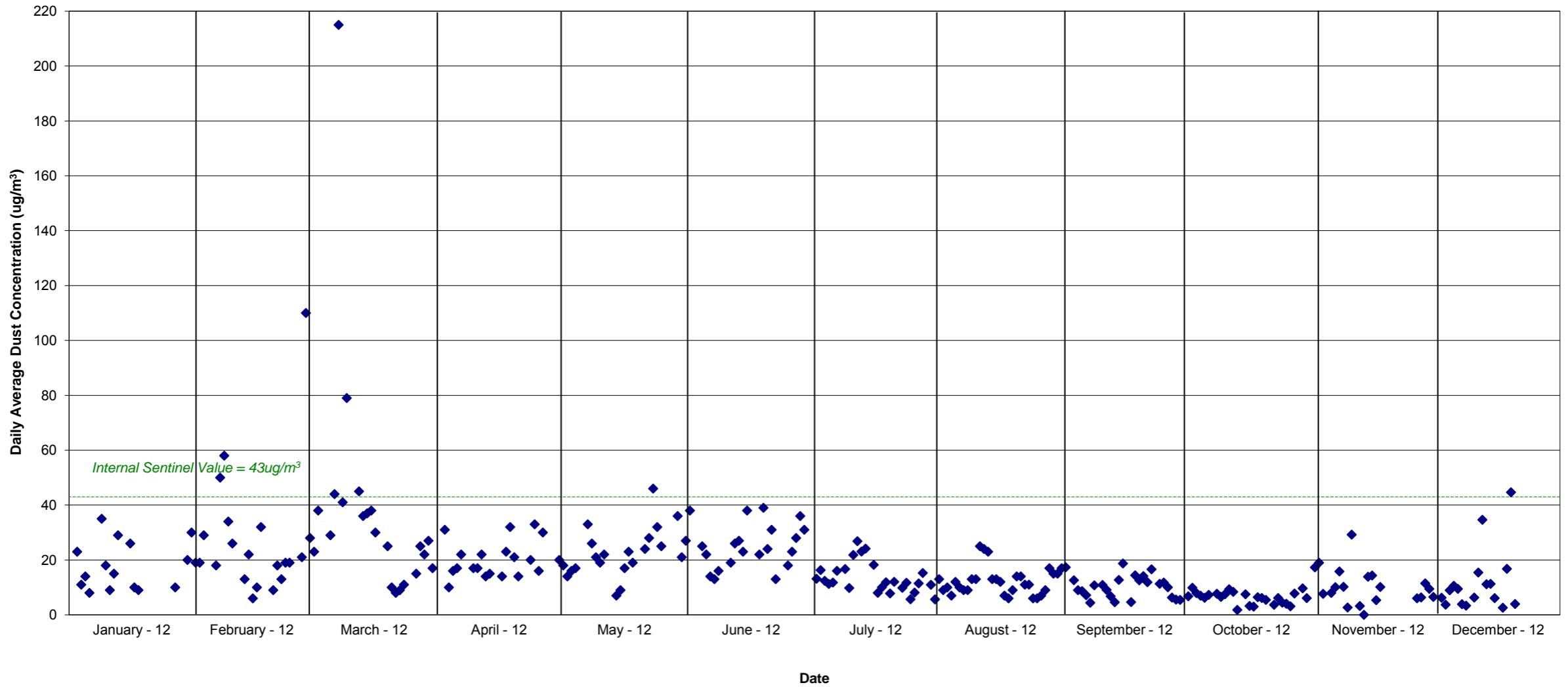
2012 Dust Monitor Summary  
North Monitor Location  
Former ASARCO Smelting Facility  
El Paso, Texas



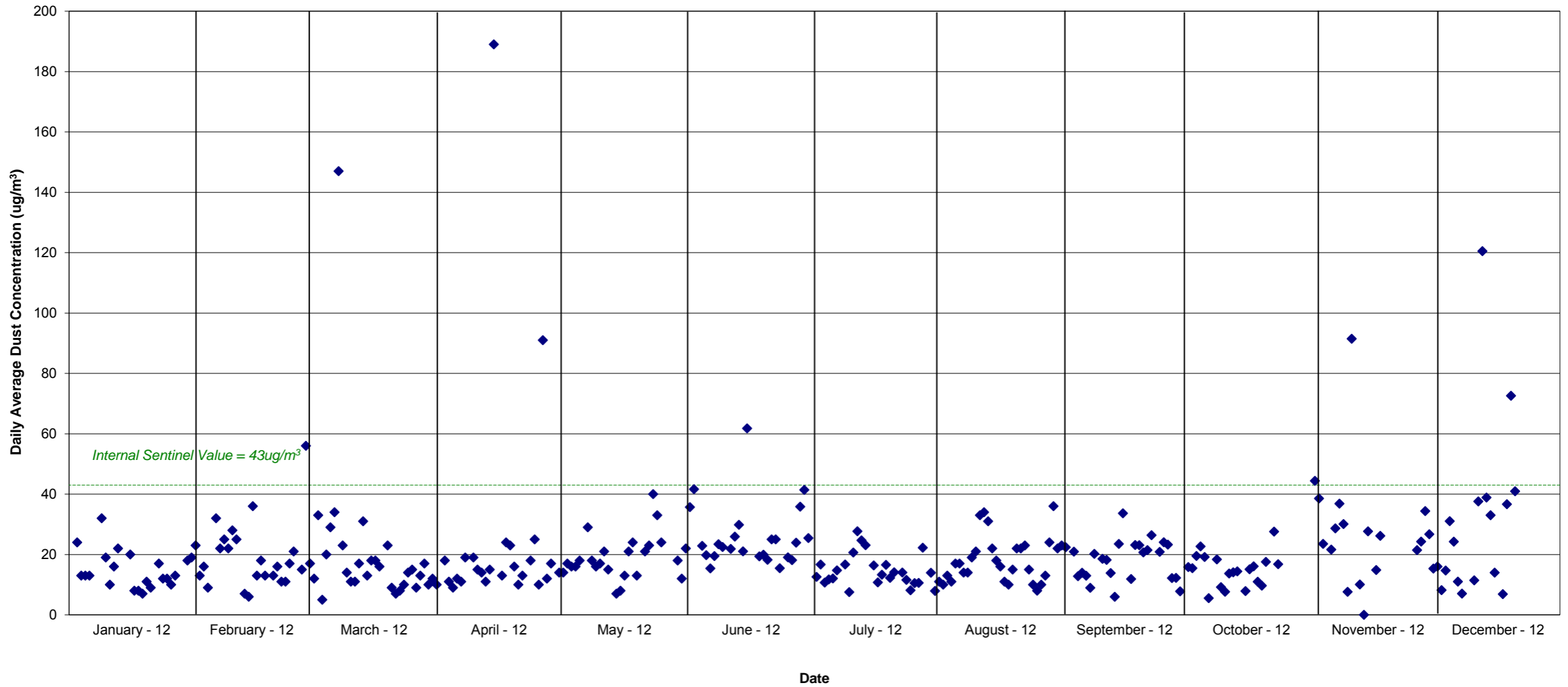
2012 Dust Monitor Summary  
South Monitor Location  
Former ASARCO Smelting Facility  
El Paso, Texas



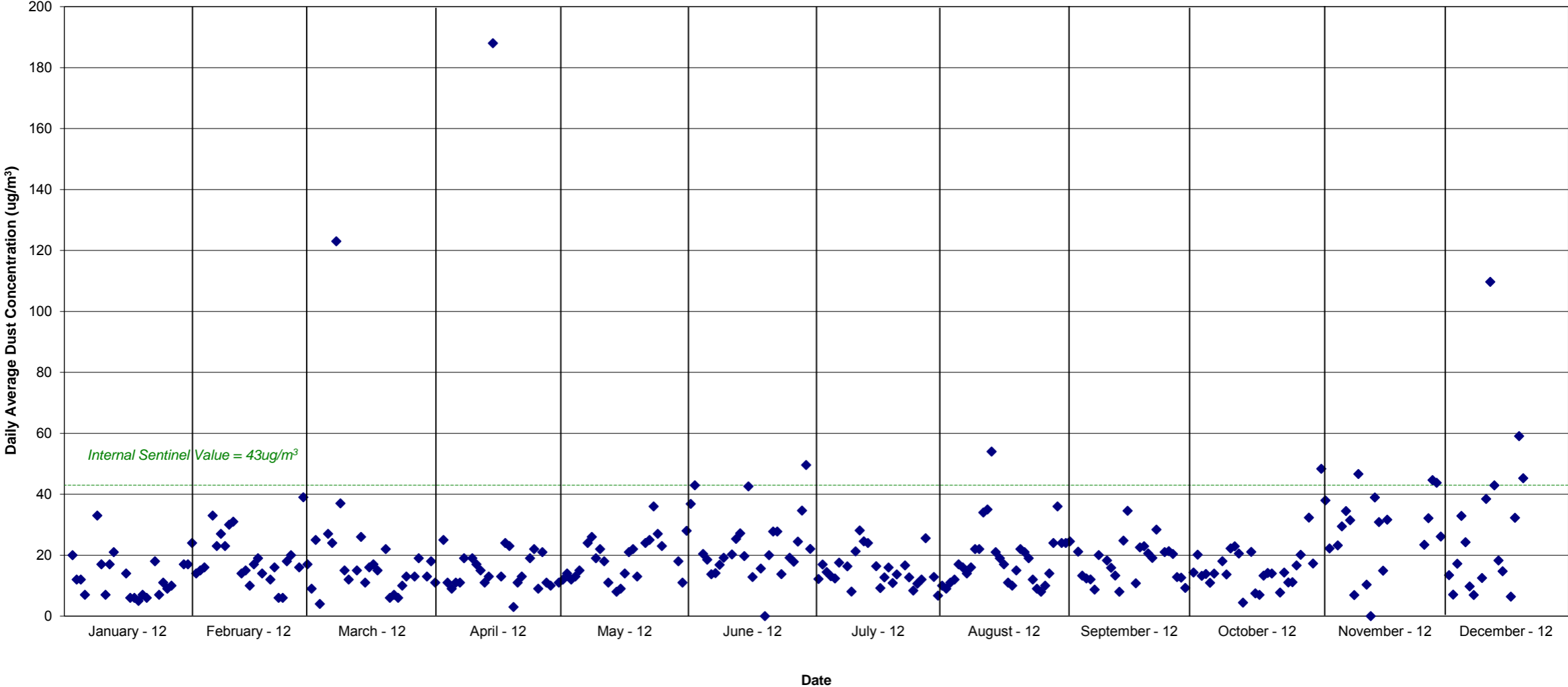
2012 Dust Monitor Summary  
West Monitor Location  
Former ASARCO Smelting Facility  
El Paso, Texas



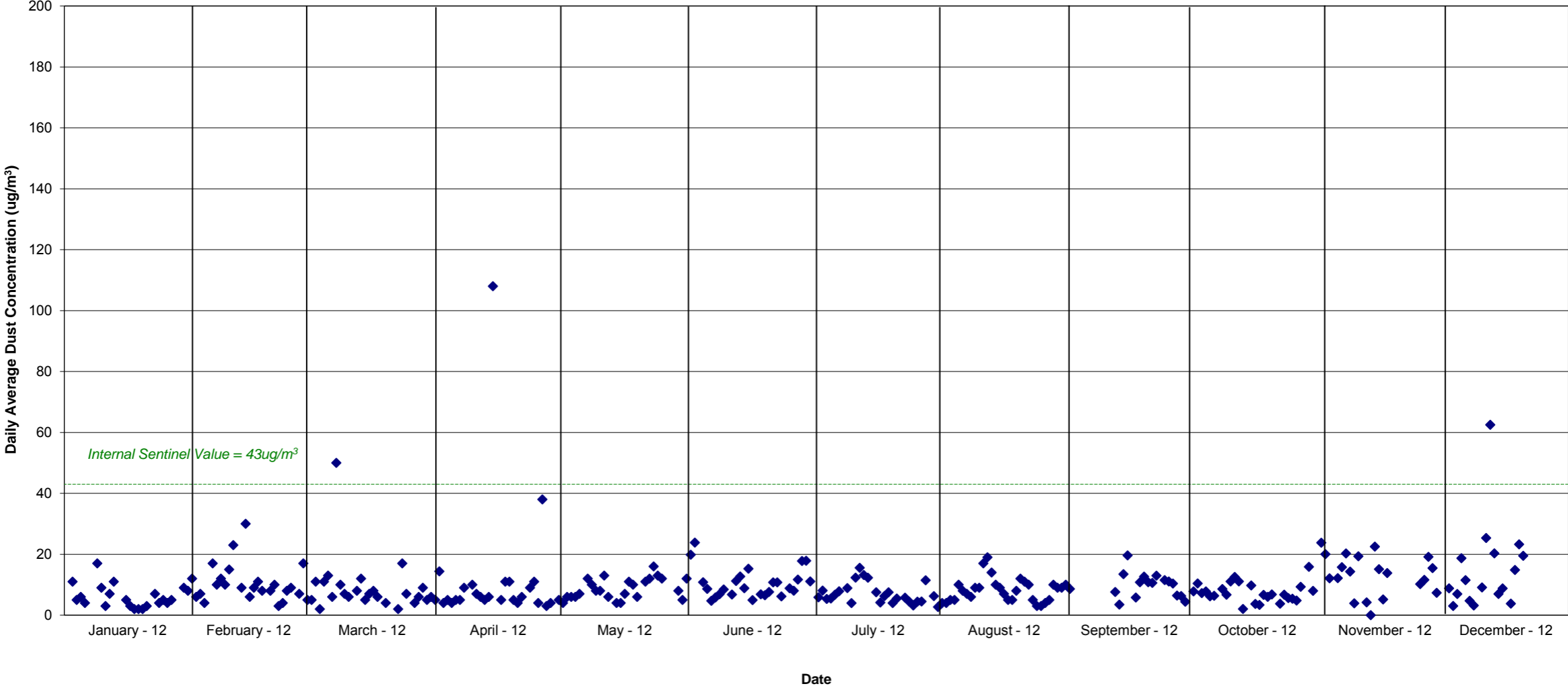
2012 Dust Monitor Summary  
North East Monitor Location  
Former ASARCO Smelting Facility  
El Paso, Texas



2012 Dust Monitor Summary  
North West Monitor Location  
Former ASARCO Smelting Facility  
El Paso, Texas

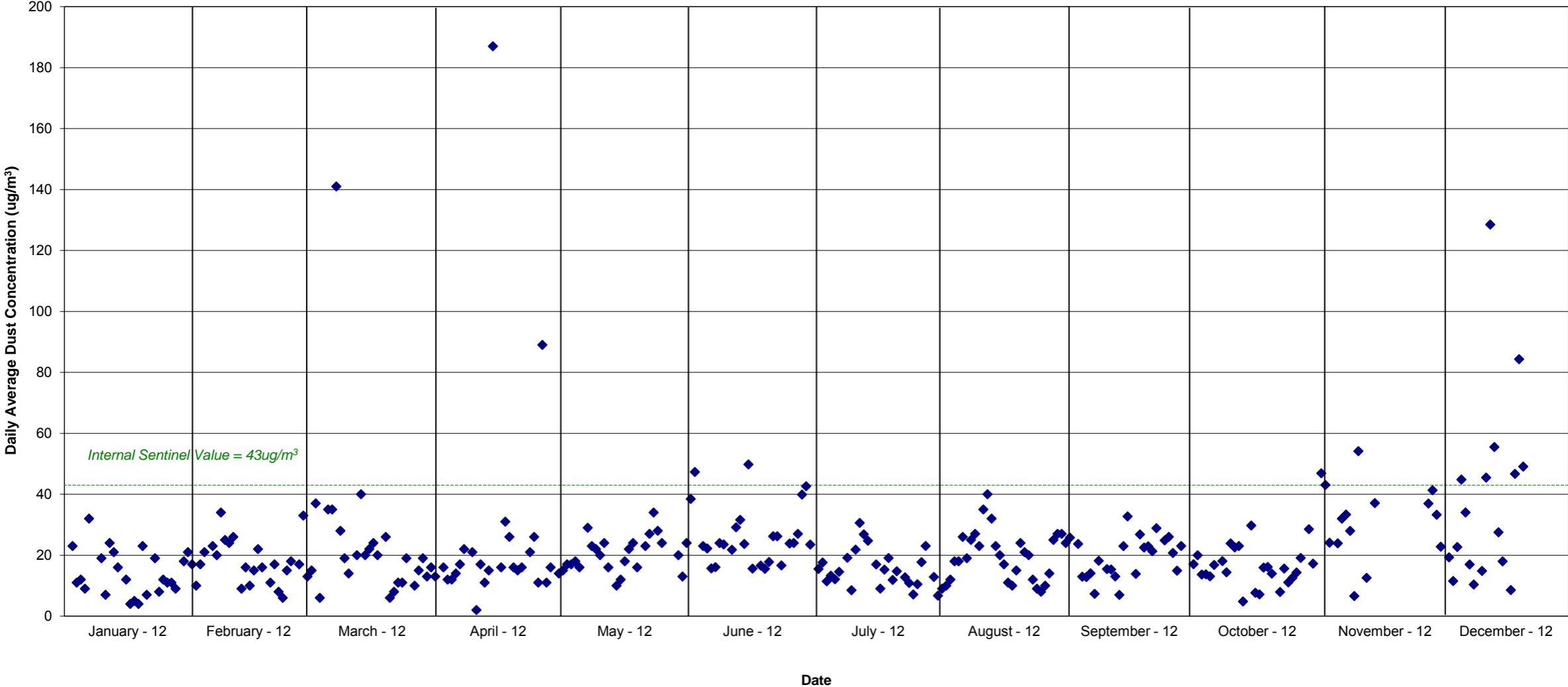


2012 Dust Monitor Summary  
Calavera Monitor Location  
Former ASARCO Smelting Facility  
El Paso, Texas

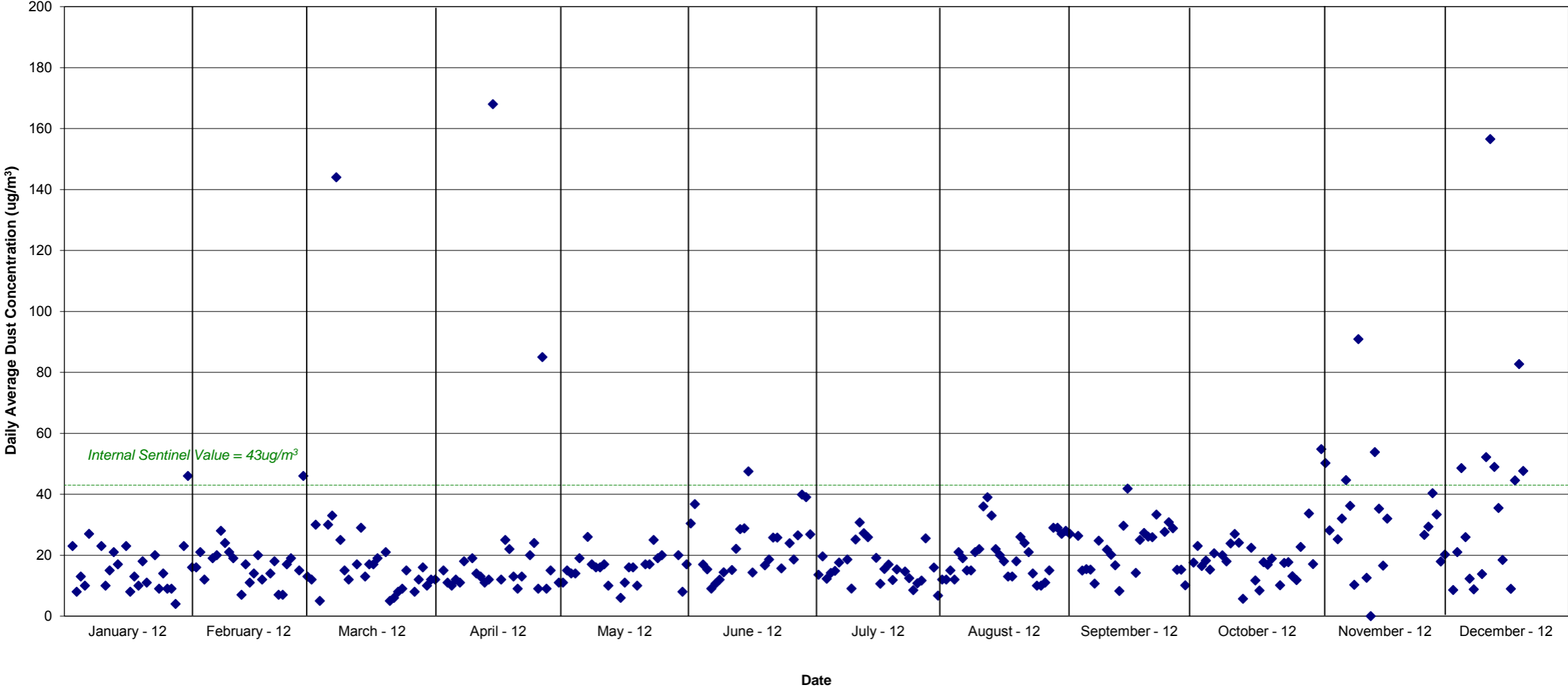




2012 Dust Monitor Summary  
Arroyo West Monitor Location  
Former ASARCO Smelting Facility  
El Paso, Texas



2012 Dust Monitor Summary  
Arroyo South Monitor Location  
Former ASARCO Smelting Facility  
El Paso, Texas



2012 Dust Monitor Summary  
Arroyo North Monitor Location  
Former ASARCO Smelting Facility  
El Paso, Texas

