

Response Information:

Regarding Asbestos information for the chimneys –

ACM Sample Data:

Samples of chimney materials were first collected for asbestos containing materials (ACM) in 2011. The sample results are included in an attached file (Chimney ACM Data.pdf). The following samples were collected from the 828-ft chimney:

- Gunitite mortar material from the inside of the inner stack (Sample IDs B11-5922; B11-5923; B11-5315). Results were non-detect for ACM.
- Fiberglass insulation on outside of inner stack (Sample ID B11-5924). Results were non-detect for ACM.
- Outer coating on fiberglass insulation on outside of inner stack (Sample ID B11-5925). Results were non-detect for ACM.
- East flue tar coating (Sample ID B11-5927). Results were 5%-10% Chrysotile.
- East flue tar cover coat (Sample ID B11-5926). Results were 4%-7% Chrysotile.
- West flue entrance gasket material (Sample ID B11-3484). Results were 50%-55% Chrysotile.

No gasket or insulation materials were observed in the 612-ft chimney.

In 2013, an additional sample was collected from the ground of the 828-ft chimney where a piece of black liner material assumed to have fallen from a higher elevation on the interior of the 828-ft chimney. This material was similar in appearance to a black liner material observed in chimney photos and consistent with a material applied at the top of the chimney interior as described in construction records. A sample was collected for ACM analyses. The sample result is included in the attached file (Chimney ACM Data.pdf) and is summarized below:

- Apparent black liner material (Sample ID B13-0646). Results were non-detect for ACM.

Based on construction records, ACM was not suspected in the concrete used to construct the chimneys. In response to a question posed in a letter received by the Trust on April 10, 2013, a portion of the concrete core sample collected for constituent analyses from each chimney was submitted to a laboratory for ACM analyses. The results are included in the attached file (Chimney ACM Data.pdf) and are summarized below:

- Concrete sample from the 612-ft chimney (Sample ID B13-2895). Results were non-detect for ACM.
- Concrete sample from the 828-ft chimney outside stack (Sample ID B13-2896). Results were non-detect for ACM.
- Concrete sample from the 828-ft chimney inside stack (Sample ID B13-2897). Results were non-detect from ACM.

ACM Abatement Activities

Identified ACM in the 828-ft chimney (east flue tar coating, east flue tar cover coating, and west flue entrance gasket material) were abated in March 2012 as described in the attached report by Environmental & Safety Solutions (ESS) titled Environmental Asbestos Remediation Asarco Tower submitted to Brandenburg on March 15, 2013.

Regarding Core Sample of Concrete for Constituent Analyses

The objective of the constituent sampling was to identify potential constituent concentrations that could be present in dust generated by concrete crushing during the demolition. As a result, core samples of the full thickness of concrete were collected and crushed to represent this scenario.

Regarding material removed from the walls of the 612-ft chimney

The material has been scraped and rinsed from the walls. The removed material was collected from the base of the chimney. Based on analytical results, this material was determined to be a Category I material. The material has been placed in Bay 14 of the bedding building with other Category I material that has been identified for placement in Cell 4 on site.

Regarding the post-demolition debris sampling

Plan was prepared by Malcolm Pirnie and submitted to the TCEQ on 4/10/13.