

May 20, 2011

Mr. Roberto Puga, Trustee
Texas Custodial Trust
One Pointe Drive, Suite 320
Brea, CA 92821

Project No. 0118148

Subject: April 2011 Dust Monitoring Summary

Dear Mr. Puga:



Environmental Resources Management Southwest, Inc. (ERM) performed dust monitoring activities at the former ASARCO Smelter site in El Paso, Texas during April 2011. Dust data was collected from monitoring locations around the perimeter of the site (Figure 1) when field work with the potential to generate dust was performed on site. With the exception of the following location, data was collected from seven monitoring locations:

- Calavera Location was not monitored after March 1, 2011 when the dust monitor stationed at that location was vandalized such that the equipment was no longer operational. A new unit will be placed at that monitoring location after the recently authorized enclosure is installed to reduce the likelihood of repeated vandalism.

Daily average dust concentrations were below the sentinel value of $43 \mu\text{g}/\text{m}^3$ for all dust monitoring locations during April with the exception of:

- April 4th - The South, North West, North East, and East monitoring locations reported elevated dust data. The elevated data was attributed to dust storms in the area.
- April 14th - The South monitoring location reported elevated dust data. There was no site work performed in the Southern portion of the site, and all other monitors were reading concentrations slightly lower than the sentinel value; therefore the elevated data is attributed to high winds and off-site conditions.
- April 26th - All fence line monitoring locations reported elevated dust data. The elevated data was attributed to high winds and blowing dust in the area.

The on-site meteorological station malfunctioned during the week of April 10th. During that week, elevated dust data was observed on April 14th. Meteorological data obtained from a station approximately three miles from the site was used to evaluate wind speeds and directions for that day.

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A summary of the elevated data is provided in Table 1, and a summary of average daily dust data is provided in Table 2. Meteorological data is provided in Attachment 3.

Sincerely,

Environmental Resources Management Southwest, Inc.

A handwritten signature in cursive script, appearing to read "Amy J. McDonald".

Amy McDonald
ERM Asarco Project Team Member

ALM/hmh
Attachments

cc: MALCOLM Pirnie Asarco Project Team

Figure
Attachment 1

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Environmental Resources Management Southwest, Inc.
15810 Park Ten Place, Suite 300
Houston, Texas 77084-5140
(281) 600-1000

Figure 1
Texas Custodial Trust
Former Asarco Smelter Site
El Paso, Texas

Fence Line Dust Monitoring Locations



For monitoring locations during April 2011.

Tables

Attachment 2

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TABLE 1

April Elevated Perimeter 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 ug/m³.

Date	Location	Wind Direction	Value (ug/m ³)	Comments	Action
4/4/2011	South	Winds generally from the North and East in the morning at 5 to 15 mph, and from the East and South at 5 to 20 mph in the afternoon.	56	Dusty and windy conditions for the entire El Paso and Juarez area. National weather service issued high wind and blowing dust advisory throughout the day.	No field modifications necessary
4/4/2011	North West	Winds generally from the North and East in the morning at 5 to 20 mph, and from the North and South at 1 to 12 mph in the afternoon.	51	Dusty and windy conditions for the entire El Paso and Juarez area. National weather service issued high wind and blowing dust advisory throughout the day.	No field modifications necessary
4/4/2011	North East	Winds generally from the North and East in the morning at 5 to 20 mph, and from the North and South at 1 to 12 mph in the afternoon.	49	Dusty and windy conditions for the entire El Paso and Juarez area. National weather service issued high wind and blowing dust advisory throughout the day.	No field modifications necessary
4/4/2011	East	Winds generally from the North and East in the morning at 5 to 20 mph, and from the North and South at 1 to 12 mph in the afternoon.	51	Dusty and windy conditions for the entire El Paso and Juarez area. National weather service issued high wind and blowing dust advisory throughout the day.	No field modifications necessary
4/14/2011	South	Winds primarily from the West and North West at 6 to 25 mph with higher sustained winds in the afternoon.	49	Dusty and windy conditions for the entire El Paso and Juarez area. No site work was performed at the Southern end of the site. All other monitors were reading concentrations just below the sentinel value indicating that the elevated readings were due to off-site conditions.	No field modifications necessary
4/26/2011	South	Winds primarily from the West and North West at 8 to 38 mph with higher sustained winds in the afternoon.	70	Dusty and windy conditions for the entire El Paso and Juarez area. National weather service issued high wind and blowing dust advisory throughout the day.	No field modifications necessary
4/26/2011	West	Winds primarily from the West and North West at 8 to 38 mph with higher sustained winds in the afternoon.	52	Dusty and windy conditions for the entire El Paso and Juarez area. National weather service issued high wind and blowing dust advisory throughout the day.	No field modifications necessary
4/26/2011	North West	Winds primarily from the West and North West at 8 to 38 mph with higher sustained winds in the afternoon.	84	Dusty and windy conditions for the entire El Paso and Juarez area. National weather service issued high wind and blowing dust advisory throughout the day.	No field modifications necessary
4/26/2011	North	Winds primarily from the West and North West at 8 to 38 mph with higher sustained winds in the afternoon.	70	Dusty and windy conditions for the entire El Paso and Juarez area. National weather service issued high wind and blowing dust advisory throughout the day.	No field modifications necessary
4/26/2011	North East	Winds primarily from the West and North West at 8 to 38 mph with higher sustained winds in the afternoon.	78	Dusty and windy conditions for the entire El Paso and Juarez area. National weather service issued high wind and blowing dust advisory throughout the day.	No field modifications necessary
4/26/2011	East	Winds primarily from the West and North West at 8 to 38 mph with higher sustained winds in the afternoon.	58	Dusty and windy conditions for the entire El Paso and Juarez area. National weather service issued high wind and blowing dust advisory throughout the day.	No field modifications necessary

TABLE 2
April Fence Line Dust Monitoring Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Week ending April 2nd							
Date						Friday, April 01, 2011	Saturday, April 02, 2011
Location						Average Heading (ug/m ³)	Average Heading (ug/m ³)
South						16	
West						13	
North West						12	
North						13	
North East						8	
East						14	
Calavera							

Week ending April 9th							
Date	Sunday, April 03, 2011	Monday, April 04, 2011	Tuesday, April 05, 2011	Wednesday, April 06, 2011	Thursday, April 07, 2011	Friday, April 08, 2011	Saturday, April 09, 2011
Location	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)
South		56	26	11	30	9	
West		35	25	12	24	11	
North West		51	22	10	22	12	
North		41	28	16	26	11	
North East		49	24	10	27	12	
East		51	25	11	23	12	
Calavera							

Week ending April 16th							
Date	Sunday, April 10, 2011	Monday, April 11, 2011	Tuesday, April 12, 2011	Wednesday, April 13, 2011	Thursday, April 14, 2011	Friday, April 15, 2011	Saturday, April 16, 2011
Location	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)
South		10	28	15	49	33	
West		10	22	12	40	25	
North West		10	31	11	39	34	
North		9	27	23	34	29	
North East		10	29	15	42	33	
East		11	26	15	38	34	
Calavera							

Week ending April 23rd							
Date	Sunday, April 17, 2011	Monday, April 18, 2011	Tuesday, April 19, 2011	Wednesday, April 20, 2011	Thursday, April 21, 2011	Friday, April 22, 2011	Saturday, April 23, 2011
Location	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)
South		30	19	10	21	13	
West		25	14	11	21	12	
North West		27	16	15	21	10	
North		32	19	18	27	17	
North East		27	16	16	20	11	
East		27	15	14	23	10	
Calavera							

Week ending April 30th							
Date	Sunday, April 24, 2011	Monday, April 25, 2011	Tuesday, April 26, 2011	Wednesday, April 27, 2011	Thursday, April 28, 2011	Friday, April 29, 2011	Saturday, April 30, 2011
Location	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)	Average Heading (ug/m ³)
South		25	70	11	13	28	
West		18	52	10	Malfunction	Malfunction	
North West		18	84	12	15		
North		21	70	10	14	39	
North East		18	78	9	14	31	
East		18	58	13	9	27	
Calavera							

NOTES:

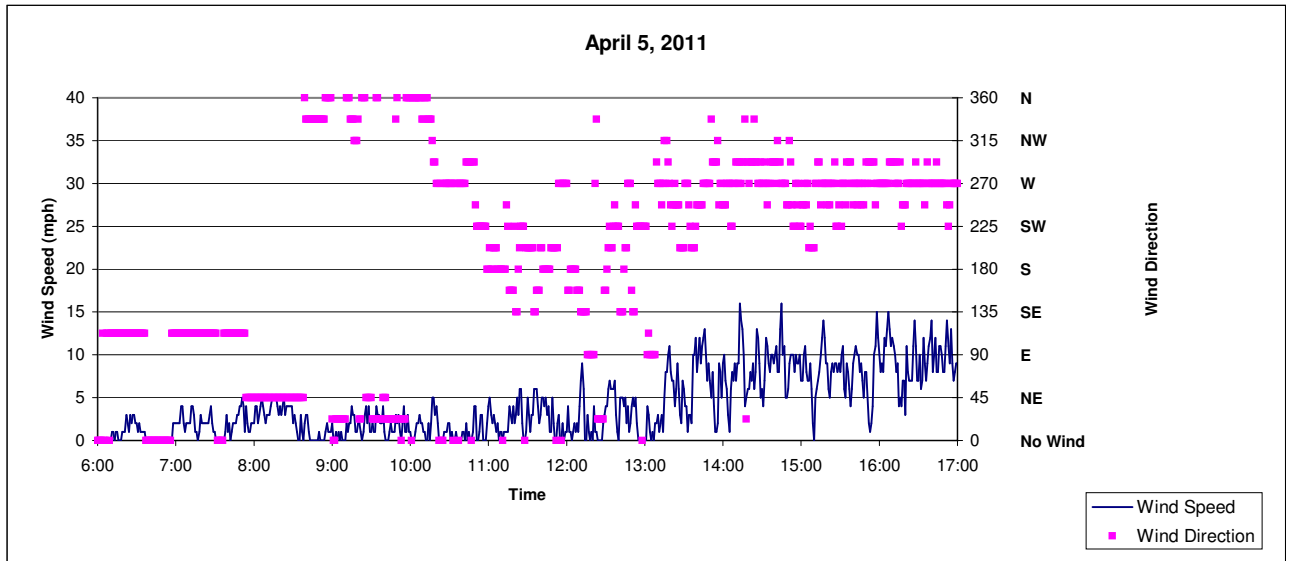
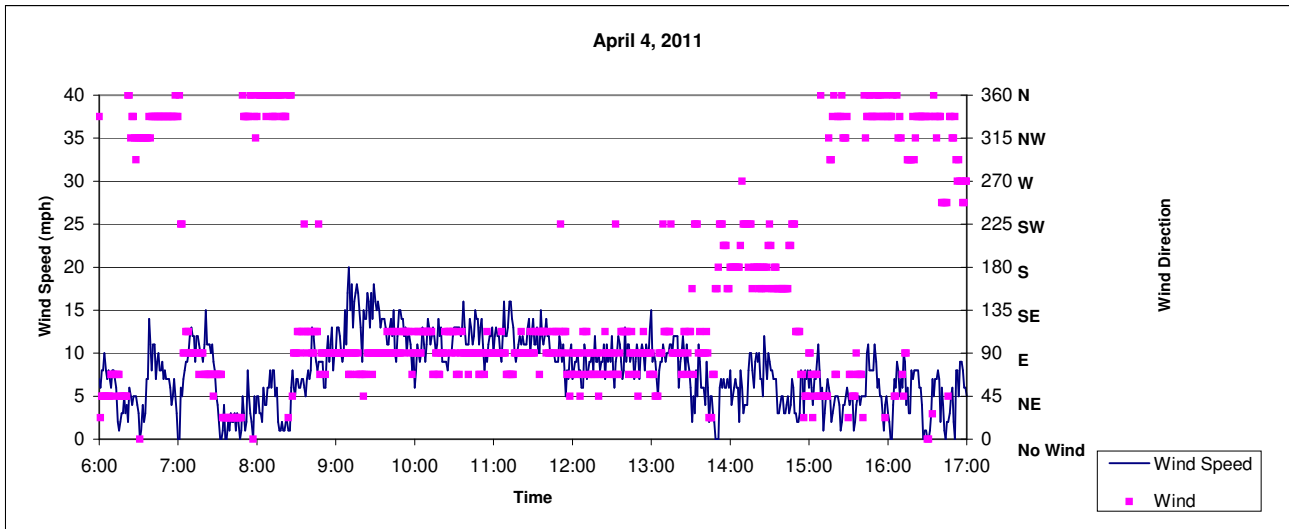
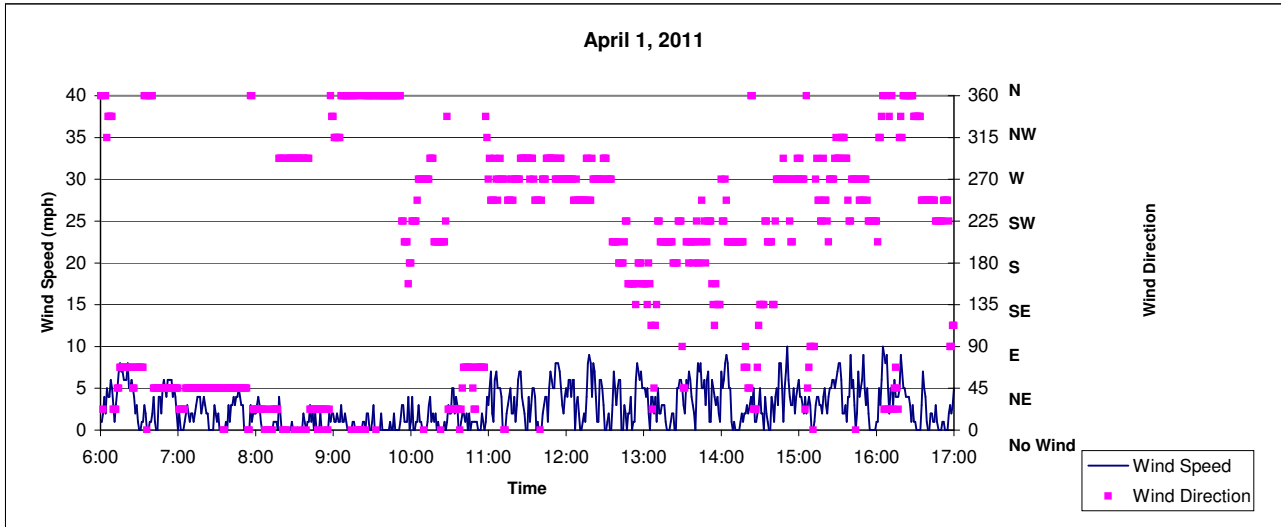
1. Readings indicate PM₁₀ dust based on direct read monitoring from TSI DustTrack II equipment.
2. Gray cell indicates that a dust monitor was not stationed at that location.
3. Blue cell indicates that the meter malfunctioned at that location.

Graphs
Attachment 3

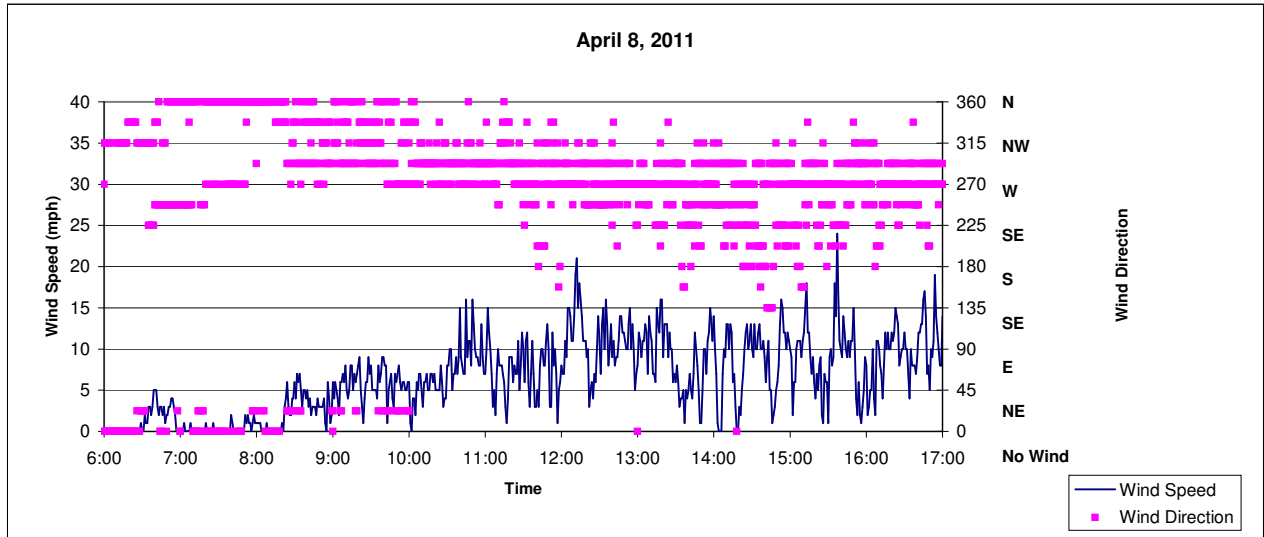
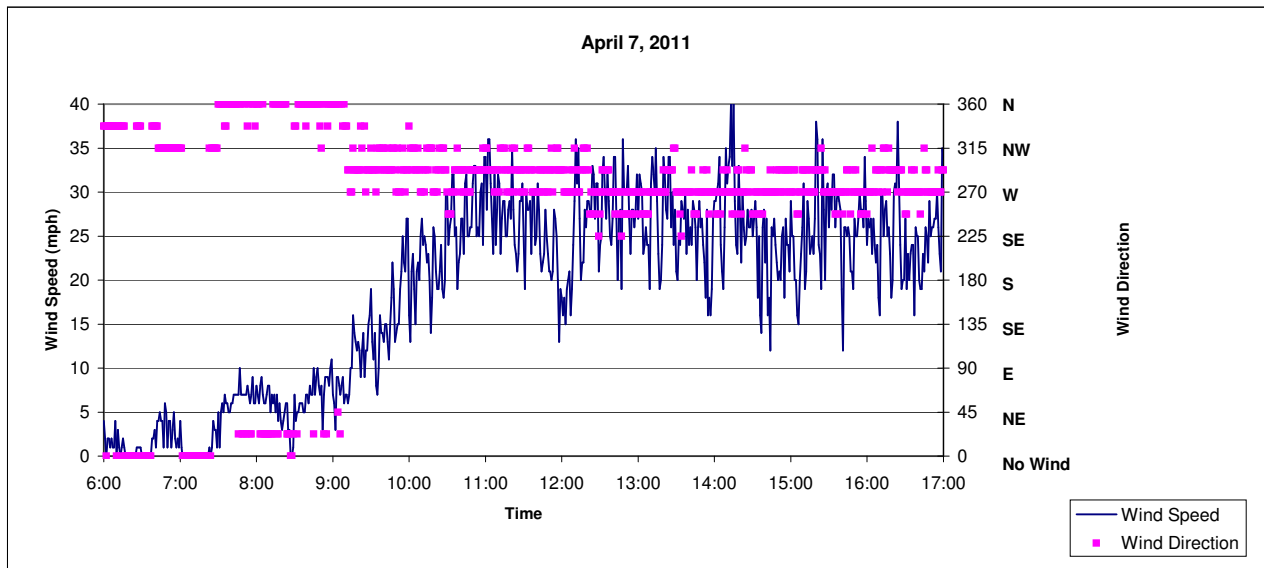
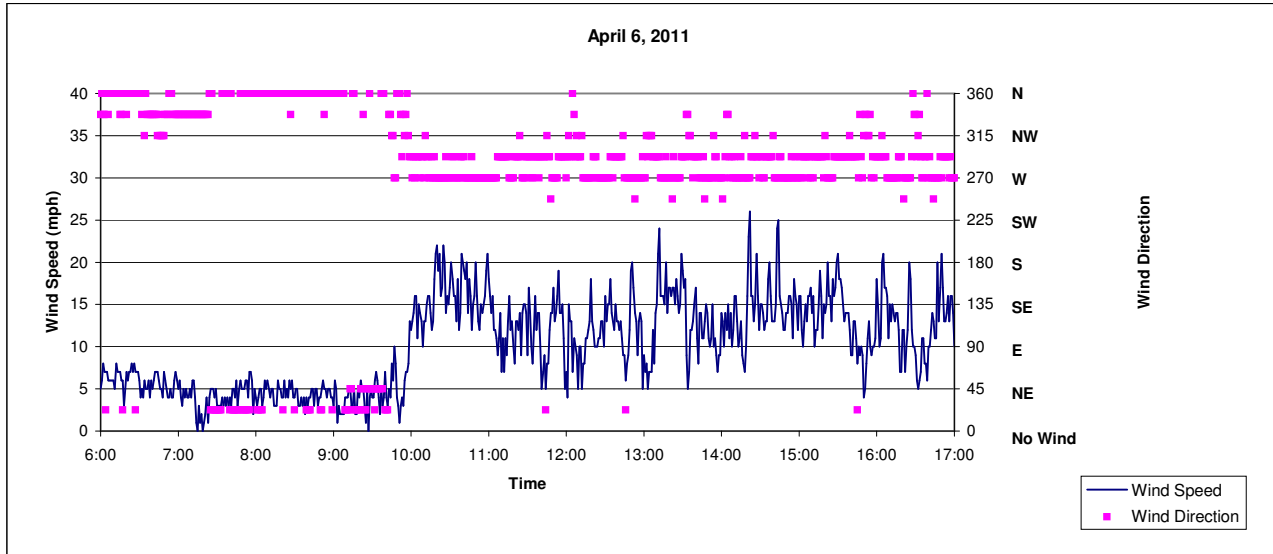
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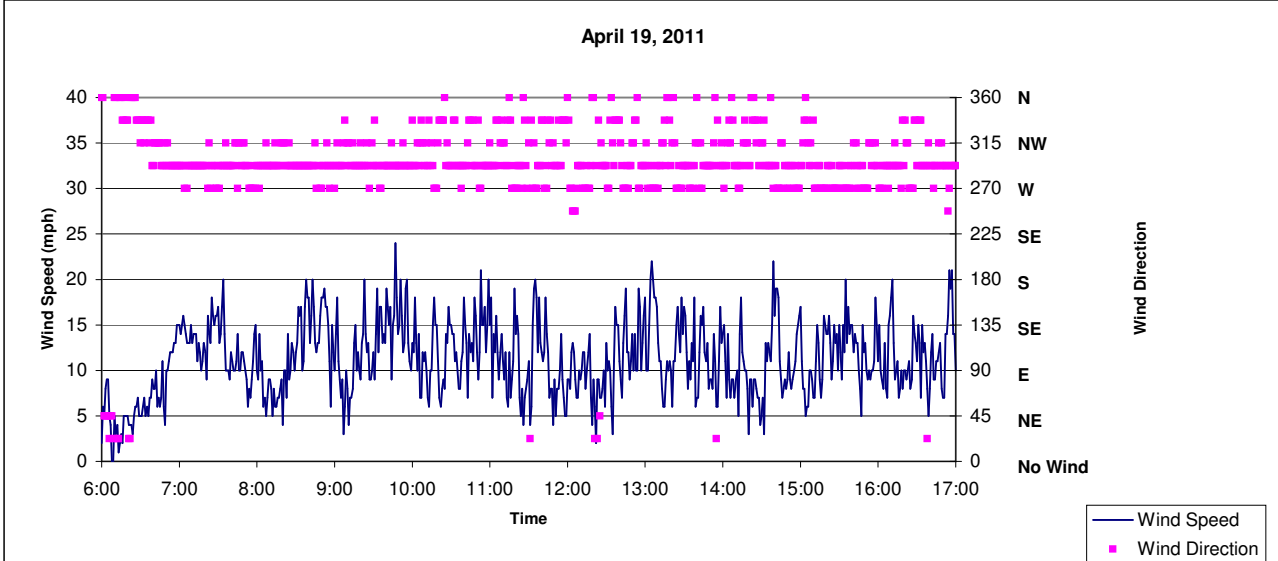
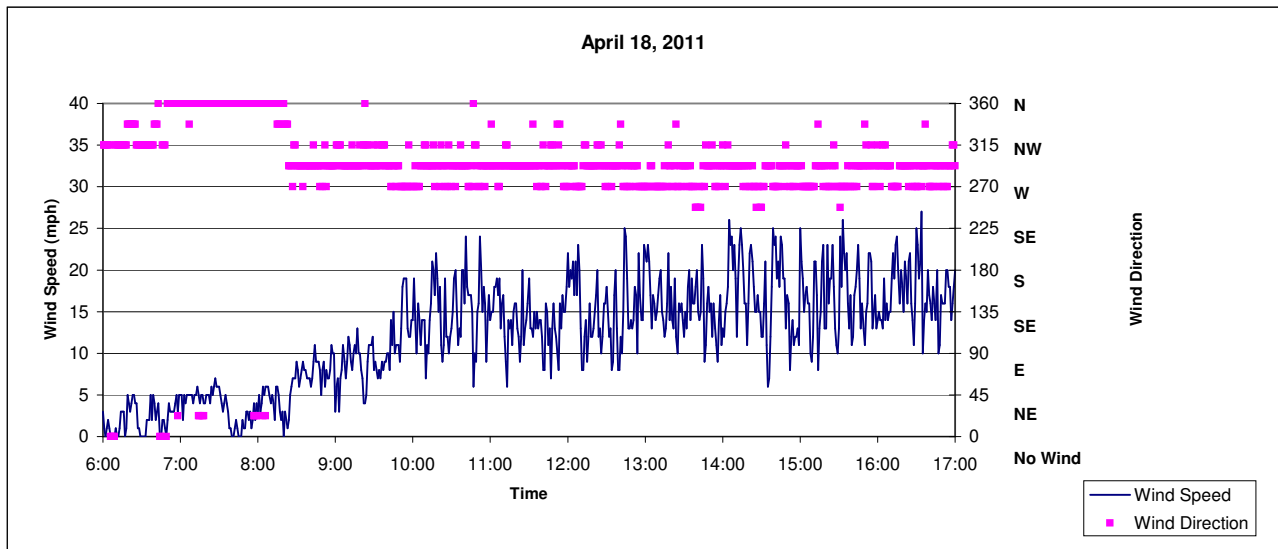
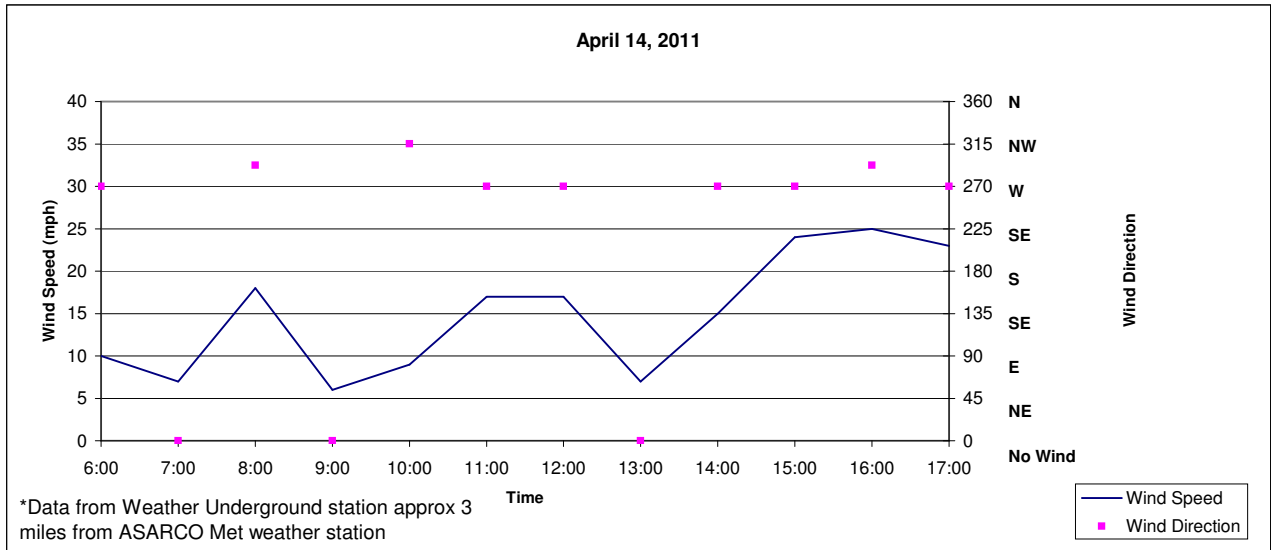
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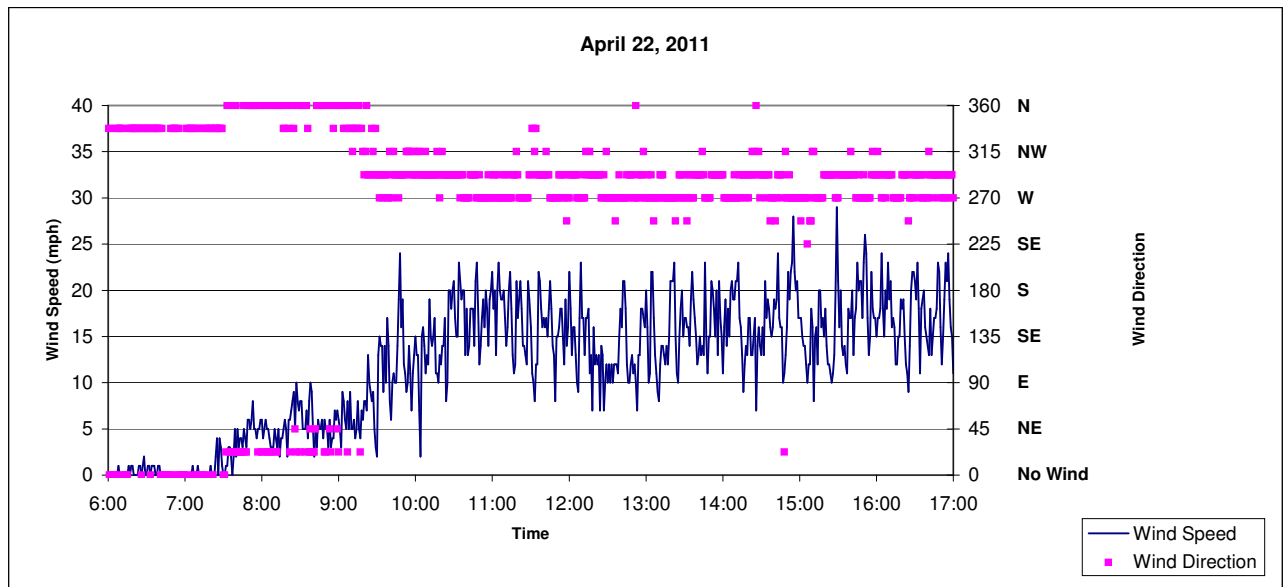
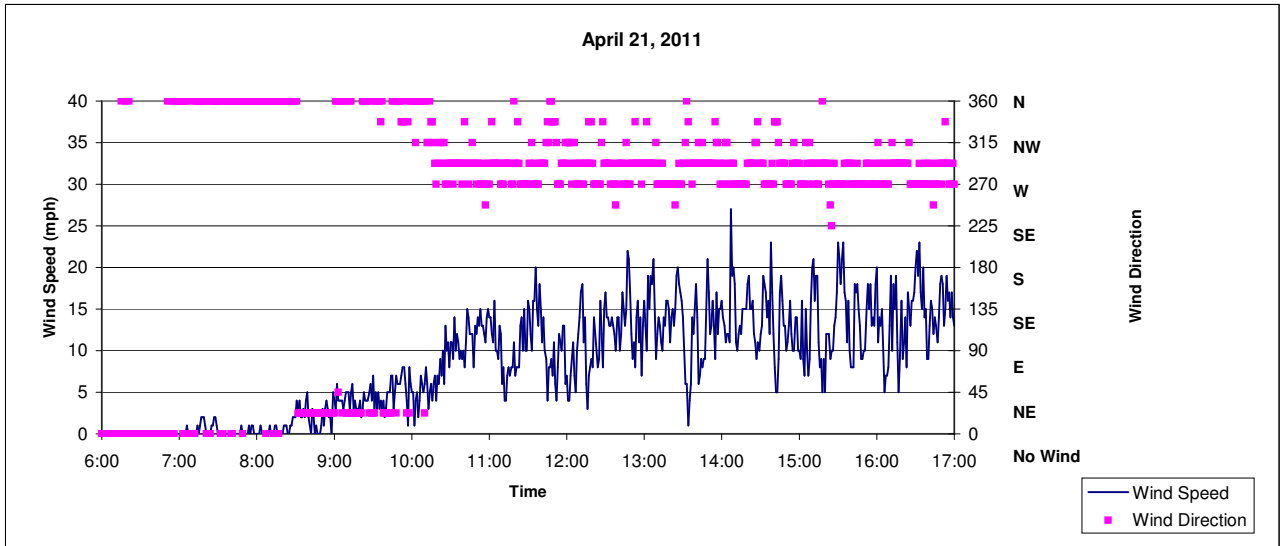
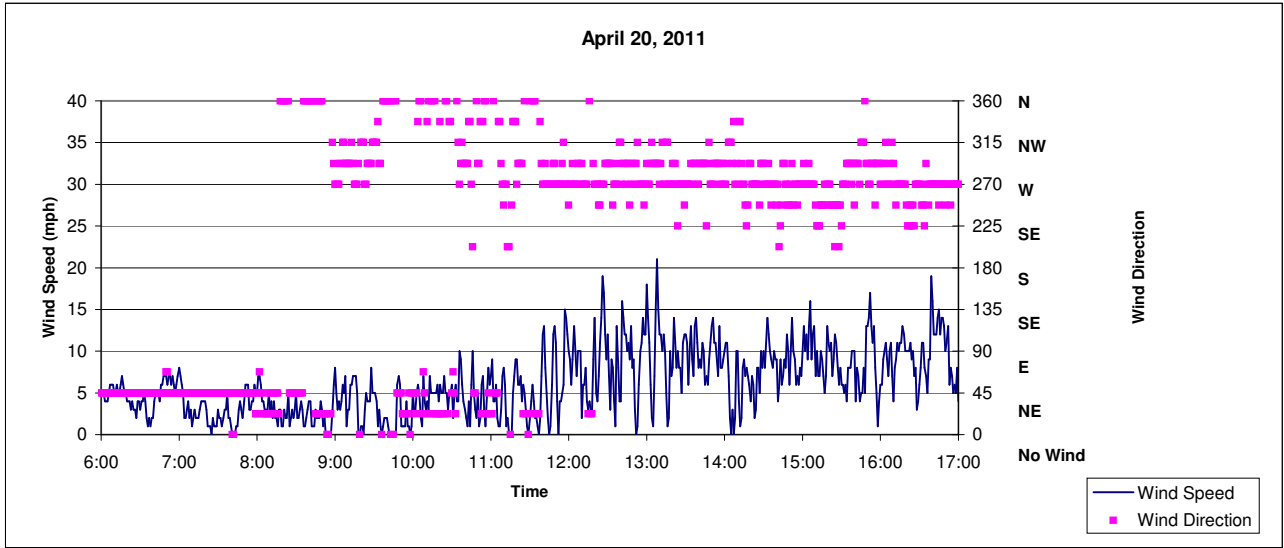
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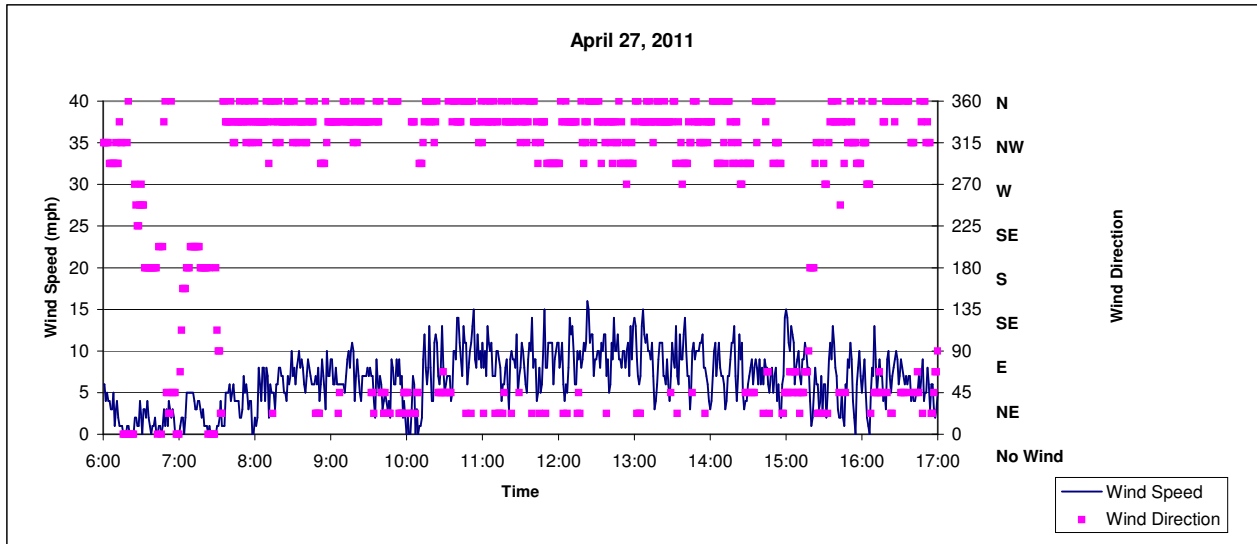
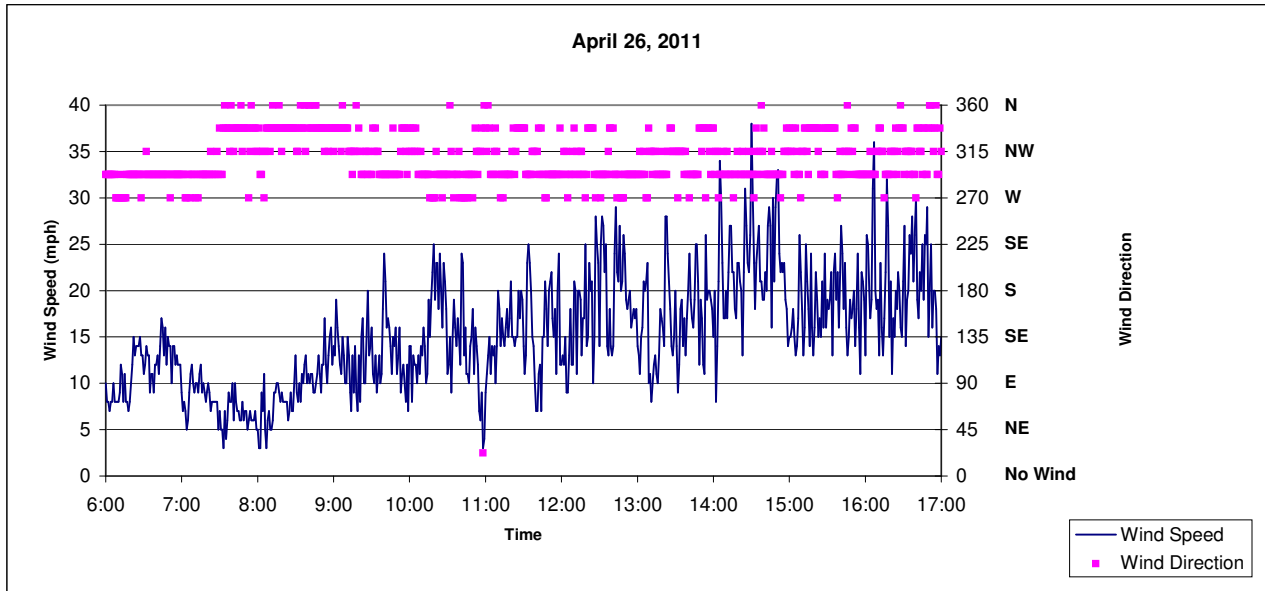
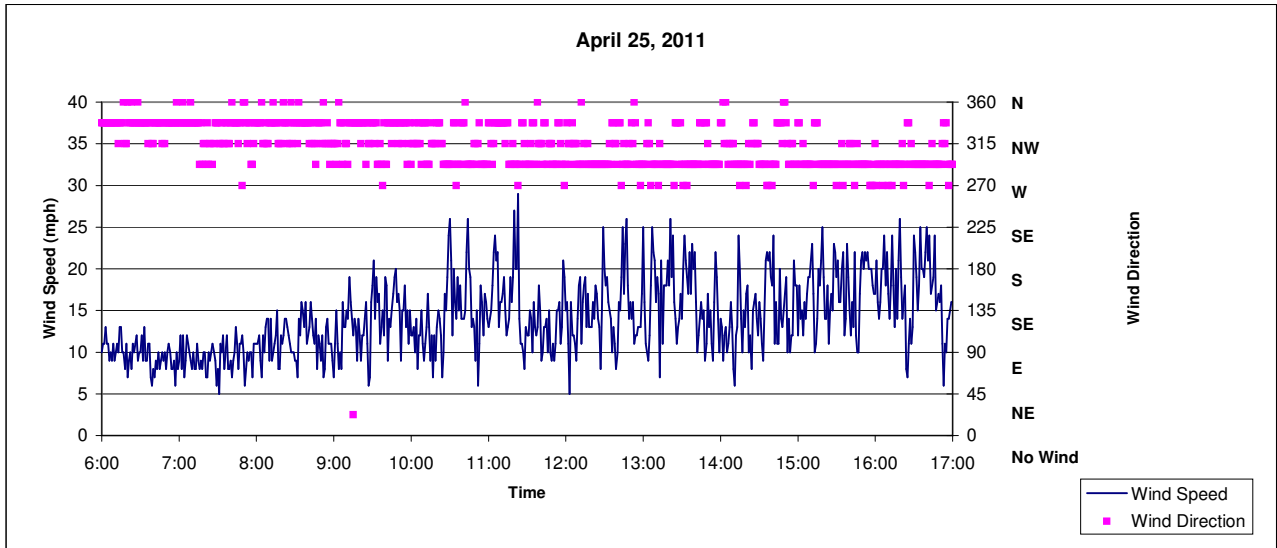
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