

July 22, 2011

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

Project No. 0118148

Subject: June 2011 Dust Monitoring Summary

Dear Mr. Puga:



Environmental Resources Management (ERM) performed dust monitoring activities at the former ASARCO Smelter site in El Paso, Texas during June 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 was placed at the Calavera monitoring location with surrounding security fencing and began operating on June 7, 2011.

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

- June 1st - The North West monitoring location reported elevated dust data. Dusty conditions developed in the El Paso and Juarez area in the afternoon. The South monitoring location was upwind of site activities and taken as the background dust reading. Subtracting background dust from the average dust reading for the North West location results in the actual dust generated on site to be 15 $\mu\text{g}/\text{m}^3$ for the North West location.
- June 2nd – The North East monitoring location reported elevated dust data. The North West monitor location was upwind of site activities and taken as the background dust reading. Background dust was slightly below the sentinel value. Subtracting background dust from the average dust reading for the North East location results in the actual dust generated on site to be 7 $\mu\text{g}/\text{m}^3$ for the North East location.
- June 7th – All perimeter monitoring stations, including monitors upwind of site activities and monitors with no demolition activities near their proximity, recorded values above the sentinel value which indicate that elevated readings were due to off-site conditions.

- June 8th – The North and North East monitoring locations reported elevated dust data. Dusty and hazy conditions developed in the El Paso and Juarez area in the afternoon. The South location, which was upwind of site activities, is taken as background dust reading. Subtracting background dust from the average dust reading for the North location and North East location results in the actual dust generated on site to be 8 and 13 ug/m³ for the North location and North East location.
- June 13th – The North East monitoring location reported elevated dust data. On June 13th, 2011, the National Weather Service issued a Special Weather Statement explaining that poor air quality across much of the Southwest was due to wildfire smoke and would continue throughout the week. Hazy conditions were observed in the El Paso and Juarez area. In addition the facilities across the river were also generating dust from their operations that was migrating east towards the site. The Calavera location, which was upwind of site activities, is taken as background dust reading. Subtracting background dust from the average dust reading for the North East location results in the actual dust generated on site to be 18 ug/m³ for the North East location.
- June 14th - The North East monitoring location reported elevated dust data. On June 14th, 2011, the National Weather Service issued a Special Weather Statement explaining that poor air quality across much of the Southwest was due to wildfire smoke and would continue throughout the week. Hazy conditions were observed in the El Paso and Juarez area. The Calavera location, which was upwind of site activities, is taken as background dust reading. Subtracting background dust from the average dust reading for the North East location results in the actual dust generated on site to be 13 ug/m³ for the North East location.
- June 24th – The West monitoring location reported elevated dust data. The North West location, which was upwind of site activities, is taken as background dust reading. Subtracting background dust from the average dust reading for the West location results in the actual dust generated on site to be 24 ug/m³ for the West location.

A summary of the elevated dust data is provided in Table 1, and daily data summary sheets are provided in Table 2. Meteorological data is provided in Attachment 1.

Sincerely,

Environmental Resources Management



Amy McDonald
ERM Asarco Project Team Member

AM/hmh

Attachments

cc: MALCOLM Pirnie Asarco Project Team

Figure

July 22, 2011
Project No. 0118148

Environmental Resources Management
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 June 2011.

Tables

July 22, 2011
Project No. 0118148

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

TABLE 1

June Fence Line Dust Monitor Elevated 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
6/1/2011	North West	Low to moderate winds throughout the day with 0 to 20 mph winds predominately out of the south and south east.	52	Dusty conditions developed in the El Paso and Juarez area in the afternoon. The South monitoring location was upwind of site activities and taken as the background dust reading. Subtracting background dust from the average dust reading for the North West location results in the actual dust generated on site to be 15 ug/m ³ for the North West location.	No field modifications necessary
6/2/2011	North East	Low to moderate winds throughout the day with 0 to 15 mph winds shifting from the south east to the north west.	47	The North West monitor location was upwind of site activities and taken as the background dust reading. Background dust was slightly below the sentinel value. Subtracting background dust from the average dust reading for the North East location results in the actual dust generated on site to be 7 ug/m ³ for the North East location.	No field modifications necessary
6/7/2011	All	Low winds in the morning between 0 to 8 mph predominately out of the North. Low to moderate winds in the afternoon between 2 to 22 mph predominately out of the west and north west.	47-72	All perimeter monitoring stations, including monitors upwind of site activities and monitors with no demolition activities near their proximity, recorded values above the sentinel value which indicate that elevated readings were due to off-site conditions.	No field modifications necessary
6/8/2011	North	Low winds in the early morning between 0 to 10 mph out of the north and north east. Low to moderate winds throughout the rest of the day between 0 to 20 mph predominately out of the west and south west.	45	Dusty and hazy conditions developed in the El Paso and Juarez area in the afternoon. The South location, which was upwind of site activities, is taken as background dust reading. Subtracting background dust from the average dust reading for the North location and North East location results in the actual dust generated on site to be 8 and 13 ug/m ³ for the North location and North East location.	No field modifications necessary
6/8/2011	North East	Low winds in the early morning between 0 to 10 mph out of the north and north east. Low to moderate winds throughout the rest of the day between 0 to 20 mph predominately out of the west and south west.	50	Dusty and hazy conditions developed in the El Paso and Juarez area in the afternoon. The South location, which was upwind of site activities, is taken as background dust reading. Subtracting background dust from the average dust reading for the North location and North East location results in the actual dust generated on site to be 8 and 13 ug/m ³ for the North location and North East location.	No field modifications necessary

TABLE 1 (Cont'd)

June Fence Line Dust Monitor Elevated 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
6/13/2011	North East	Low to moderate winds in the morning between 0 to 12 mph predominately out of the north and north east. Low to moderate winds throughout the afternoon between 0 to 21 mph and predominately out of the west and north west.	47	On June 13th, 2011, the National Weather Service issued a Special Weather Statement explaining that poor air quality across much of the Southwest was due to wildfire smoke and would continue throughout the week. Hazy conditions were observed in the El Paso and Juarez area. In addition the facilities across the river were also generating dust from their operations that was migrating east towards the site. The Calavera location, which was upwind of site activities, is taken as background dust reading. Subtracting background dust from the average dust reading for the North East location results in the actual dust generated on site to be 18 ug/m3 for the North East location.	No field modifications necessary
6/14/2011	North East	Low to moderate winds in the morning between 0 to 12 mph predominately out of the north and north east. Low to high winds throughout the afternoon between 0 to 29 mph and predominately out of the west and north west.	52	On June 14th, 2011, the National Weather Service issued a Special Weather Statement explaining that poor air quality across much of the Southwest was due to wildfire smoke and would continue throughout the week. Hazy conditions were observed in the El Paso and Juarez area. The Calavera location, which was upwind of site activities, is taken as background dust reading. Subtracting background dust from the average dust reading for the North East location results in the actual dust generated on site to be 13 ug/m3 for the North East location.	No field modifications necessary
6/24/2011	West	Low winds in the early morning between 0 to 10 mph predominately out of the north and north east. Low to moderate winds throughout the rest of the day between 0 to 21 mph predominately out of the north and north west.	50	The North West location, which was upwind of site activities, is taken as background dust reading. Subtracting background dust from the average dust reading for the West location results in the actual dust generated on site to be 24 ug/m3 for the West location.	No field modifications necessary

TABLE 2

June Fence Line Dust Monitoring Data Daily Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Week of May 30th					
Date	Monday, May 30, 2011	Tuesday, May 31, 2011	Wednesday, June 01, 2011	Thursday, June 02, 2011	Friday, June 03, 2011
Location			Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)
South			37	43	39
West			34	39	36
North West			52	40	38
North			39	41	36
North East			41	47	42
East			36	42	42
Calavera					

Week of June 6th					
Date	Monday, June 06, 2011	Tuesday, June 07, 2011	Wednesday, June 08, 2011	Thursday, June 09, 2011	Friday, June 10, 2011
Location	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)
South	24	56	37	22	17
West	22	51	37	22	17
North West	31	47	33	22	16
North	22	55	45	24	18
North East	29	72	50	31	24
East	23	58	37	24	19
Calavera		48	38	22	16

Week of June 13th					
Date	Monday, June 13, 2011	Tuesday, June 14, 2011	Wednesday, June 15, 2011	Thursday, June 16, 2011	Friday, June 17, 2011
Location	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)
South	29	37	15	31	26
West	33	35	15	30	26
North West	28	33	11	27	22
North	29	41	13	31	25
North East	47	52	17	41	33
East	30	38	14	29	26
Calavera	29	39	14	26	25

Week of June 20th					
Date	Monday, June 20, 2011	Tuesday, June 21, 2011	Wednesday, June 22, 2011	Thursday, June 23, 2011	Friday, June 24, 2011
Location	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)
South	18	11	29	22	28
West	16	11	34	19	50
North West	13	11	36	23	26
North	13	9	33	21	24
North East	22	15	35	24	35
East	21	12	29	19	29
Calavera	15	10	31	20	27

Week of June 27th					
Date	Monday, June 27, 2011	Tuesday, June 28, 2011	Wednesday, June 29, 2011	Thursday, June 30, 2011	Friday, July 01, 2011
Location	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)	
South	13	33	20	20	
West	9	25	17	17	
North West	22	26	26	23	
North	13	23	17	20	
North East	14	30	19	20	
East	10	24	16	18	
Calavera	9	23	14	17	

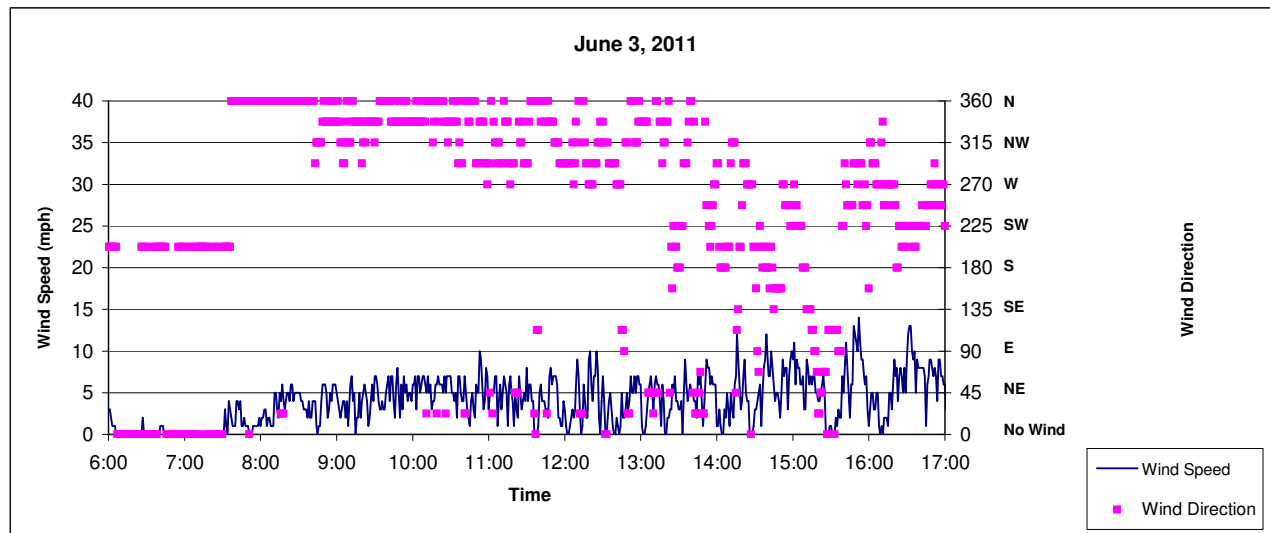
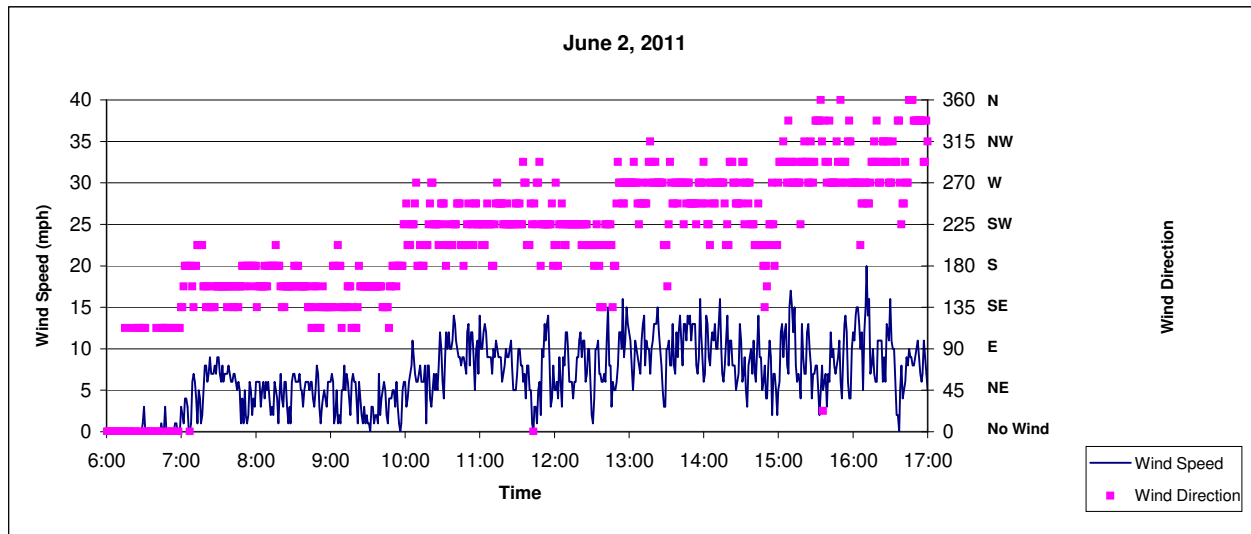
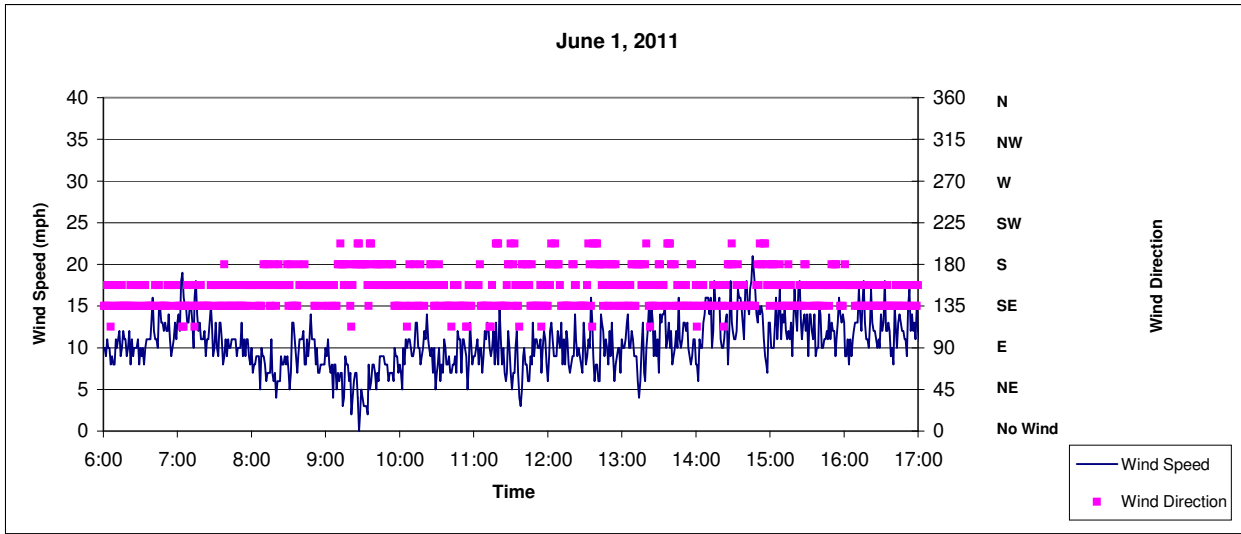
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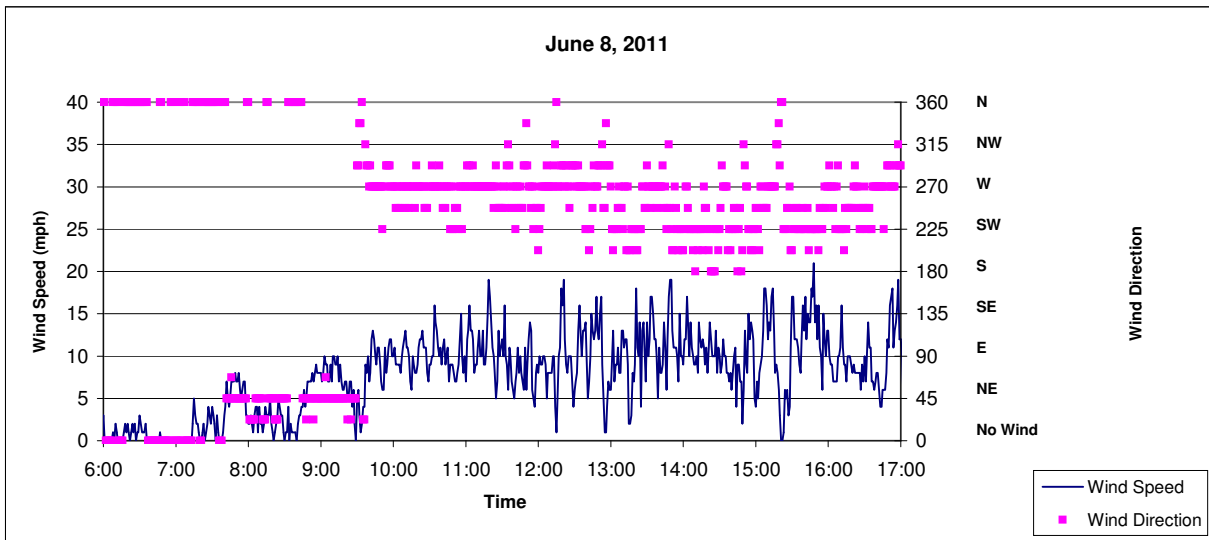
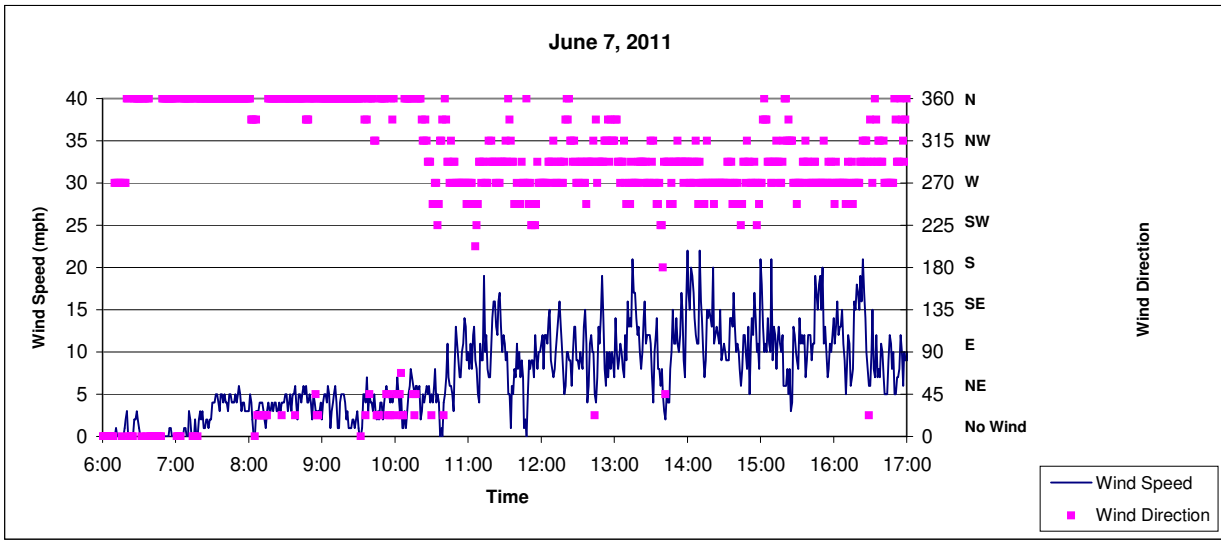
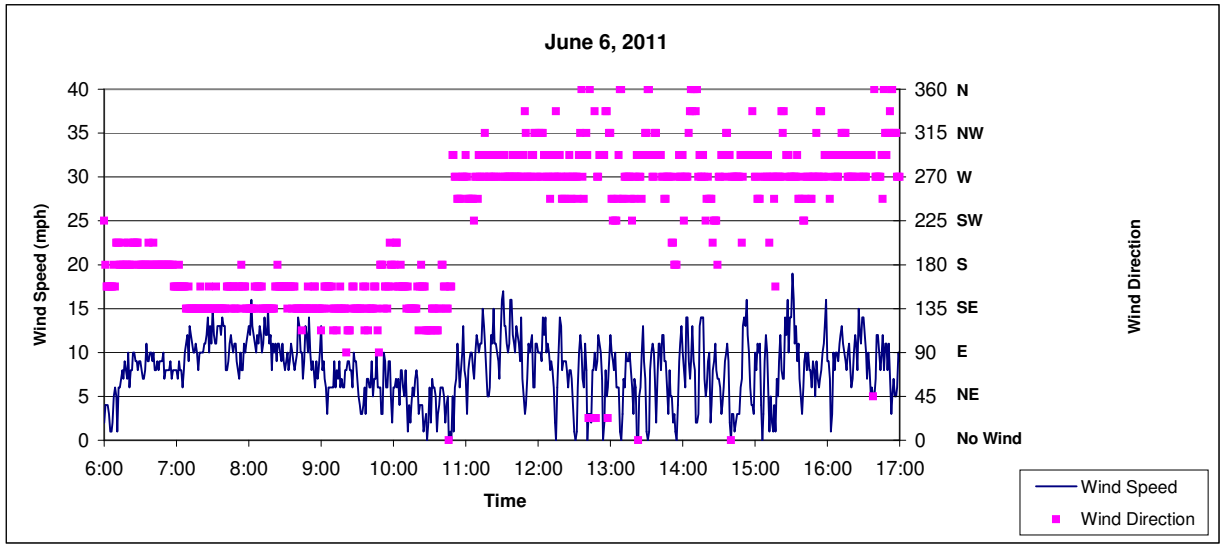
- Active work days during the month of June are summarized in this table.
1. Readings indicate PM₁₀ dust based on direct read monitoring from TSI DustTrack II equipment.
 2. Gray cell indicates that a dust monitor was not stationed at that location.
 3. Blue cell indicates that the meter malfunctioned at that location.

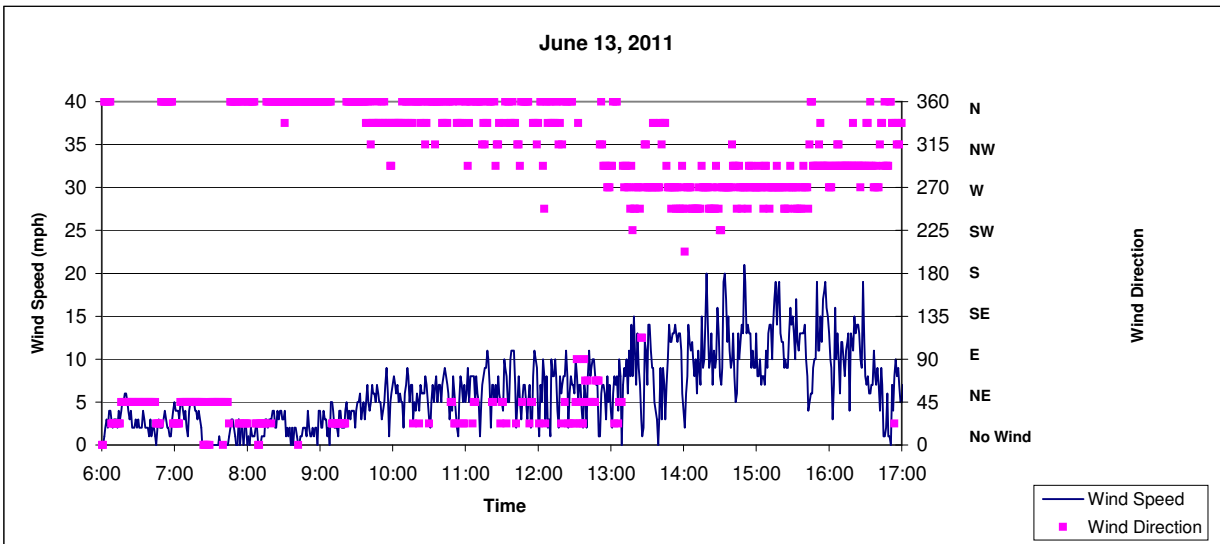
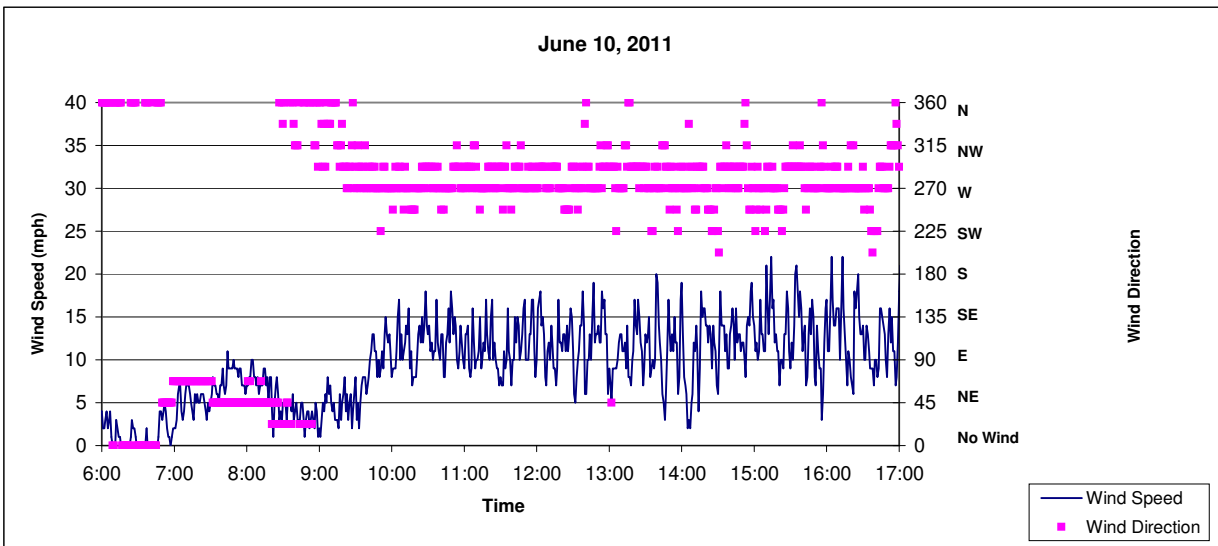
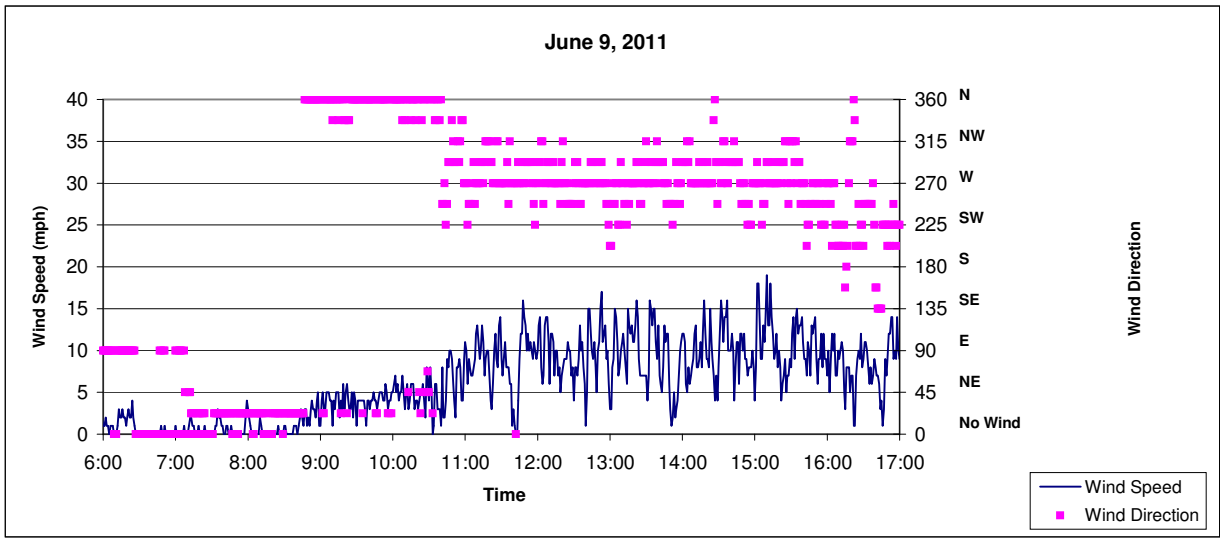
Meteorological Summary Graphs
Attachment 1

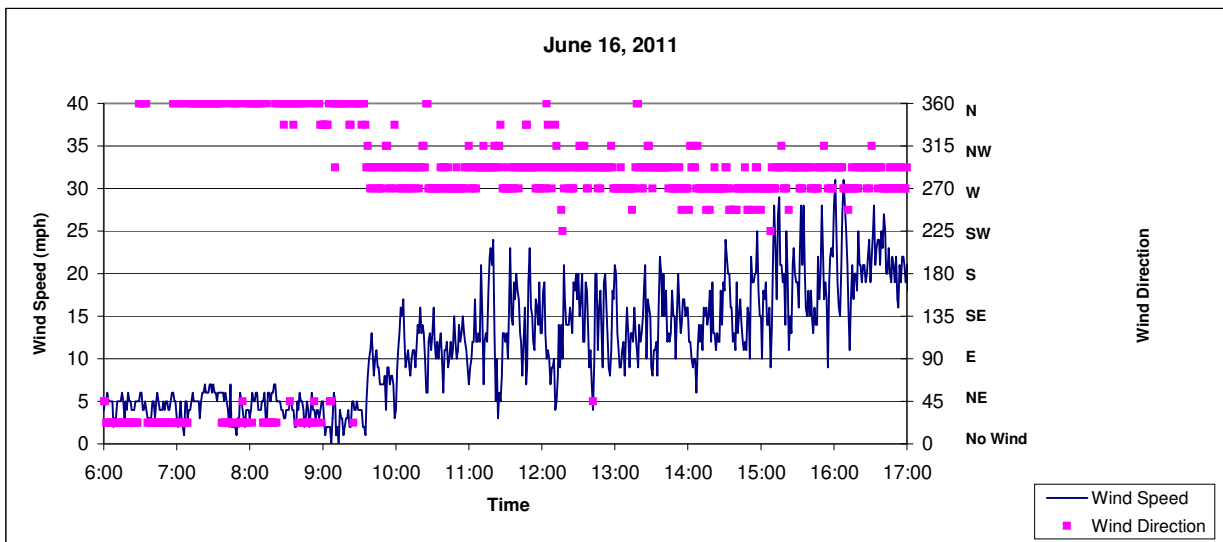
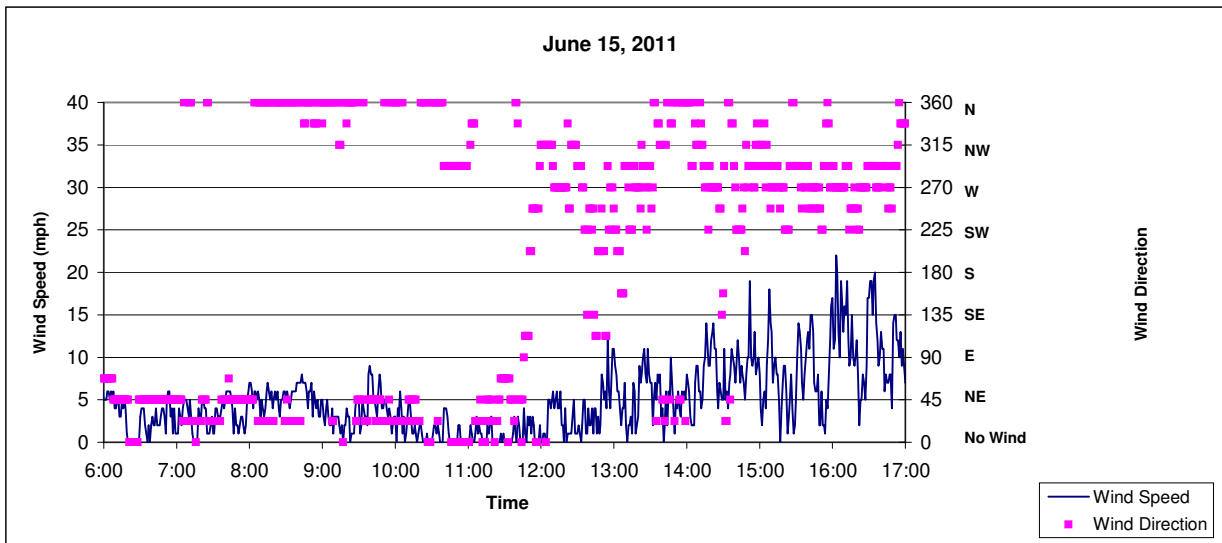
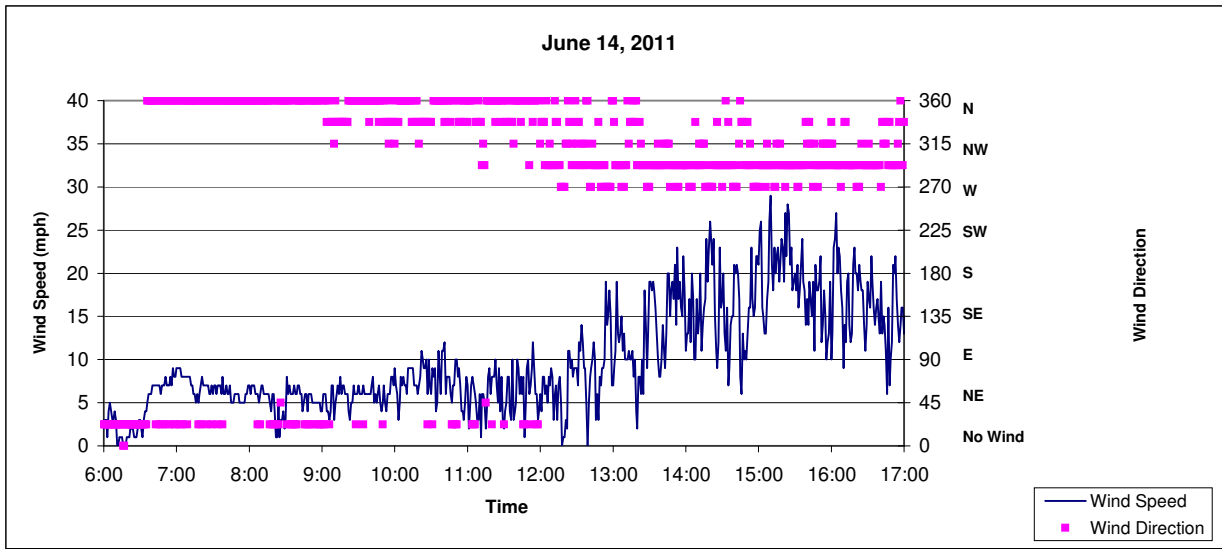
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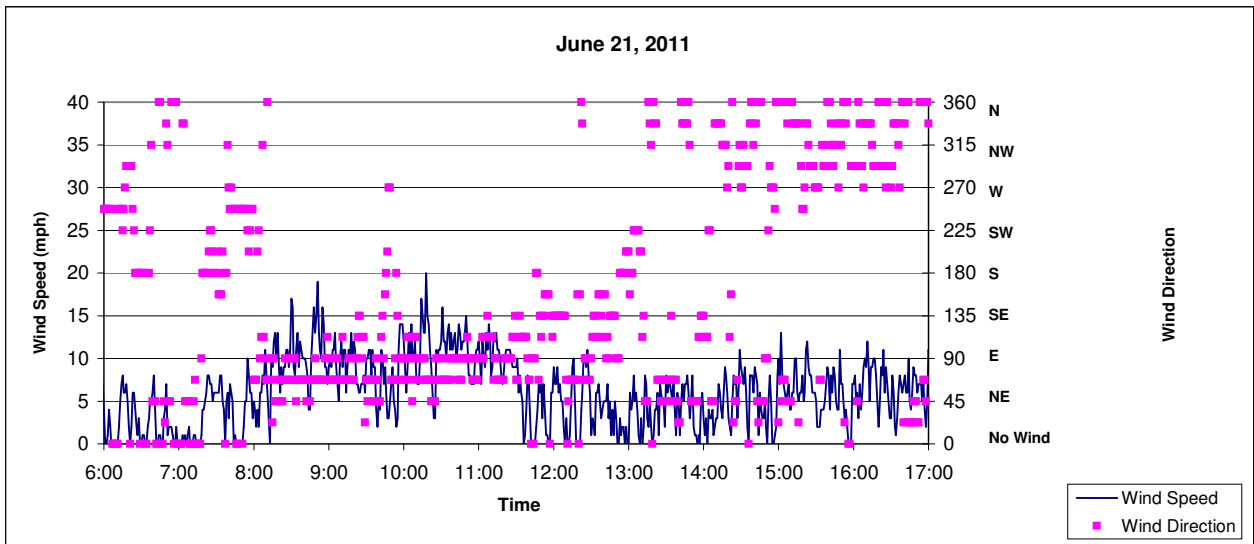
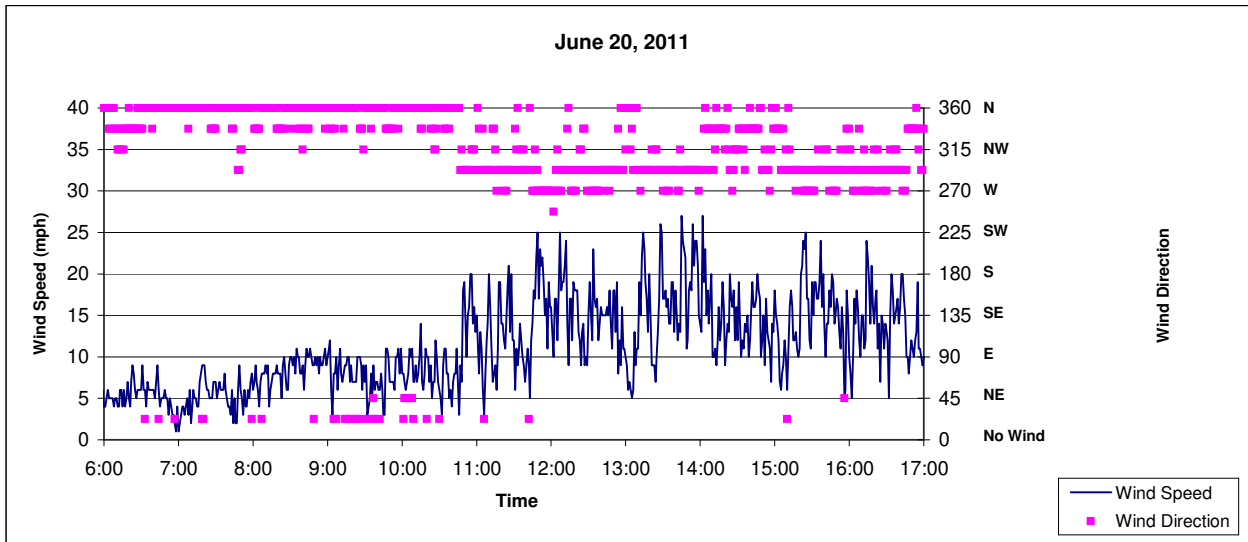
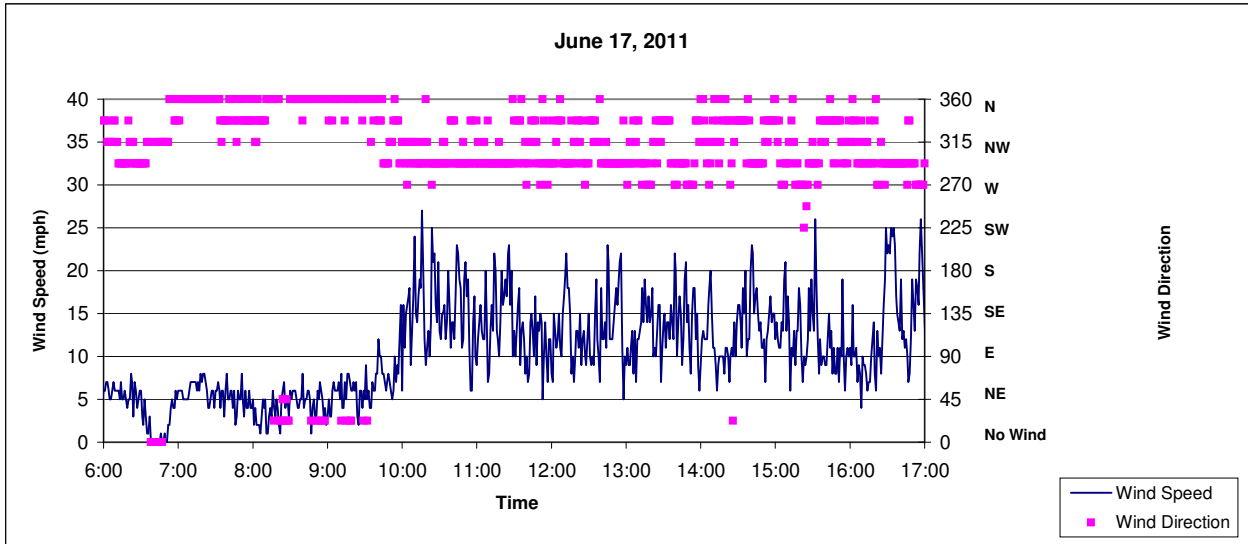
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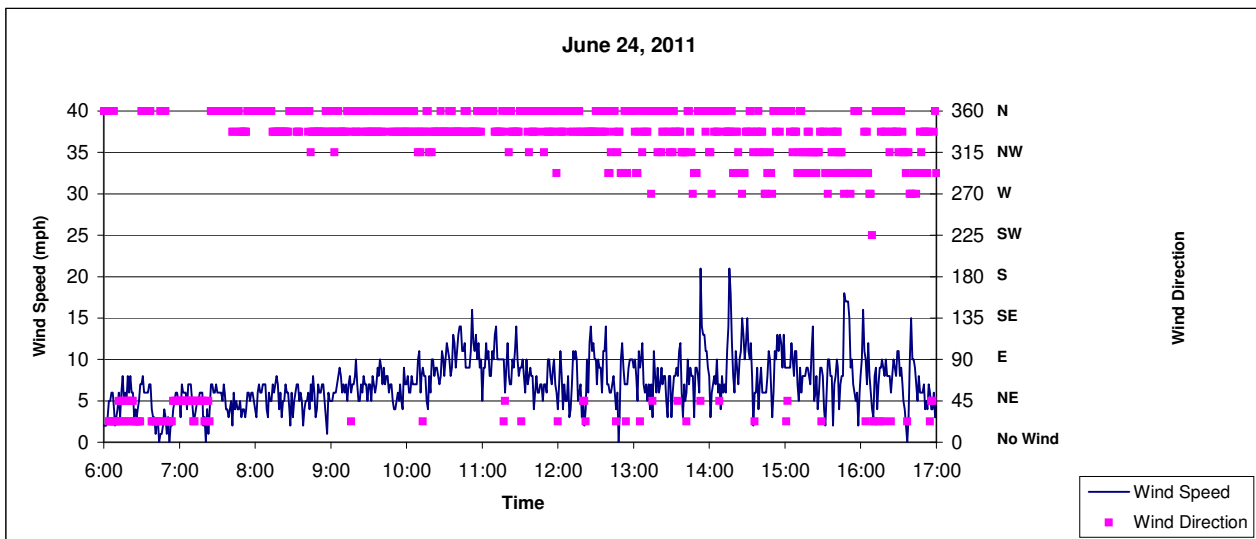
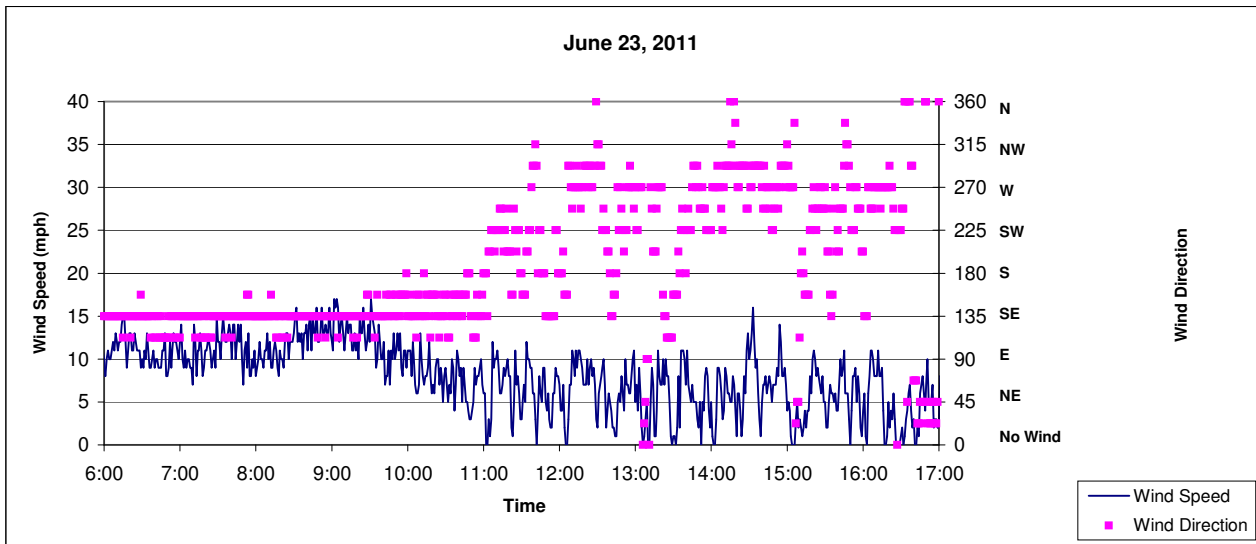
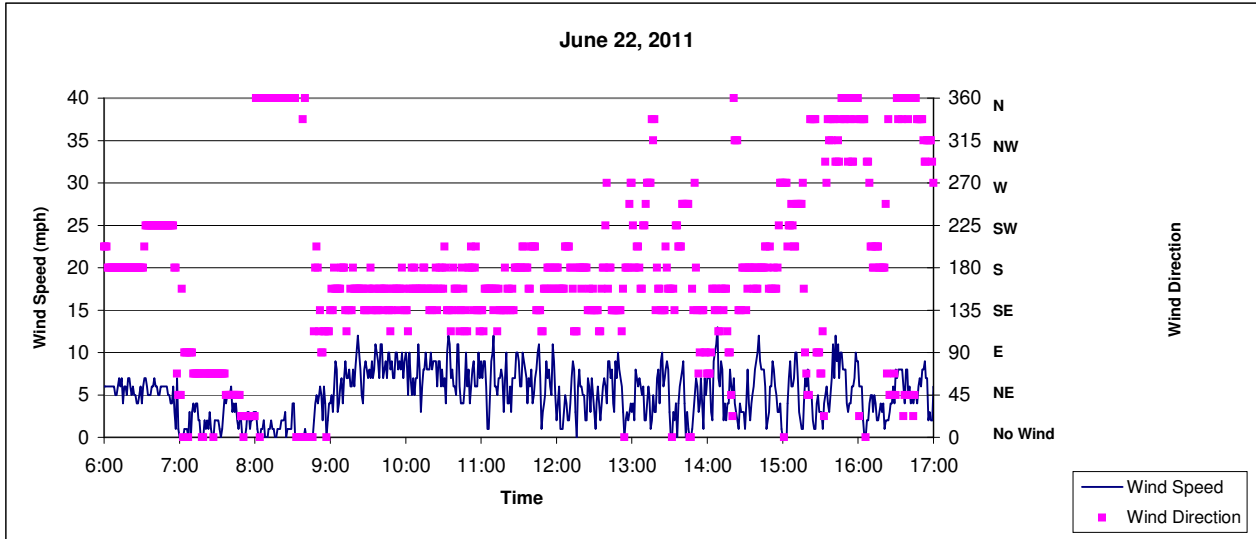


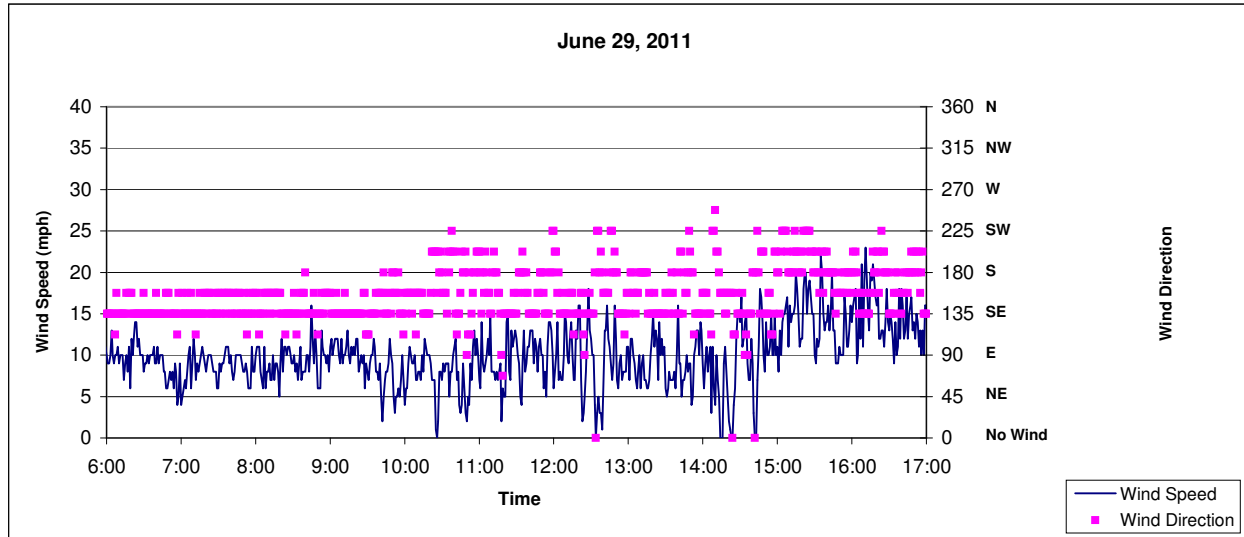
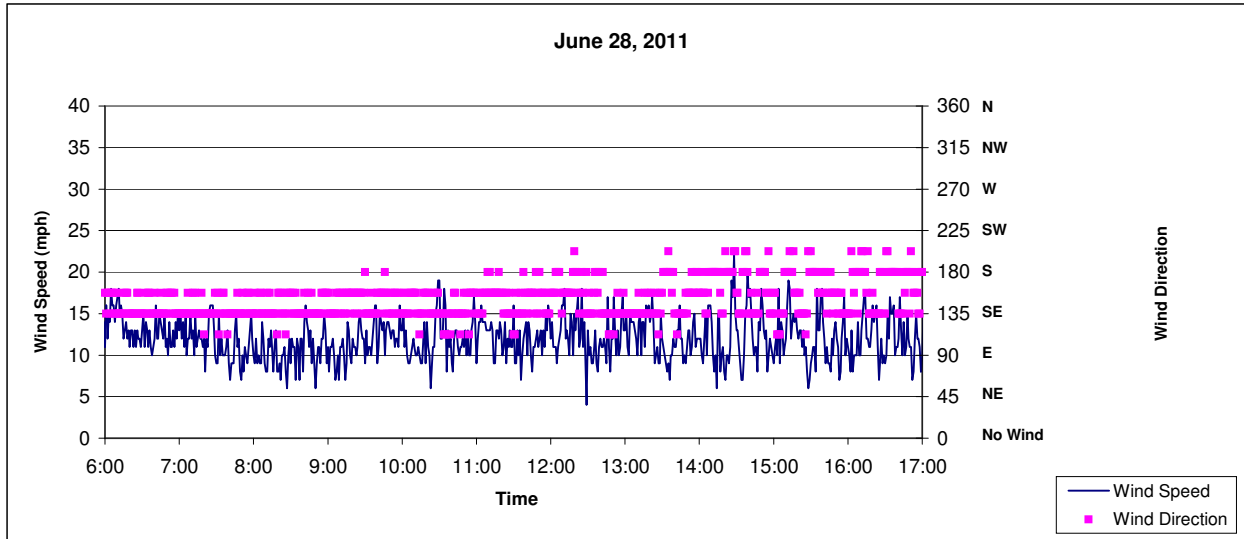
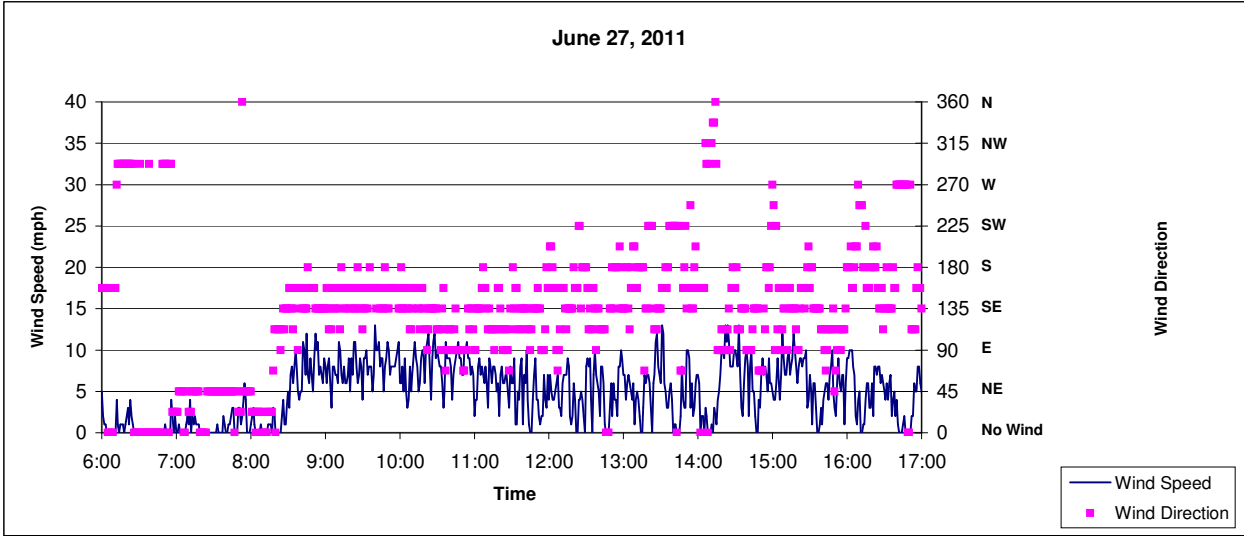












June 30, 2011

