

October 18, 2011

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

Project No. 0118148

15810 Park Ten Place
Suite 300
Houston, Texas 77084-5140
(281) 600-1000
(281) 600-1001 (fax)

Subject: September 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 September 2011. Dust data was collected from monitoring locations near the site fence line (Figure 1) when field work with the potential to generate dust was performed on site. An on site meteorological station is used to assess wind speed and direction. The anemometer broke on August 17th and was repaired on September 21st. As a result, meteorological data from a nearby station was used to evaluate wind speed from August 16th through September 21st. Meteorological data is provided in Attachment 1.



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

- September 23rd - All perimeter monitoring stations, including monitors upwind of site activities and monitors with no demolition activities in their proximity, recorded values above the sentinel value. The elevated dust concentrations are attributed to off-site conditions.

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

Sincerely,

Environmental Resources Management

Amy McDonald
ERM Former ASARCO Smelter Project Team Member

AM/hmh

Attachments

cc: MALCOLM Pirnie Former ASARCO Smelter Project Team

Figure

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

Fence Line Dust Monitoring Locations



For monitoring locations during September 2011.

Tables

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TABLE 1

September Fence Line 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 ug/m³.

Date	Location	Wind Direction	Value ($\mu\text{g}/\text{m}^3$)	Comments	Action
9/23/2011	All	Low to moderate winds throughout the day with winds speeds between 0 and 15 mph. Winds were predominately out of the south and south east in the morning and from variable directions in the afternoon.	48-56	All perimeter monitoring stations, including monitors upwind of site activities and monitors with no demolition activities in their proximity, recorded values above the sentinel value which indicate that elevated readings were due to off-site conditions.	No field modifications necessary

TABLE 2

September Fence Line Dust Monitoring Data Weekly Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Week of August 29th					
Date	Monday, August 29, 2011	Tuesday, August 30, 2011	Wednesday, August 31, 2011	Thursday, September 01, 2011	Friday, September 02, 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				26	23
West				25	23
North West				28	25
North				42	24
North East				29	23
East				26	26
Calavera				23	20

Week of September 5th					
Date	Monday, September 05, 2011	Tuesday, September 06, 2011	Wednesday, September 07, 2011	Thursday, September 08, 2011	Friday, September 09, 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		23	21	27	34
West		22	20	26	34
North West		26	22	29	39
North		39	22	40	41
North East		24	27	29	37
East		21	19	26	33
Calavera		20	12	21	30

Week of September 12th					
Date	Monday, September 12, 2011	Tuesday, September 13, 2011	Wednesday, September 14, 2011	Thursday, September 15, 2011	Friday, September 16, 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	31	20	18	23	28
West	31	21	19	22	27
North West	32	18	17	24	33
North	32	18	15	23	31
North East	37	<i>Malfunction</i>	13	22	25
East	32	24	18	23	29
Calavera	27	16	13	24	28

Week of September 19th					
Date	Monday, September 19, 2011	Tuesday, September 20, 2011	Wednesday, September 21, 2011	Thursday, September 22, 2011	Friday, September 23, 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	14	19	21	50
West	17	15	17	19	51
North West	21	16	20	23	56
North	20	15	19	18	51
North East	<i>Malfunction</i>	15	20	20	54
East	24	18	19	19	49
Calavera	11	14	16	16	48

Week of September 26th					
Date	Monday, September 26, 2011	Tuesday, September 27, 2011	Wednesday, September 28, 2011	Thursday, September 29, 2011	Friday, September 30, 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	13	12	10	21	21
West	20	14	15	21	15
North West	13	13	10	18	26
North	12	13	10	19	20
North East	13	11	10	16	19
East	20	14	13	19	19
Calavera	11	11	9	13	18

NOTES:

1. Readings indicate PM₁₀ dust based on direct read monitoring from TSI DustTrack II equipment.
2. Gray cell indicates that dust monitoring was not conducted that day because here were no demolition activities taking place that day.
3. Blue cell indicates that the meter malfunctioned at that location.

Meteorological Summary Graphs
Attachment 1

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