

November 16, 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: October 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 October 2011. Dust data is 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. 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 October with the exception of the East monitor on October 6<sup>th</sup>. Windy conditions existed on October 6<sup>th</sup> and demolition activities were taking place within 50 feet of the East monitor. Some of the elevated data may be attributed to exhaust from the heavy equipment and mist used to suppress dust during active demolition. Significant levels of visible dust were not observed during these demolition activities. A background dust evaluation was conducted on the elevated data using the upwind (West) monitor location. Subtracting the daily average background dust concentration from the daily average dust concentration for the East 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  $\mu\text{g}/\text{m}^3$ .

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**

*November 16, 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 October 2011.

## **Tables**

*November 16, 2011*  
*Project No. 0118148*

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

TABLE 1

## October 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/m<sup>3</sup>.*

| Date      | Location | Wind Direction   | Value (ug/m <sup>3</sup> ) | Comments   | Action                           |
|-----------|----------|--|----------------------------|--|----------------------------------|
| 10/6/2011 | East     | Moderate to high winds throughout the day with wind speeds between 6 and 26 mph. Winds were predominately out of the west. | 46                         | Subtracting background dust from the average dust reading for the East monitor results in the actual dust generated on site to be 29 ug/m <sup>3</sup> for the East monitor. Accounting for background dust concentration places site generated dust below the sentinel value. | No field modifications necessary |

TABLE 2

October Fence Line Dust Monitoring Data Weekly Summary

Texas Custodial Trust  
Former Asarco Smelter  
El Paso, Texas

| Week of October 3rd |                                      |                                      |                                      |                                      |                                      |
|---------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|
| Date                | Monday, October 03, 2011             | Tuesday, October 04, 2011            | Wednesday, October 05, 2011          | Thursday, October 06, 2011           | Friday, October 07, 2011             |
| Location            | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) |
| South               | 25                                   | 15                                   | 11                                   | 15                                   | 12                                   |
| West                | 27                                   | 15                                   | 15                                   | 17                                   | 12                                   |
| North West          | 23                                   | 18                                   | 16                                   | 16                                   | 11                                   |
| North               | 23                                   | 17                                   | 17                                   | 29                                   | 12                                   |
| North East          | 23                                   | 16                                   | 19                                   | 20                                   | 14                                   |
| East                | 25                                   | 17                                   | 28                                   | 46                                   | 26                                   |
| Calavera            | 19                                   | 13                                   | 10                                   | 11                                   | 8                                    |

| Week of October 10th |                                      |                                      |                                      |                                      |                                      |
|----------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|
| Date                 | Monday, October 10, 2011             | Tuesday, October 11, 2011            | Wednesday, October 12, 2011          | Thursday, October 13, 2011           | Friday, October 14, 2011             |
| Location             | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) |
| South                | 17                                   | 15                                   | 10                                   | 22                                   | 18                                   |
| West                 | 19                                   | 18                                   | 12                                   | 26                                   | 24                                   |
| North West           | 20                                   | 17                                   | 9                                    | 23                                   | 18                                   |
| North                | 18                                   | 17                                   | 8                                    | 21                                   | 18                                   |
| North East           | 9                                    | 17                                   | 9                                    | 17                                   | 17                                   |
| East                 | 21                                   | 19                                   | 12                                   | 29                                   | 22                                   |
| Calavera             | 11                                   | 15                                   | 7                                    | 20                                   | 17                                   |

| Week of October 17th |                                      |                                      |                                      |                                      |                                      |
|----------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|
| Date                 | Monday, October 17, 2011             | Tuesday, October 18, 2011            | Wednesday, October 19, 2011          | Thursday, October 20, 2011           | Friday, October 21, 2011             |
| Location             | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) |
| South                | 17                                   | 11                                   | 15                                   | 24                                   | 12                                   |
| West                 | 22                                   | 8                                    | 15                                   | 34                                   | 15                                   |
| North West           | 15                                   | 11                                   | 17                                   | 25                                   | 13                                   |
| North                | 15                                   | 7                                    | 14                                   | 24                                   | 13                                   |
| North East           | 16                                   | 6                                    | 12                                   | 22                                   | 11                                   |
| East                 | 27                                   | 7                                    | 13                                   | 28                                   | 13                                   |
| Calavera             | 11                                   | 5                                    | 12                                   | 22                                   | 9                                    |

| Week of October 24th |                                      |                                      |                                      |                                      |                                      |
|----------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|
| Date                 | Monday, October 24, 2011             | Tuesday, October 25, 2011            | Wednesday, October 26, 2011          | Thursday, October 27, 2011           | Friday, October 28, 2011             |
| Location             | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) |
| South                | 23                                   | 14                                   | 23                                   | 4                                    | 14                                   |
| West                 | 25                                   | 17                                   | 23                                   | 5                                    | 13                                   |
| North West           | 25                                   | 14                                   | 21                                   | 6                                    | 25                                   |
| North                | 34                                   | 14                                   | 25                                   | 5                                    | 16                                   |
| North East           | 25                                   | 15                                   | 25                                   | 4                                    | 14                                   |
| East                 | 25                                   | 16                                   | 28                                   | 5                                    | 15                                   |
| Calavera             | 19                                   | 11                                   | 14                                   | 4                                    | 11                                   |

| Week of October 31st |                                      |                                      |                                      |                                      |                                      |
|----------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|
| Date                 | Monday, October 31, 2011             | Tuesday, November 01, 2011           | Wednesday, November 02, 2011         | Thursday, November 03, 2011          | Friday, November 04, 2011            |
| Location             | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) | Average Reading (ug/m <sup>3</sup> ) |
| South                | 36                                   |                                      |                                      |                                      |                                      |
| West                 | 38                                   |                                      |                                      |                                      |                                      |
| North West           | 33                                   |                                      |                                      |                                      |                                      |
| North                | 32                                   |                                      |                                      |                                      |                                      |
| North East           | 34                                   |                                      |                                      |                                      |                                      |
| East                 | 38                                   |                                      |                                      |                                      |                                      |
| Calavera             | 22                                   |                                      |                                      |                                      |                                      |

NOTES:

1. Readings indicate PM<sub>10</sub> 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*

*November 16, 2011*  
*Project No. 0118148*

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















