

May 3, 2012

Mr. Roberto Puga, P.G., Trustee
ASARCO Texas Custodial Trust
c/o Project Navigator, Ltd.
One Pointe Drive, Suite 320
Brea, CA 92821

Subject: March 2012 Dust Monitoring Summary

Dear Mr. Puga:

Environmental Resources Management (ERM) and Malcolm Pirnie, Inc. (Malcolm Pirnie) performed dust monitoring activities at the Former ASARCO Smelter site in El Paso, Texas during the month of March 2012. When activities with the potential to generate dust were conducted on site, dust data was collected from monitoring locations near the site fence line, around the arroyo, and near La Calavera.

The following attachments are included with this letter:

- Attachment A: Figures
- Attachment B: Wind Rose Plot
- Attachment C: Tables
- Attachment D: Dust Concentration Graphs

Dust monitor locations are shown in Attachment A, Figure 1. An onsite meteorological station was used to assess wind speed and direction. A Wind Rose Plot summarizing the wind data for the month is provided in Attachment B. Dust Concentration graphs are provided in Attachment D.

Dust monitoring activities were conducted in accordance with the perimeter dust monitoring plan, with the following exceptions.

The MP-6 monitor, which is positioned in the North Location (see Figure 1, Attachment A) was used for East property drilling activities from March 6th to March 8th. Aside from these three days, the monitor was used as a back-up monitor while other monitors were being serviced. Once all monitors were operating properly, the monitor was repositioned in the North Location on March 27th to March 31st. This monitor was chosen to be used for the drilling activities and as a back-up monitor because the North Location is considered as a redundant monitoring location. Accordingly, as presented in Table 2, Attachment C, the readings for MP-6 are represented by





'ND' for 'not deployed' for the March days which it was not at the North location. East property location is added to Table 2, representing the drilling activities.

Daily average dust concentrations were at or below the site-specific sentinel value¹ of 43 $\mu\text{g}/\text{m}^3$ for all dust monitoring locations during the month of March with the exception of the following days:

March 6th – The daily average dust concentration for the West and East monitors was greater than the sentinel value.

Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at all monitor stations regardless of proximity to demolition activities. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.

March 7th – The daily average dust concentration for all monitors was greater than the sentinel value.

Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at all monitor stations regardless of proximity to demolition activities. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.

March 9th – The daily average dust concentration for the West monitor was greater than the sentinel value.

Dust was generated from concrete crushing activities located within 100 ft of the West monitor (downwind). Dust suppression was implemented based on dust concentrations above the sentinel value. The minute-by-minute data indicates that there were instantaneous spikes of elevated dust concentrations throughout the day, but most minute-by-minute data was below the sentinel value. When the daily average was calculated, it was above the sentinel value due to these spikes recorded by the monitor. A background dust evaluation was conducted on the elevated data using the upwind (East) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the West (downwind) location resulted in the actual dust generated on site to be 62 $\mu\text{g}/\text{m}^3$, which is above the sentinel value (43 $\mu\text{g}/\text{m}^3$). Subsequently, concrete crushing activities were moved to the interior of the property (i.e. away from the perimeter dust monitor) and dust suppression was

¹ The sentinel value was developed by Malcolm Pirnie and ERM as a real-time indicator for constituent concentrations in dust in lieu of the of daily sample collection and laboratory analysis





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further increased for the concrete crushing activities. After these corrective actions, the daily average dust concentration attributed to site activities was below the sentinel value.

March 12th – The daily average dust concentration for the West monitor was greater than the sentinel value.

Demolition activities were conducted within 200 ft of the West monitor. Dust suppression was implemented and no visible dust was observed to be migrating towards the monitor. A background dust evaluation was conducted on the elevated data using the upwind (East) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the West location resulted in the actual dust generated on site to be 28 $\mu\text{g}/\text{m}^3$, 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 Attachment C, Table 1, and the March summary of daily average dust concentration data is provided in Attachment C, Table 2. Also provided in Attachment C are the rolling 12-month elevated dust observation summaries organized by location.

Very truly yours,

MALCOLM PIRNIE, INC.

Alicia Fogg, PE
Project Engineer

Project 6835001

Attachments

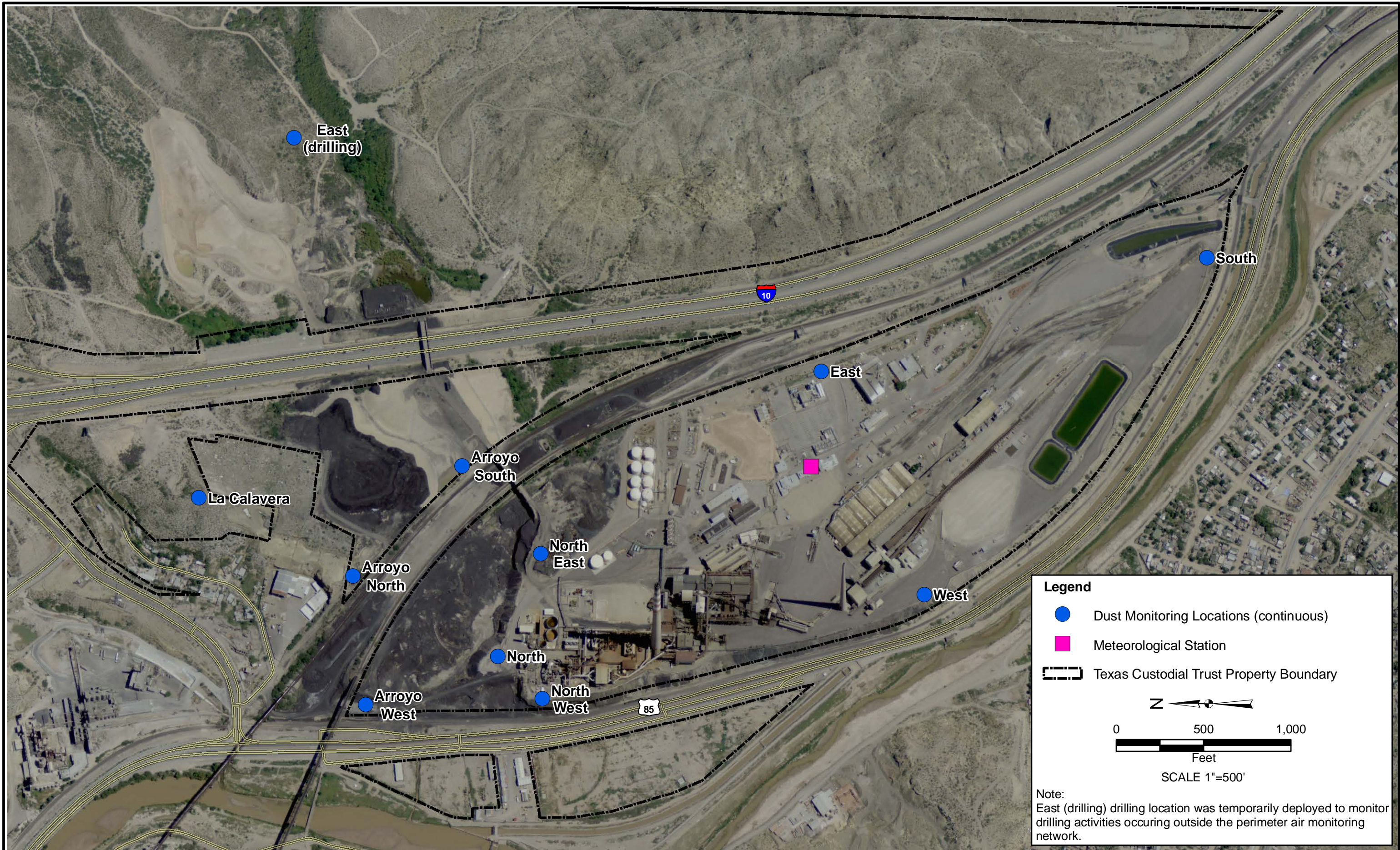
cc: ERM Former ASARCO Smelter Project Team





Attachment A

Figure 1



Legend

- Dust Monitoring Locations (continuous)
- Meteorological Station
- Texas Custodial Trust Property Boundary

SCALE 1"=500'

Note:
East (drilling) drilling location was temporarily deployed to monitor drilling activities occurring outside the perimeter air monitoring network.



Attachment B

Wind Rose Plots



Attachment C

Tables

TABLE 1

March 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 $\mu\text{g}/\text{m}^3$.

Date	Location	Wind Direction	Value ($\mu\text{g}/\text{m}^3$)	Comments	Action
3/6/2012	West and East	Low winds in the morning with wind speeds between 0 and 9 mph, and moderate to high winds in the afternoon with wind speeds between 7 and 30 mph. Winds were predominately out of the north in the morning and out of the west in the afternoon.	44-52	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.	No field modifications necessary
3/7/2012	All	Low to moderate winds in the morning with wind speeds between 0 and 20 mph, and moderate to high winds in the afternoon with wind speeds between 9 and 36 mph. Winds were predominately out of the north in the early morning and out of the west throughout the day	50-215	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.	No field modifications necessary
3/9/2012	West	Low to moderate winds throughout the day with wind speeds between 3 and 22 mph. Winds were predominately out of the east and southeast.	79	Dust was generated from concrete crushing activities located within 100 ft of the West monitor (downwind). Dust suppression was implemented based on dust concentrations above the sentinel value. The minute-by-minute data indicates that there were instantaneous spikes of elevated dust concentrations throughout the day, but most minute-by-minute data was below the sentinel value. When the daily average was calculated, it was above the sentinel value due to these spikes recorded by the monitor. A background dust evaluation was conducted on the elevated data using the upwind (East) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the West (downwind) location resulted in the actual dust generated on site to be 62 $\mu\text{g}/\text{m}^3$, which is above the sentinel value (43 $\mu\text{g}/\text{m}^3$). Subsequently, concrete crushing activities were moved to the interior of the property (i.e. away from the perimeter dust monitor) and dust suppression was further increased for the concrete crushing activities. After these corrective actions, the daily average dust concentration attributed to site activities was below the sentinel value.	Corrective actions were taken to increase dust suppression for these demolition activities.
3/12/2012	West	Low to moderate winds throughout the day with wind speeds between 1 and 15 mph. Winds were predominately out of the north in the morning and out of the west in the afternoon.	45	Demolition activities were conducted within 200 ft of the West monitor. Dust suppression was implemented and no visible dust was observed to be migrating towards the monitor. Exhaust from the heavy equipment in the area was migrating towards the monitor and contributed to the elevated reading. A background dust evaluation was conducted on the elevated data using the upwind (East) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the West location resulted in the actual dust generated on site to be 28 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$.	No field modifications necessary

TABLE 2

March Daily Average Dust Monitoring Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Week ending March 3rd						
Date				Thursday, March 01, 2012	Friday, March 02, 2012	Saturday, March 03, 2012
Location				Average Reading (ug/m ³)	Average Reading (ug/m ³)	Average Reading (ug/m ³)
South				17	24	
West				23	38	
East				Malfunction	39	
North				ND	ND	ND
North East				12	33	5
North West				9	25	4
Calavera				5	11	2
Arroyo West				15	37	6
Arroyo South				12	30	5
Arroyo North				10	29	5

Week ending March 10th						
Date	Monday, March 05, 2012	Tuesday, March 06, 2012	Wednesday, March 07, 2012	Thursday, March 08, 2012	Friday, March 09, 2012	Saturday, March 10, 2012
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)	Average Reading (ug/m ³)
South	25	38	173	27	16	
West	29	44	215	41	79	
East	24	52	190	25	17	
North	ND	ND	ND	ND	ND	ND
North East	29	34	147	23	14	11
North West	27	24	123	37	15	12
Calavera	13	6	50	10	7	6
East (drilling) ⁵	ND	22	136	11	ND	ND
Arroyo West	35	35	141	28	19	14
Arroyo South	30	33	144	25	15	12
Arroyo North	26	28	119	28	14	10

Week ending March 17th						
Date	Monday, March 12, 2012	Tuesday, March 13, 2012	Wednesday, March 14, 2012	Thursday, March 15, 2012	Friday, March 16, 2012	Saturday, March 17, 2012
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)	Average Reading (ug/m ³)
South	13	35	14	25	19	
West	45	36	37	38	30	
East	15	27	17	22	19	
North	ND	ND	ND	ND	ND	ND
North East	17	31	13	18	18	16
North West	15	26	11	16	17	15
Calavera	8	12	5	7	8	6
Arroyo West	20	40	20	22	24	20
Arroyo South	17	29	13	17	17	19
Arroyo North	15	26	13	17	17	14

Week ending March 24th						
Date	Monday, March 19, 2012	Tuesday, March 20, 2012	Wednesday, March 21, 2012	Thursday, March 22, 2012	Friday, March 23, 2012	Saturday, March 24, 2012
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)	Average Reading (ug/m ³)
South	23	8	5	6	7	
West	25	10	8	9	11	
East	22	13	6	7	9	
North	ND	ND	ND	ND	ND	ND
North East	23	9	7	8	10	14
North West	22	6	7	6	10	13
Calavera	4	Malfunction	Malfunction	2	17	7
Arroyo West	26	6	8	11	11	19
Arroyo South	21	5	6	8	9	15
Arroyo North	17	5	5	7	8	15

Week ending March 31st						
Date	Monday, March 26, 2012	Tuesday, March 27, 2012	Wednesday, March 28, 2012	Thursday, March 29, 2012	Friday, March 30, 2012	Saturday, March 31, 2012
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)	Average Reading (ug/m ³)
South	11	18	17	13	16	
West	15	25	22	27	17	
East	17	17	15	15	17	
North	ND	6	14	8	11	10
North East	9	13	17	10	12	10
North West	13	19	Malfunction	13	18	11
Calavera	4	6	9	5	6	5
Arroyo West	10	15	19	13	16	13
Arroyo South	8	12	16	10	12	12
Arroyo North	7	12	16	10	9	17

NOTES:

1. Readings indicate PM₁₀ dust based on direct read monitoring from TSI DustTrak II equipment.
2. Gray cell indicates that dust monitoring was not conducted that day because there were no demolition or remediation activities that day.
3. ND indicates that monitor was not deployed as detailed in the report.
4. Readings with 'Malfunction' listed were taken down for servicing and therefore no data was reported.
5. The East (drilling) location was temporarily deployed from March 6th to March 8th to monitor drilling activities that occurred outside the perimeter air monitoring network.

Dust Monitor Summary
South Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
9/13/2010	South	Elevated dust data was collected from a location upwind of site activities. Levels are higher than visible dust levels indicating unit malfunction since visible dust was not present. (Data point exceeds graph scale.)
9/21/2010	South	Elevated dust data was collected from a location upwind/crosswind of site activities, therefore the elevated dust readings are likely due to off-site conditions.
10/30/2010	South	Elevated dust data was collected from a location upwind/crosswind of site activities. No link to daily demolition activities observed.
2/8/2011	South	Significant dust storm occurred during the day limiting visibility on-site. In addition, a railroad crew was working east of site and was generating dust.
3/7/2011	South	High wind and dust advisory in effect throughout the day.
3/15/2011	South	Site work was not performed upwind of the East and South dust monitor locations indicating the elevated data was due to off-site conditions.
4/4/2011	South	Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day.
4/14/2011	South	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 monitor stations were reading concentrations just below the sentinel value indicating that the elevated readings were due to off-site conditions.
4/26/2011	South	Dusty and windy conditions for the entire El Paso and Juarez area. National Weather Service issued Wind Advisory and Hazardous Weather Outlook throughout the day. Heavy smoke from a large fire west of the site was also observed migrating onto the site in the late afternoon.
5/9/2011	South	Dusty and windy conditions for the entire El Paso and Juarez area. National Weather Service issued Wind Advisory and Hazardous Weather Outlook throughout the day. Heavy smoke from a large fire west of the site was also observed migrating onto the site in the late afternoon.
6/7/2011	South	All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions.
9/23/2011	South	All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions.
11/2/2011	South	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions.
11/29/2011	South	Hazy atmosphere in the morning and the smell of smoke was observed onsite throughout the morning. No demolition activities were performed in the southern part of site. Elevated readings are attributed to off-site conditions.
2/28/2012	South	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.
3/7/2012	South	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.

Dust Monitor Summary
West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
9/21/2010	West	Elevated dust data was collected from a location upwind/crosswind of site activities; therefore, the elevated dust readings were due to off-site conditions.
11/10/2010	West	Readings were due to a calibration error. All other monitor stations reported daily average values for total dust from 7 to 14 $\mu\text{g}/\text{m}^3$. No link to on-site demolition activities observed.
2/8/2011	West	Significant dust storm occurred during the day limiting visibility on-site. In addition, a railroad crew, not associated with the project, was working east of site and was generating dust.
2/14/2011	West	Heavy smoke from several large grass fires west of the site was observed migrating onto the site. In addition, a railroad crew, not associated with the project, was working east of site and was generating dust.
3/7/2011	West	High wind and dust advisory was in effect throughout the day.
3/11/2011	West	Elevated dust data was reported upwind/crosswind of site activities indicating the elevated data was due to off-site conditions.
3/17/2011	West	Higher sustained winds were out of the west in the afternoon. Elevated total dust readings were observed upwind of the site activities indicating that the elevated readings were due to off-site conditions.
3/21/2011	West	Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day.
3/24/2011	West	Heavy equipment not associated with the project was working on the river embankment west of the site near the west monitor location. Dust generated from the work on the river embankment was observed blowing across Paisano Dr. and onto the site. Elevated dust data was observed upwind of site activities.
4/26/2011	West	Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day.
5/9/2011	West	Dusty and windy conditions for the entire El Paso and Juarez area. National Weather Service issued Wind Advisory and Hazardous Weather Outlook throughout the day. Heavy smoke from a large fire west of the site was also observed migrating onto the site in the late afternoon.
6/7/2011	West	All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions.
6/24/2011	West	Subtracting background dust from the average dust reading for the West monitor location results in the actual dust generated on site to be 24 $\mu\text{g}/\text{m}^3$ for the West monitor location. Accounting for background dust concentration results in site generated dust below the sentinel value.
9/23/2011	West	All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions.
11/2/2011	West	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions.
11/30/2011	West	The surrounding atmosphere was hazy throughout the day. Monitor stations upwind of site activities and monitors with no demolition activities in their proximity recorded elevated data. The elevated readings are attributed to off-site conditions.
2/7/2012	West	Demolition activities were conducted northeast, and within 100 feet of the West Monitor. Dust suppression was implemented, and visible dust was not observed to be migrating towards the monitor. A background dust evaluation was conducted on the elevated data and resulted in the actual dust generated on site to be 32 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$.
2/8/2012	West	Demolition activities were conducted southeast, and within 100 feet, of the West Monitor. Dust suppression was implemented, and visible dust was not observed to be migrating towards the monitor. A background dust evaluation was conducted on the elevated data and resulted in the actual dust generated on site to be 28 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$.
2/28/2012	West	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.
3/6/2012	West	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.
3/7/2012	West	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.
3/9/2012	West	Demolition activities were conducted within 100 ft of the West monitor. Visible dust was generated from the work activities and dust suppression was implemented. Corrective actions were taken to increase dust suppression for these demolition activities.
3/12/2012	West	Demolition activities were conducted within 200 ft of the West monitor. Dust suppression was implemented and no visible dust was observed to be migrating towards the monitor. A background dust evaluation was conducted on the elevated data and resulted in the actual dust generated on site to be 28 $\mu\text{g}/\text{m}^3$ which is below the site-specific sentinel value of 43 $\mu\text{g}/\text{m}^3$.

Dust Monitor Summary
East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
1/31/2011	East	Significant dust storm occurred during the day limiting visibility on-site.
2/8/2011	East	Significant dust storm occurred during the day limiting visibility on-site. In addition, a railroad crew, not associated with the project, was working east of site and was generating dust.
3/7/2011	East	High wind and dust advisory was in effect throughout the day.
3/11/2011	East	Windy and dusty conditions observed throughout the day. Sustained winds out of the west and northwest in the afternoon. The elevated dust data was reported upwind/crosswind of site activities indicating the elevated data was due to off-site conditions.
3/15/2011	East	Site work was not performed upwind of the East and South dust monitor stations indicating the elevated data was due to off-site conditions.
4/4/2011	East	Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day.
4/26/2011	East	Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day.
6/7/2011	East	All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions.
9/23/2011	East	All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions.
10/6/2011	East	Subtracting background dust from the average dust reading for the East monitor station results in the actual dust generated on site to be 29 ug/m3 for the East monitor station. Accounting for background dust concentration places site generated dust below the sentinel value.
11/2/2011	East	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions.
11/21/2011	East	Dusty and windy conditions existed in the El Paso area causing dust from areas with no demolition activities to migrate towards the monitor station. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. Wind speeds up to 41 mph were recorded, and no demolition activities occurred in the proximity of the monitor station. The times that elevated levels of dust were recorded directly correlate with times that high winds occurred; the elevated dust concentration is attributed to off-site conditions.
11/30/2011	East	The surrounding atmosphere was hazy throughout the day. Monitor stations upwind of site activities and monitors with no demolition activities in their proximity recorded elevated data. The elevated readings are attributed to off-site conditions.
1/16/2012	East	The daily average dust concentration for the East monitor was greater than the sentinel value. Windy and hazy conditions existed in the El Paso and Juarez area. The National Weather Service issued a Hazardous Weather Outlook for the afternoon, and wind speeds up to 35 mph were recorded on site. Demolition activities were taking place near the monitor, and dust suppression activities were implemented during the demolition activities. However, visible dust from areas without active demolition was observed to migrating towards the monitor when wind speeds were high. A background dust evaluation was conducted on the elevated data and resulted in the actual dust generated on site to be 31 ug/m3 which is below the site-specific sentinel value of 43 ug/m3.
2/28/2012	East	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.
3/6/2012	East	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.
3/7/2012	East	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.

Dust Monitor Summary
North Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
9/22/2010	North	Elevated readings were noted during equipment set up and take down while there were no demolition activities. The average total dust concentrations while demolition activities were being performed onsite was 11.6 µg/m ³ .
2/8/2011	North	Significant dust storm occurred during the day limiting visibility on-site. In addition, a railroad crew, not associated with the project, was working east of site and was generating dust.
2/14/2011	North	Heavy smoke from several large grass fires west of the site was observed migrating onto the site. In addition, a railroad crew, not associated with the project, was working East of site and was generating dust.
2/25/2011	North	Equipment malfunctioned and reported erroneous results. The North monitoring location was generally upwind or crosswind of site activities.
3/7/2011	North	High wind and dust advisory in effect throughout the day.
4/26/2011	North	Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day.
6/7/2011	North	All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions.
6/8/2011	North	Dusty and hazy conditions developed in the afternoon. Accounting for background dust concentration results in site generated dust below the sentinel value.
8/29/2011	North	Subtracting background dust from the average dust reading for the North monitor station results in the actual dust generated on site to be 43 ug/m ³ for the North monitor station. Accounting for background dust concentration places site generated dust at the sentinel value.
8/30/2011	North	Subtracting background dust from the average dust reading for the North monitor station results in the actual dust generated on site to be 12 ug/m ³ for the North monitor station. Accounting for background dust concentration places site generated dust below the sentinel value.
8/31/2011	North	Subtracting background dust from the average dust reading for the North monitor station results in the actual dust generated on site to be 16 ug/m ³ for the North monitor station. Accounting for background dust concentration places site generated dust below the sentinel value.
9/23/2011	North	All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions.
11/2/2011	North	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions.
11/30/2011	North	The surrounding atmosphere was hazy throughout the day. Monitor stations upwind of site activities and monitors with no demolition activities in their proximity recorded elevated data. The elevated readings are attributed to off-site conditions.
12/1/2011	North	Windy and hazy conditions existed throughout the day and the surrounding atmospheric conditions were poor. Subtracting background dust from the average dust reading for the North monitor results in the actual dust generated on site to be 20 ug/m ³ for the North monitor. Accounting for background dust concentration places site generated dust below the sentinel value.

Dust Monitor Summary
North East Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
1/31/2011	North East	Significant dust storm occurred during the day limiting visibility on-site.
2/8/2011	North East	Significant dust storm occurred during the day limiting visibility on-site. In addition, a railroad crew, not associated with the project, was working east of site and was generating dust.
3/7/2011	North East	High wind and dust advisory in effect throughout the day.
3/11/2011	North East	Elevated dust data was reported upwind/crosswind of site activities indicating the elevated data was due to off-site conditions.
4/4/2011	North East	Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day.
4/26/2011	North East	Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day.
6/2/2011	North East	Dusty conditions developed in the afternoon. Accounting for background dust concentration results in site generated dust below the sentinel value.
6/7/2011	North East	All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions.
6/8/2011	North East	Dusty and hazy conditions developed in the afternoon. Accounting for background dust concentration results in site generated dust below the sentinel value.
6/13/2011	North East	Dusty and hazy conditions developed in the afternoon. Accounting for background dust concentration results in site generated dust below the sentinel value.
6/14/2011	North East	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. Accounting for background readings due to wildfire smoke results in site generated dust below the sentinel value.
9/23/2011	North East	All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions.
11/2/2011	North East	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions.
11/30/2011	North East	The surrounding atmosphere was hazy throughout the day. Monitor stations upwind of site activities and monitors with no demolition activities in their proximity recorded elevated data. The elevated readings are attributed to off-site conditions.
12/1/2011	North East	Windy and hazy conditions existed throughout the day, and the surrounding atmospheric conditions were poor. Subtracting background dust from the average dust reading for the North East monitor results in the actual dust generated on site to be 30 ug/m3 for the North East monitor. Accounting for background dust concentration places site generated dust below the sentinel value.
2/28/2012	North East	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.

Dust Monitor Summary
North West Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
10/1/2010	North West	Dust readings are higher than visible dust levels indicating unit malfunction since visible dust was not present. (Data point exceeds graph scale.)
10/2/2010	North West	Dust readings are higher than visible dust levels indicating unit malfunction since visible dust was not present. (Data point exceeds graph scale.)
2/8/2011	North West	Significant dust storm occurred during the day limiting visibility on-site. In addition, a railroad crew was working east of site and was generating dust.
3/7/2011	North West	High wind and dust advisory in effect throughout the day.
4/4/2011	North West	Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day.
4/26/2011	North West	Dusty and windy conditions for the entire El Paso and Juarez area. High wind and blowing dust advisory throughout the day.
6/1/2011	North West	Dusty conditions developed in the afternoon. Accounting for background dust concentration results in site generated dust below the sentinel value.
6/7/2011	North West	All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions.
9/23/2011	North West	All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions.
11/2/2011	North West	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Hazardous Weather Outlook for the afternoon. The elevated dust concentrations for the day are attributed to off-site conditions.
11/30/2011	North West	The surrounding atmosphere was hazy throughout the day. Monitor stations upwind of site activities and monitors with no demolition activities in their proximity recorded elevated data. The elevated readings are attributed to off-site conditions.
12/1/2011	North West	Windy and hazy conditions existed throughout the day and the surrounding atmospheric conditions were poor. Subtracting background dust from the average dust reading for the North West monitor results in the actual dust generated on site to be 27 ug/m3 for the North West monitor. Accounting for background dust concentration places site generated dust below the sentinel value.

Dust Monitor Summary
Calavera Elevated Data Summary

Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
10/30/2010	Calavera	The Calavera and North monitor stations were stationed generally downwind of site activities. The North monitor station was closer to site activities than the Calavera dust monitor station. The North monitor station did not report elevated dust data. As such, elevated dust data from the Calavera monitor station is attributed to offsite conditions and not a result of on site activities.
1/31/2011	Calavera	Significant dust storm occurred during the day limiting visibility on-site.
2/8/2011	Calavera	Significant dust storm occurred during the day limiting visibility on-site. In addition, a railroad crew, not associated with the project, was working east of site and was generating dust.
6/7/2011	Calavera	All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions.
9/23/2011	Calavera	All perimeter monitor stations, including monitor stations upwind of site activities, recorded concentrations above the sentinel value which indicate that elevated readings were due to off-site conditions.

Dust Monitor Summary
Arroyo West Elevated Data Summary
Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

Date	Location	Comments
11/30/2011	Arroyo West	The surrounding atmosphere was hazy throughout the day. Monitor stations upwind of site activities and monitors with no demolition activities in their proximity recorded elevated data. The elevated readings are attributed to off-site conditions.

Dust Monitor Summary
Arroyo South Elevated Data Summary
Texas Custodial Trust
Former Asarco Smelter
El Paso, Texas

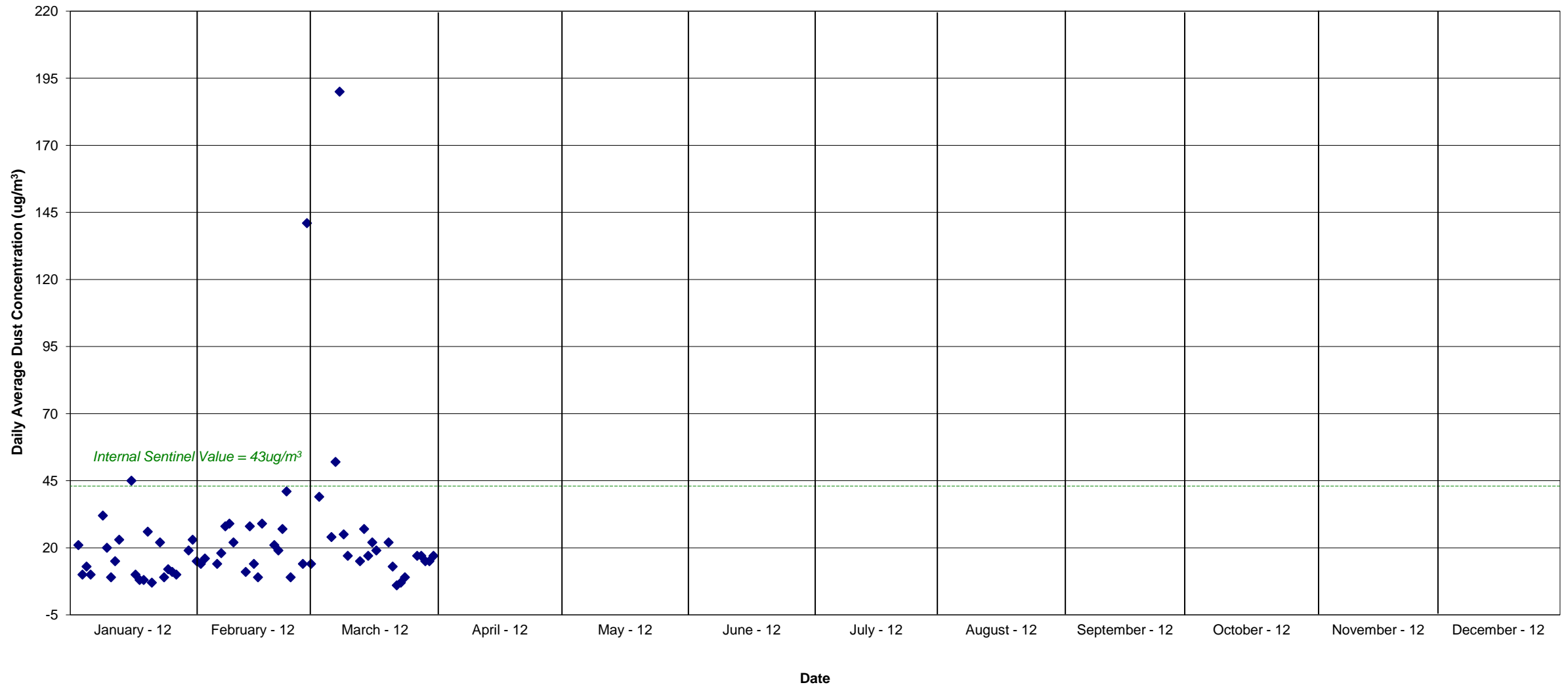
Date	Location	Comments
12/10/2011	Arroyo South	The surrounding atmosphere was generally hazy throughout the day. The smell of smoke was observed onsite indicating that smoke particles from surrounding fires were migrating onto the site. Perimeter monitoring stations, including monitors upwind of site activities and monitors with no construction activities in their proximity, recorded elevated data. The elevated readings are attributed to off-site conditions.
1/31/2012	Arroyo South	The daily average dust concentration for the Arroyo South monitor was greater than the sentinel value. Landfill construction activities took place immediately upwind of to the monitor during the afternoon hours. Dust suppression was implemented to reduce the dust generated by the activity. Additionally, the monitor was re-located to a position further downwind of the construction activities to protect the monitor from damage and allow for accurate measurement of dust concentrations leaving the area. Elevated dust concentrations were not observed at monitors located off-site and downwind of the Arroyo south monitor. A background dust evaluation was conducted using the upwind (Arroyo North) monitor location. Subtracting the daily average background dust concentration at the upwind location from the daily average dust concentration for the Arroyo South location resulted in the actual dust generated on site to be 29 ug/m3 which is below the site-specific sentinel value of 43 ug/m3.
2/28/2012	Arroyo South	Dusty and windy conditions existed in the El Paso area causing elevated dust concentrations at monitor stations upwind of demolition activities and monitor stations with no demolition activities in their proximity. The National Weather Service issued a Wind Advisory and Hazardous Weather Outlook for the day. The elevated dust concentrations for the day are attributed to off-site conditions.



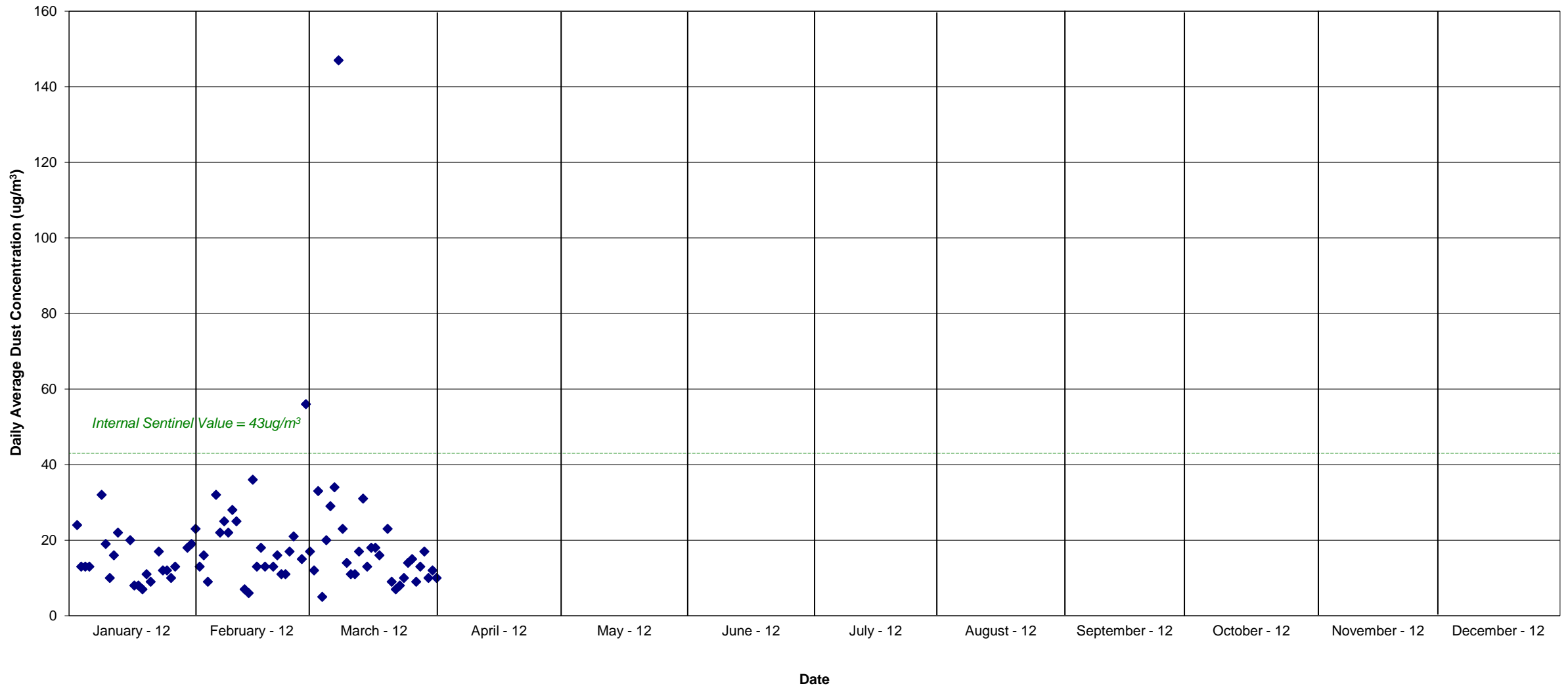
Attachment D

Dust Concentration Graphs

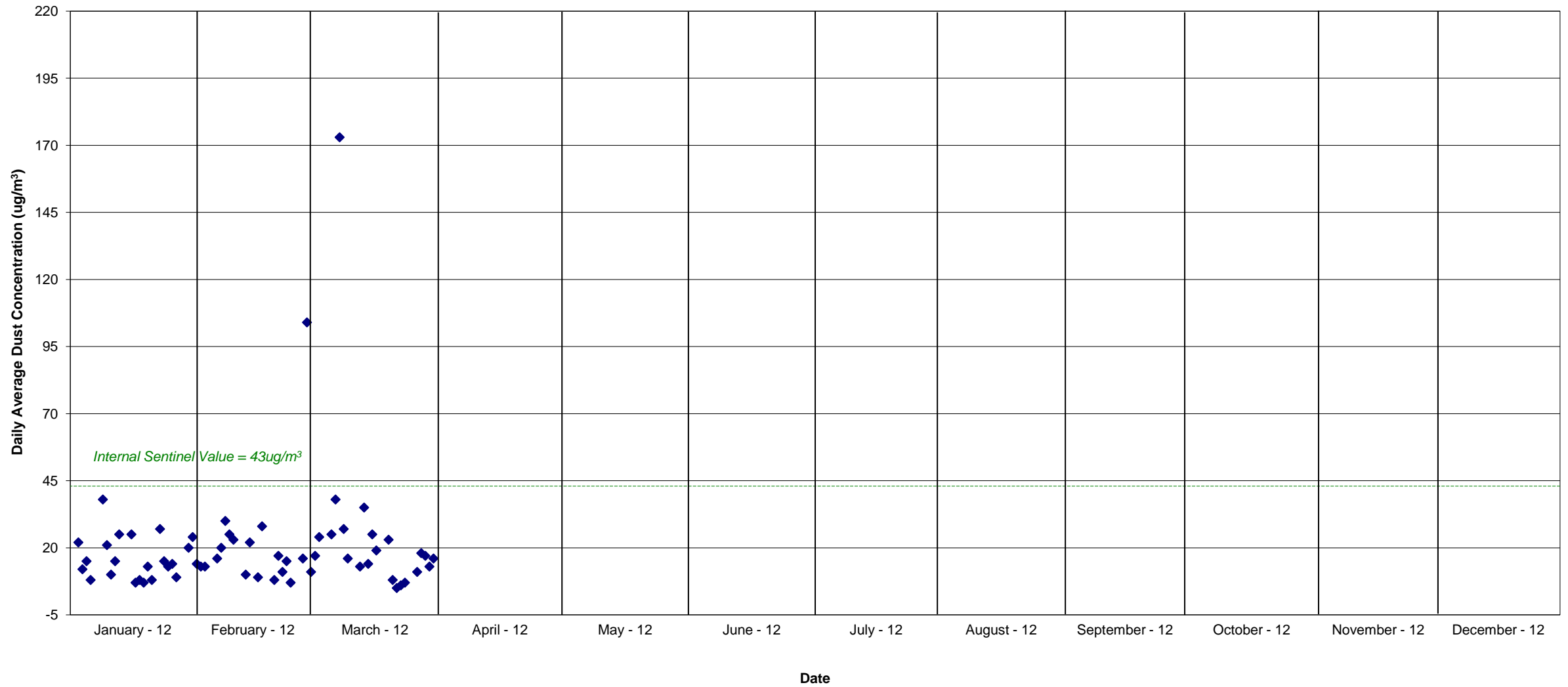
2012 Dust Monitor Summary
East Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



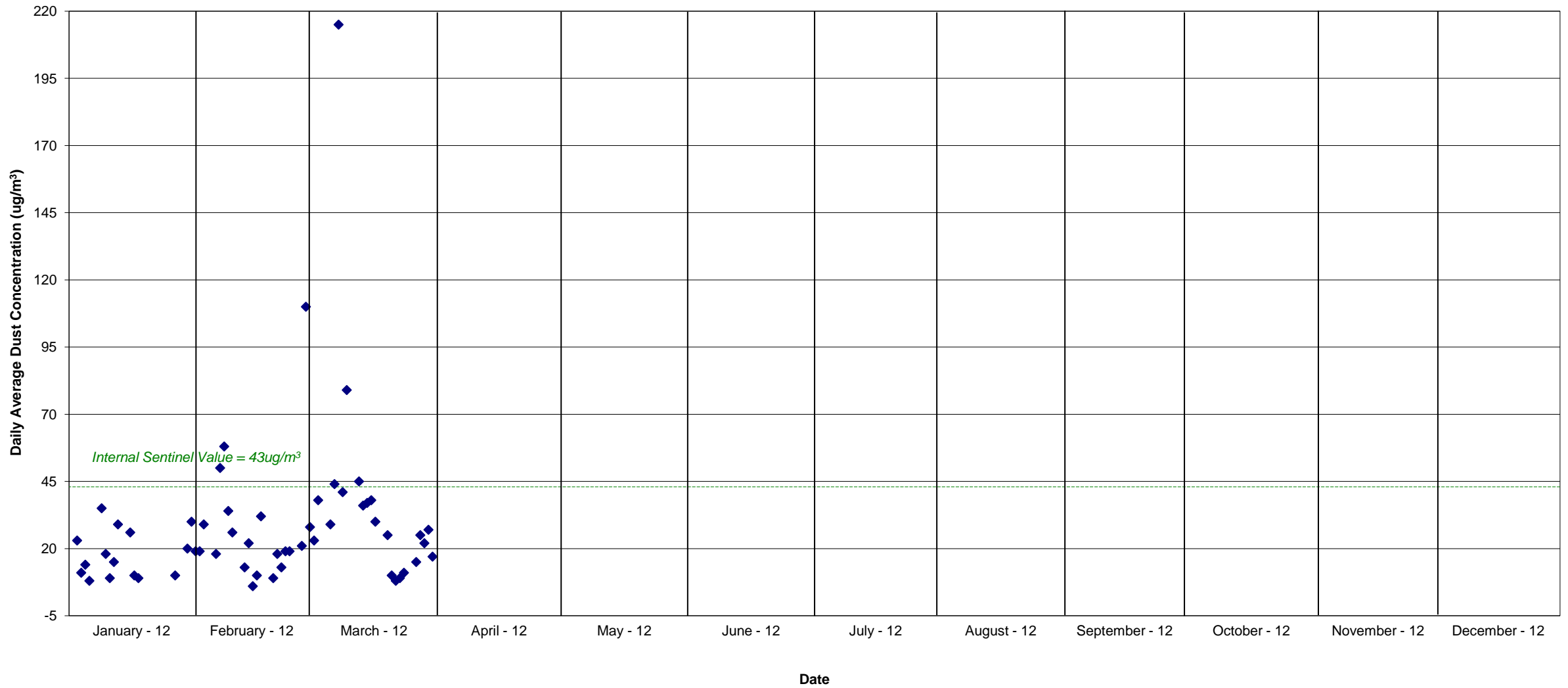
2012 Dust Monitor Summary
North East Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



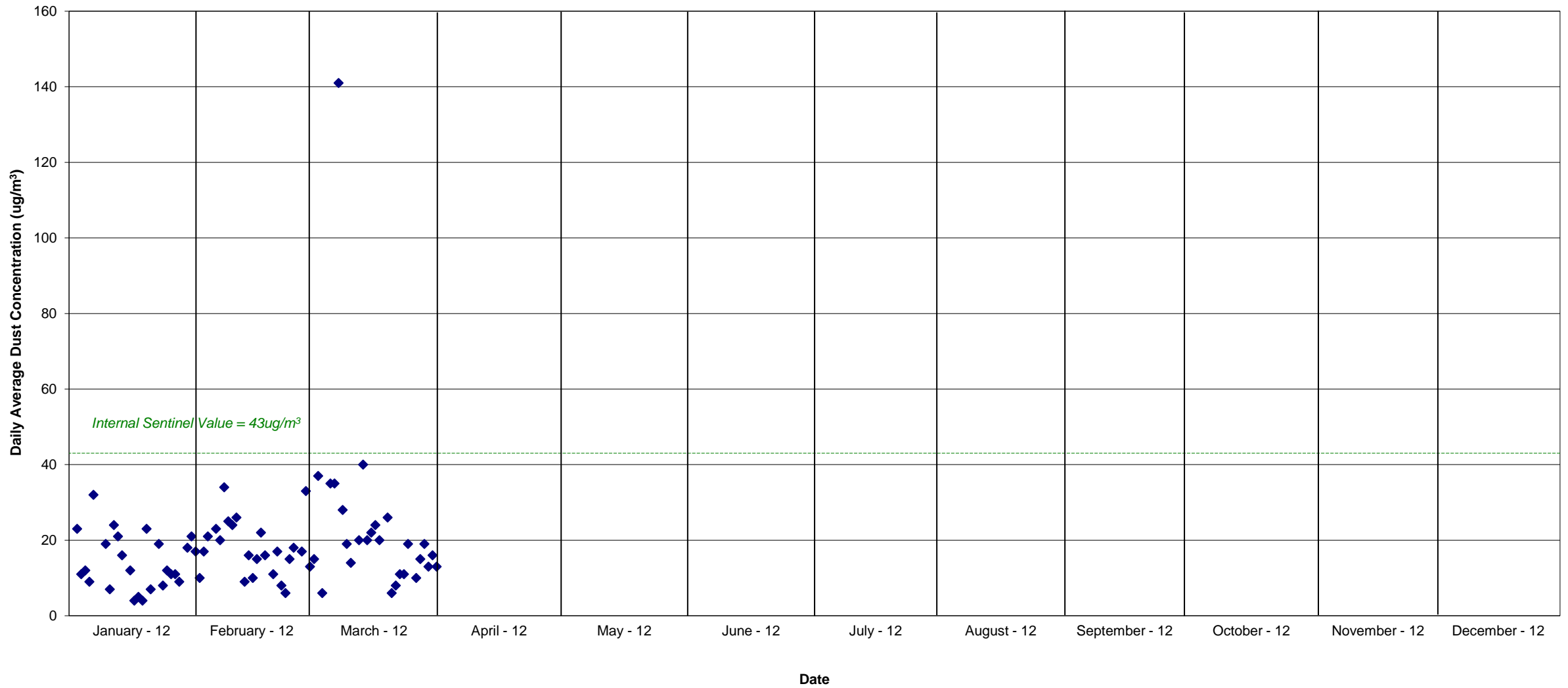
2012 Dust Monitor Summary
South Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



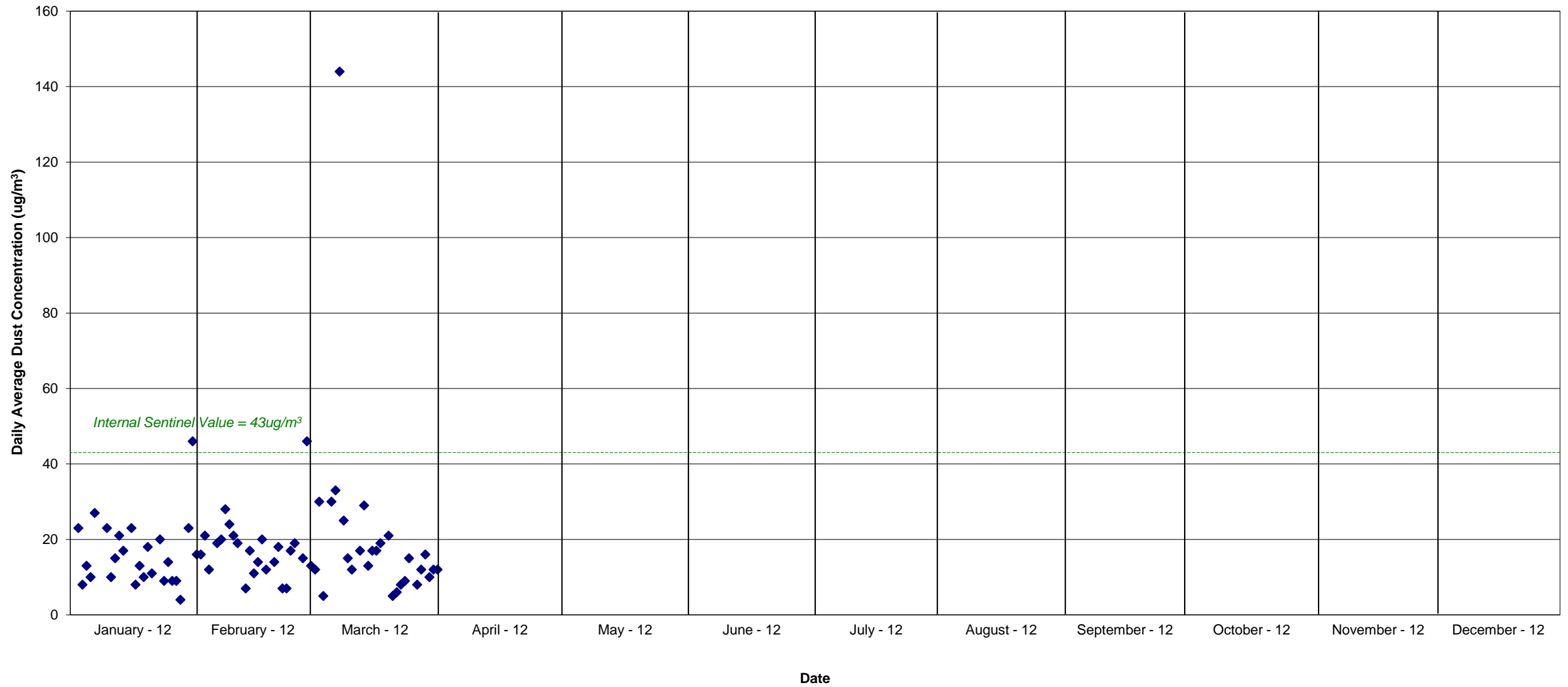
2012 Dust Monitor Summary
West Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



2012 Dust Monitor Summary
Arroyo West Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



2012 Dust Monitor Summary
Arroyo South Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas



2012 Dust Monitor Summary
Arroyo North Monitor Location
Former ASARCO Smelting Facility
El Paso, Texas

