Chino Smelter Stacks Demolition Air Monitoring Plan

Chino Mine Company
210 Cortez Avenue
Hurley, New Mexico 88043

May 17, 2007

Prepared by:
Guardian Consulting Company Inc.
Phoenix, Arizona 85053

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1.0 INTRODUCTION

The Chino Stacks Demolition Air Monitoring Plan (Plan) has been prepared by Guardian Consulting Company Inc. (Guardian). The Plan is designed to ensure an environmentally sound, safe, and efficient demolition of the two Chino Smelter Stacks located in Hurley, New Mexico. Sampling will involve perimeter sampling before, during, and after the demolition of the stacks. The purpose of the sampling is to document air quality during the demolition of the stacks and any subsequent impact to the residents of Hurley or the environment.

The Plan is designed to quantify the following analytes and constituents of concern (COCs).

Arsenic, Cadmium, Chromium, Copper, Lead, Molybdenum, Zinc and Asbestos

2.0 PROJECT DESCRIPTION

The Plan outlines procedures used to sample and analyze various constituents during the demolition of the stacks. It will define the operating parameters wherein the actual demolition will be allowed to proceed.

3.0 DEFINITIONS

 PM_{10} – EPA established procedure for measuring respirable particulates 10 micro meters in diameter or smaller during a 24 hour exposure.

Total Metals – Metals identified as potential constituents in the stack regulated by EPA and OSHA.

TSP – High volume sample method where air is drawn from a flow rate of approximately 1 cm per minute through a glass fiber filter. Sampling is continuous for a 24 hour period. Particles in the approximate size range 0.1 - 50 micro meters are collected.

COCs - Constituents of Concern: Arsenic, Cadmium, Chromium, Copper, Lead,

Molybdenum, Zinc and Asbestos.

"XRF" means the x-ray fluorescence method of analyzing metals according to EPA

Method 6200.

Area of Investigation (AOI) – defined operational area located within smelter closure

4.0 SAMPLING OBJECTIVES

Guardian understands that the State of New Mexico will be performing PM_{10} and TSP particulate air sampling in the residential areas near the stack demolition. The State of

New Mexico will set up sampling equipment at two locations adjacent to PD sample

locations. These two locations will have a PM₁₀ and TSP sampler operated by the State

and PD samplers for Metals and asbestos. All Chino air monitoring will be performed

under the direction of Guardian's Certified Industrial Hygienist, Mr. Assaf. NMED will

supervise NMED monitoring equipment independently.

• Area samples will be conducted following established Occupational Safety and

Health (OSHA) protocols for sampling and analysis.

• Samples will be collected prior to the demolition of the stacks to establish a

Baseline. Samples will then be collected during and after the demolition to

evaluate any environmental impact.

• Samples will be collected for a period of 6 to 8 hours and will vary based on the

visible emissions, wind conditions and dust retention time.

• Demolition will only occur during favorable wind conditions. Winds shall be at

least 1 to 3 mph and will be from the southwest, west, or northwest. Wind speed

and direction is collected at NMED meteorological station at the ball field. This

data will be utilized to verify favorable conditions prior to demolition.

4.1 Asbestos Air Samples

Due to safety concerns, thirty three feet (approximately 2,500 square feet) of

Category I nonfriable asbestos-containing mastic could not be removed from the

top section of the Kennecott stack. The stack support bands broke during the

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asbestos abatement while the contractor was working 500 feet from the ground.

Further accident investigation identified numerous other bands that were cracked,

rusted, and deteriorated thereby making further abatment work too unsafe for

employees.

Two air samples will be collected for analysis at the Chino Club and Security

Gate to verify that asbestos levels, if any, from the stack demolition are below

regulatory limits.

4.2 Soil Sampling

PD will collect soil samples at the following locations. These samples will be

collected prior to the demolition of the stack and immediately following the

demolition period. The samples will be analyzed for be Copper, Molybdenum, Lead

and Zinc.

AOI - 6 numbers 3,8,11, and 12

AOI - 5 number 3

Post demolition soil sampling of residences will only be initiated if there is

measurable difference in copper concentration between the baseline and the

demolition air monitoring samples. Additionally, video or other photographic

documentation will be reviewed in making the final determination of any action plan.

5.0 SAMPLING PROCEEDURES

Sampling will be conducted using the following:

Temperature, wind direction and other climate conditions will be documented.

• Battery powered MSA and Gilian air sampling pumps will be employed for area

sampling.

• All sampling pumps will be calibrated using a Gilian Primary Flow Calibrator

(Gilibrator) before and after each sampling period.

Air sampling shall be conducted prior to, during and following the demolition of the

stacks.

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• A report will be developed to include information pertaining to the field survey, field measurements, and sampling.

6.0 SAMPLE LOCATION

The majority of the samples will be placed along the eastern side of the town site. Eleven portable air sampling pumps will be strategically placed around the project at the following locations:

- 1. Guard Gate
- 2. PD parking lot
- 3. Natural Gas Valve
- 4. Under Pass
- 5. Meteorological Station
- 6. South Security Gate
- 7. Acid Tanks
- 8. Golf Course
- 9. Big Muddy Area
- 10. General Office
- 11. Chino Club

7.0 SAMPLE ANALYSIS

Sampling will be performed to determine the following:

- Perimeter samples will be analyzed for
 - o Arsenic
 - o Cadmium
 - o Chromium
 - o Copper
 - o Lead
 - o Molybdenum
 - o Zinc

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- Two samples will also be collected for Asbestos
- Soil samples in AOI-6 will be analyzed for copper

8.0 QUALITY CONTROL

Sampling will performed in accordance with American Industrial Hygiene guidelines, Occupational Safety and Health Administration (OSHA) and Environmental Protection Agency (EPA) standards. All sample analysis will be conducted by an accredited laboratory.