

PLAINTIFF'S EXHIBIT

ASA-1518

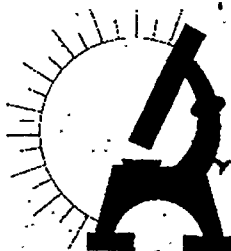
ASBESTOS INSPECTION
AT THE
POWER HOUSE BLDG
BASEMENT FLOOR
UNITS 7, 6, 5, 4, 2 AND
CIRCUIT PUMP # 3

FOR:

ASARCO INCORPORATED
P.O. BOX 1111
El Paso, Texas 79999



PREPARED BY:



SUN
CITY
ANALYTICAL
INC.

ENVIRONMENTAL CONSULTANTS

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AN ASBESTOS INSPECTION
OF
UNITS 7, 6, 5, 4, & 2
AT THE POWER HOUSE BLDG
FOR
ASARCO INCORPORATED

TABLE OF CONTENTS

REPORT

Summary
Introduction
Objectives
Inspection Methodology
Findings & Recommendations
Report Description
AHERA Inspection Report

LABORATORY RESULTS

DRAWINGS

Inspection Data
ACM Areas

INVENTORY OF ACM & NESHAP CLASSIFICATION

CERTIFICATIONS

SUMMARY

Sun City Analytical, Inc. (SCAI) was contracted by Peggy Munsell of Asarco Incorporated to perform an asbestos inspection of units 7, 6, 5, 4, 2 and circuit pump # 3 in the basement of the power house building located in El Paso, Texas. The field work was conducted on October 21, 1997. The findings of the inspection are enclosed in this report.

The asbestos inspection pertains to various thermal insulation materials located on units 7, 6, 5, 4, 2 and circuit pump # 3 in the basement of the power house building. These units will undergo renovation activities in phases. The SCAI inspectors took samples of the various dimensions of pipping involved in these areas and the results confirmed that the materials do contain asbestos.

Presently there are no federal or state regulations mandating asbestos removal for buildings. There is however, the National Emission Standard for Hazardous Air Pollutants (NESHAP) a federal regulation and state regulations that mandate asbestos inspections and removal of asbestos containing materials, but only prior to demolition and renovation activities.

REPORT

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**REPORT OF AN ASBESTOS INSPECTION
ON UNITS 7, 6, 5, 4, & 2
AT THE POWER HOUSE BLDG**

INTRODUCTION

This report contains the methodology, analysis, and results of an asbestos inspection performed on power house building. The sampling was conducted in accordance with the Asbestos Hazard Emergency Response Act (AHERA) regulations 40 CFR Part 763. The intent of this inspection was to locate and sample all suspected ACM and suspected asbestos containing building materials (ACBM) within the building. The presence of asbestos in a building does not mean that the health of building occupants is necessarily endangered. As long as (ACM) remains in good condition and is not disturbed, exposure is unlikely. Current regulations: (1) restrict the use of most asbestos products in new buildings, (2) specify work practices for the removal of ACM from buildings, and (3) require the identification of asbestos in schools. There are no exposure standards for non-industrial settings, and no regulations requiring corrective actions in buildings with ACM.

ACM in buildings is found in three forms: (1) sprayed or troweled on ceilings and walls (known as surfacing materials); (2) in insulation around hot or cold pipes, ducts, boilers, and tanks (known as thermal insulation); and (3) in a variety of other products such as ceiling and floor tiles and wall boards (known as miscellaneous materials). In general, ACM in the first two categories is of greatest concern, especially if it is friable. (Friable material means anything that can be crumbled, pulverized, or reduced to powder by hand pressure.) Most ACM in the third category is non-friable meaning anything that cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Polarized Light Microscopy was used to determine whether or not the materials sampled contained asbestos. A material is ACM or ACBM, by definition in 40 CFR 763, if it contains at least 1% by weight of any or in any combination of following asbestiform varieties: actinolite, amosite, anthophyllite, chrysotile, crocidolite, or tremolite.

OBJECTIVES

The objective of this study was to conduct an asbestos inspection on units 7, 6, 5, 4 & 2 in the basement of the power house building that would meet the EPA regulation 40 CFR 763, EPA 40 CFR 61 and the Texas Department of Health asbestos regulations. Specifically to locate, identify and assess all visible asbestos containing materials.

INSPECTION METHODOLOGY

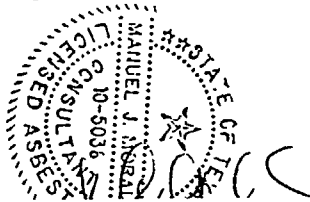
An asbestos inspection team performed the inspection as requested by Asarco Incorporated. The inspector located, obtained samples of the suspected ACM, ACBM as well as documenting the necessary information on the samples, sample locations. To assure adherence to 40 CFR 763:

1. The inspection was performed by inspectors accredited in the State of Texas in accordance with Section 206 of Title II of the Toxic Substance Control Act (TSCA), 15 U.S.C. 2601.
2. A walk-thru of the areas involved was conducted before any bulk sampling was performed in order to aid in the determination of possible ACM or ACBM locations.
3. The Inspector visually inspected the units to determine the location of the suspected ACM or ACBM. All sample locations were documented by the inspector.
4. When the suspected ACM or ACBM was discovered, the material was physically touched by the inspector to determine friability.
5. Homogeneous areas are defined by the type of materials determined by the inspector.
6. From each homogeneous area, a representative sample or samples were taken by the inspector.
7. Samples were analyzed by PLM microscopy to determine the type and percentage of asbestos content. A minimum of 10% were re-analyzed for quality control measures.

FINDINGS and RECOMMENDATIONS

SCAI inspectors took various samples of the thermal insulation materials located on the units surveyed. The materials found to contain asbestos were the pipe fittings, hangers, valves, tees, etc. and pipe insulation.

The ACM thermal insulation located on units 7, 6, 5, 4 & 2 has moderate damage and is classified by EPA under the National Emission Standards for Hazardous Air Pollutants (NESHAP) as Regulated Asbestos Containing Material (RACM) friable material. This means that the material when dry will become friable if renovation/demolition activities are performed. If the removal of these materials becomes necessary then the method of removal to be used should take the NESHAP regulations into account. SCAI recommends that this materials be removed prior to renovation/demolition activities on the units by a licensed asbestos abatement contractor. The owner should also contract a licensed asbestos consultant to prepare the abatement plan and oversee the abatement process.



**Guidance for reading the SCAI AHERA Inspection Report
for Units 7,6,5,4 & 2 at the Power House Building**

REPORT DESCRIPTION

1. This asbestos report has been designed to provide the information concisely for units 7,6,5,4 & 2 at the power house bldg. The following is a listing of information contained in the inspection report.
 - a. Owner/Client - **ASARCO INCORPORATED** for which this asbestos report has been generated.
 - b. Building Number - a number or letter assigned to each floor or building.
 - c. Building Name - **Power House Building**.
 - d. Inspector/Accreditation - the name of the accredited inspector who performed the inspection, his/her accreditation number, and state of accreditation.
 - f. Inspection Date - the date the building was inspected.
 - g. The AHERA report is divided into two sections the ASBESTOS and the NON-ASBESTOS section. Note the bold heading below the summary. The page number of either non-asbestos or asbestos report is located left hand corner of each new page. The report is then broken down by:
 1. Material Type - each suspect material is identified in accordance with AHERA classification of 1 = Surfacing, 2 = Thermal insulation and 3 = Miscellaneous.
 2. Homogenous Area - The homogenous area is identified by 4 letters and a sequential number.
 3. Group Description - a general description of the homogeneous material is given by description, location, quantity, sample number, results and assessments if required.
2. Drawings show the functional spaces assigned by the accredited inspector, the sample locations and all ACM is located on drawings.

ASHERA Inspection Report
In accordance with 40 CFR 763.85(a)(4)(vi)

OWNER: ASARCO INCORPORATED
BUILDING NAME: POWER HOUSE BUILDING
BUILDING NUMBER: PH

Inspector: J
Inspection

Accreditation: 466-25-3063

Summary: SURVEY PERTAINS TO UNITS 7,6,5,4,2 AND CIRCUIT PUMP # 3
LOCATED IN THE BASEMENT FLOOR OF THE POWER HOUSE BUILDING.

Page No. 1

POWER HOUSE BUILDING

Date: 10/31/97

ASBESTOS CONTAINING AREAS

2. Thermal Materials

ELBO 01 Building No. PH
Description: SMALL PIPE FITTING INSULATION

LOCATION(s): THROUGHOUT UNIT # 6 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 EA
Sample No(s): FL1021U6-09
Result: CHRYSOTILE 5-10%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Severe Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

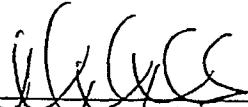
LOCATION(s): THROUGHOUT UNIT # 6 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 EA
Sample No(s): FL1021U6-08
Result: CHRYSOTILE 10-15%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Severe Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.



Signature of Inspector

Sun City Analytical

ASBESTOS CONTAINING AREAS

LOCATION(s): THROUGHOUT UNIT # 6 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 EA
Sample No(s): FL1021U6-07
Result: CHRYSOTILE 5-10%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Severe Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

ELBO 02

Building No. PH
Description: LARGE PIPE FITTING INSULATION

LOCATION(s): THROUGHOUT UNIT # 6 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 EA
Sample No(s): FL1021U6-10
Result: CHRY. 5-10% AMOSITE 15-20%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Severe Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

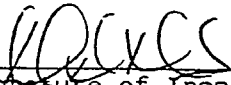
LOCATION(s): THROUGHOUT UNIT # 6 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 EA
Sample No(s): FL1021U6-11
Result: CHRY. 5-10% AMOSITE 10-15%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Severe Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.



Signature of Inspector

Sun City Analytical

ASBESTOS CONTAINING AREAS

LOCATION(s): THROUGHOUT UNIT # 6 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 EA
Sample No(s): FL1021U6-12
Result: CHRY. 5-7% AMOSITE 7-12%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Severe Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

ELBO 03 Building No.PH
Description: PIPE FITTING INSULATION

LOCATION(s): THROUGHOUT UNIT # 2 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 EA
Sample No(s): FL1021U2-01
Result: CHRYSOTILE 5-10%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Minor Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

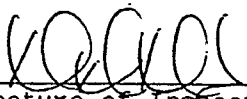
LOCATION(s): THROUGHOUT UNIT # 2 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 EA
Sample No(s): FL1021U2-02
Result: CHRYSOTILE 7-12%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Minor Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.



Signature of Inspector

Sun City Analytical

ASBESTOS CONTAINING AREAS

LOCATION(s): THROUGHOUT UNIT # 2 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 EA
Sample No(s): FL1021U2-03
Result: CHRYSOTILE 5-10%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Minor Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

ELBO 04

Building No.PH
Description: SMALL PIPE FITTING INSULATION

LOCATION(s): THROUGHOUT UNIT # 4 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 LF
Sample No(s): FL1021U4-02
Result: CHRYSOTILE 30-35%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Minor Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

LOCATION(s): THROUGHOUT UNIT # 4 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 LF
Sample No(s): FL1021U4-01
Result: CHRYSOTILE 35-40%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Minor Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.



Signature of Inspector

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ASBESTOS CONTAINING AREAS

LOCATION(s): THROUGHOUT UNIT # 4 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 LF
Sample No(s): FL1021U4-03
Result: CHRYSOTILE 35-40%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Minor Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

ELBO 05 Building No.PH
Description: LARGE PIPE FITTING INSULATION

LOCATION(s): THROUGHOUT UNIT # 4 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 LF
Sample No(s): FL1021U4-04
Result: CHRYSOTILE 7-12%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Minor Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

LOCATION(s): THROUGHOUT UNIT # 4 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 LF
Sample No(s): FL1021U4-06
Result: CHRYSOTILE 10-15%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Minor Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.



Signature of Inspector

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ASBESTOS CONTAINING AREAS

LOCATION(s): THROUGHOUT UNIT # 4 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 LF
Sample No(s): FL1021U4-05
Result: CHRYSOTILE 15-20%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Minor Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

ELBO 06 Building No.PH
Description: PIPE FITTING INSULATION

LOCATION(s): THROUGHOUT CIRCUIT PUMP # 3 (SEE
DRAWINGS FOR QUANTITIES)

Quantity: 0 EA
Sample No(s): FL1021P3-01
Result: CHRYSOTILE 15-20%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Minor Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

ELBO 07 Building No.PH
Description: SMALL PIPE FITTING INSULATION

LOCATION(s): THROUGHOUT UNIT # 5 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 EA
Sample No(s): FL1021U5-01
Result: CHRYSOTILE 15-20%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Minor Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.



Signature of Inspector

Sun City Analytical

ASBESTOS CONTAINING AREAS

LOCATION(s): THROUGHOUT UNIT # 5 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 EA
Sample No(s): FL1021U5-03
Result: CHRYSOTILE 10-15%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Minor Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

LOCATION(s): THROUGHOUT UNIT # 5 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 EA
Sample No(s): FL1021U5-02
Result: CHRYSOTILE 15-20%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Minor Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

PIPE 01 Building No. PH
Description: SMALL PIPE INSULATION

LOCATION(s): THROUGHOUT UNIT # 6 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 LF
Sample No(s): FL1021U6-02
Result: AMOSITE 10-15%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Severe Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.



Signature of Inspector

Sun City Analytical

ASBESTOS CONTAINING AREAS

LOCATION(s): THROUGHOUT UNIT # 6 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 LF
Sample No(s): FL1021U6-01
Result: AMOSITE 10-15%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Severe Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

LOCATION(s): THROUGHOUT UNIT # 6 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 LF
Sample No(s): FL1021U6-03
Result: AMOSITE 15-20%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Severe Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

PIPE 02 Building No. PH
Description: LARGE PIPE INSULATION

LOCATION(s): THROUGHOUT UNIT # 6 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 LF
Sample No(s): FL1021U6-04
Result: CHRY. 2-7% AMOSITE 10-15%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Severe Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.



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ASBESTOS CONTAINING AREAS

LOCATION(s): THROUGHOUT UNIT # 6 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 LF
Sample No(s): FL1021U6-06
Result: CHRY. 5-7% AMOSITE 10-15%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Severe Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

LOCATION(s): THROUGHOUT UNIT # 6 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 LF
Sample No(s): FL1021U6-05
Result: CHRY. 2-5% AMOSITE 7-12%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Severe Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

PIPE 03 Building No.PH
Description: PIPE INSULATION (AIRCELL)

LOCATION(s): THROUGHOUT UNIT # 2 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 LF
Sample No(s): FL1021U2-04
Result: CHRYSOTILE 30-35%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Minor Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

PIPE 08 Building No.PH
Description: PIPE INSULATION



Signature of Inspector

Sun City Analytical

ASBESTOS CONTAINING AREAS

LOCATION(s): THROUGHOUT UNIT # 5 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 LF
Sample No(s): FL1021U5-07
Result: CHRYSOTILE 20-25%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Minor Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

LOCATION(s): THROUGHOUT UNIT # 5 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 LF
Sample No(s): FL1021U5-08
Result: CHRYSOTILE 25-30%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Minor Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.

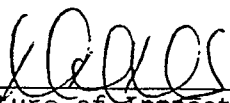
LOCATION(s): THROUGHOUT UNIT # 5 (SEE DRAWINGS
FOR QUANTITIES)

Quantity: 0 LF
Sample No(s): FL1021U5-09
Result: CHRYSOTILE 20-25%

EVALUATION FACTORS:

Accessible to all building occupants.
Potential for disturbance is probable.

Damage - Deterioration (aging)
Severity - Minor Damage
Assessment - Damaged or significantly damaged
thermal insulation materials.



Signature of Inspector

Sun City Analytical

1
AHERA Inspection Report
In accordance with 40 CFR 763.85(a)(4)(vi)

OWNER: ASARCO INCORPORATED
BUILDING NAME: POWER HOUSE BUILDING
BUILDING NUMBER: PH

Inspector:
Inspection

Accreditation: 466-25-3063

Summary: SURVEY PERTAINS TO UNITS 7.6.5.4.2 AND CIRCUIT PUMP # 3
LOCATED IN THE BASEMENT FLOOR OF THE POWER HOUSE BUILDING.

Page No. 1

POWER HOUSE BUILDING

Date: 10/31/97

NON-ASBESTOS CONTAINING AREAS

2. Thermal Materials

ELBO 08 Building No. PH
Description: LARGE PIPE FITTING INSULATION

Location(s): THROUGHOUT UNIT # 5
Quantity: 0 EA
Sample No(s): FL1021U5-06

Result: NONE DETECTED

Location(s): THROUGHOUT UNIT # 5
Quantity: 0 EA
Sample No(s): FL1021U5-05

Result: NONE DETECTED

Location(s): THROUGHOUT UNIT # 5
Quantity: 0 EA
Sample No(s): FL1021U5-04

Result: NONE DETECTED

FLUE 01 Building No. PH
Description: FLUE INSULATION

Location(s): THROUGHOUT UNIT # 4
Quantity: 0 SF
Sample No(s): FL1021U4-07

Result: NONE DETECTED

FLUE 02 Building No. PH
Description: FLUE INSULATION


Signature of Inspector

Sun City Analytical

NON-ASBESTOS CONTAINING AREAS

Location(s): THROUGHOUT UNIT # 4
Quantity: 0 SF
Sample No(s): FL1021U4-09

Result: NONE DETECTED

PIPE 04

Building No.PH
Description: PIPE INSULATION

Location(s): THROUGHOUT UNIT # 2
Quantity: 0 LF
Sample No(s): FL1021U2-05

Result: NONE DETECTED

PIPE 05

Building No.PH
Description: PIPE INSULATION

Location(s): THROUGHOUT UNIT # 2
Quantity: 0 LF
Sample No(s): FL1021U2-06

Result: NONE DETECTED

PIPE 06

Building No.PH
Description: PIPE INSULATION

Location(s): THROUGHOUT UNIT # 4
Quantity: 0 LF
Sample No(s): FL1021U4-08

Result: NONE DETECTED

PIPE 07

Building No.PH
Description: PIPE INSULATION

Location(s): THROUGHOUT CIRCUIT PUMP # 3
Quantity: 0 LF
Sample No(s): FL1021P3-02

Result: NONE DETECTED

PIPE 09

Building No.PH
Description: PIPE INSULATION

Location(s): THROUGHOUT UNIT # 5
Quantity: 0 LF
Sample No(s): FL1021U5-10

Result: NONE DETECTED



Signature of Inspector

Sun City Analytical

Page No. 3

POWER HOUSE BUILDING

Date: 10/31/97

NON-ASBESTOS CONTAINING AREAS

Location(s): THROUGHOUT UNIT # 5

Quantity: 0 LF

Sample No(s): FL1021U5-11

Result: NONE DETECTED

Location(s): THROUGHOUT UNIT # 5

Quantity: 0 LF

Sample No(s): FL1021U5-12

Result: NONE DETECTED

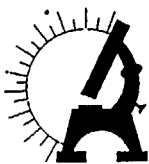


Signature of Inspector

Sun City Analytical

LABORATORY
RESULTS

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Sun
City
Analytical
Inc.

October 22, 1997

Asarco Incorporated
P.O. Box 1111
El Paso, Texas 79999

ATTENTION: Peggy Munsell

RE: Unit #6

LAB NO#	SAMPLE NUMBER	DESCRIPTION	MATRIX	FIBROUS	ASBESTIFORM
B97-7170	FL1021U6-01	White Friable Small pipe	Calcium carbonate	Cellulose trace	Amosite 10-15%
B97-7171	FL1021U6-02	White Friable Small pipe	Calcium carbonate	None Detected	Amosite 10-15%
B97-7172	FL1021U6-03	White Friable Small pipe	Calcium carbonate	None Detected	Amosite 15-20%
B97-7173	FL1021U6-04	Gray Friable Large pipe	Calcium carbonate Gypsum	Cellulose 1-3%	Amosite 10-15% Chrysotile 2-7%
B97-7174	FL1021U6-05	Gray Friable Large pipe	Calcium carbonate Gypsum	Cellulose trace	Amosite 7-12% Chrysotile 2-5%
B97-7175	FL1021U6-06	Gray Friable Large pipe	Calcium carbonate Gypsum	Cellulose trace	Amosite 10-15% Chrysotile 5-7%
B97-7176	FL1021U6-07	Brown, Black Friable Small elbow	Calcium carbonate	Mineral wool 1-5% Glass fibers 10-15%	Chrysotile 5-10%
B97-7177	FL1021U6-08	Brown, Black Friable Small elbow	Calcium carbonate	Mineral wool 1-5% Glass fibers 15-20%	Chrysotile 10-15%
B97-7178	FL1021U6-09	Brown, Black Friable Small elbow	Calcium carbonate	Mineral wool 5-10% Glass fibers 10-15%	Chrysotile 5-10%

Rosalva Gomez

Rosalva Gomez
MICROSCOPIST

Method: EPA-600/M4-82-020 "Interim Method for the Determination of Asbestos in Bulk Insulation Samples;"
EPA/600/R-93/116 "Method for the Determination of Asbestos in Bulk Building Materials," July 1993. Assigned percentages are based on visual volume procedures and chart aides, corresponding to an approximate standard error of + or - 5% for (1-10% range) and + or - 10% for (11-90% range). All microscopists are graduates of McCrone Research Institute's "Microscopical Identification of Asbestos", Chicago, Ill or equivalent. National Voluntary Laboratory Accreditation Program (NVLAP) Lab ID 101870-0.

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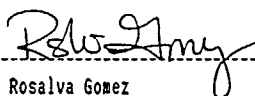
ASARCO ELP 0015157

Asarco Incorporated
P.O. Box 1111
El Paso, Texas 79999

ATTENTION: Peggy Munsell

RE: Unit #6

LAB NO#	SAMPLE NUMBER	DESCRIPTION	MATRIX	FIBROUS	ASBESTIFORM
B97-7179	FL1021U6-10	White Friable Large elbow	Calcium carbonate	None Detected	Chrysotile 5-10% Amosite 15-20%
B97-7180	FL1021U6-11	White Friable Large elbow	Calcium carbonate	Cellulose trace	Chrysotile 5-10% Amosite 10-15%
B97-7181	FL1021U6-12	White Friable Large elbow	Calcium carbonate	Cellulose trace	Chrysotile 5-7% Amosite 7-12%



Rosalva Gomez
MICROSCOPIST

Method: EPA-600/M4-82-020 "Interim Method for the Determination of Asbestos in Bulk Insulation Samples;"
EPA/600/R-93/116 "Method for the Determination of Asbestos in Bulk Building Materials," July 1993. Assigned percentages are based on visual volume procedures and chart aides, corresponding to an approximate standard error of + or - 5% for (1-10% range) and + or - 10% for (11-90% range). All microscopists are graduates of McCrone Research Institute's "Microscopical Identification of Asbestos", Chicago, Ill or equivalent. National Voluntary Laboratory Accreditation Program (NVLAP) Lab ID 101870-0.

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Sun
City
Analytical
Inc.

October 22, 1997

Asarco Incorporated
P.O. Box 1111
El Paso, Texas 79999

ATTENTION: Peggy Munsell

RE: Unit #5

LAB NO#	SAMPLE NUMBER	DESCRIPTION	MATRIX	FIBROUS	ASBESTIFORM
B97-7182	FL1021U5-01	Tan Friable Small fitting	Calcium carbonate	Mineral wool 10-15% Glass fibers 10-15%	Chrysotile 15-20%
B97-7183	FL1021U5-02	Tan Friable Small fitting	Calcium carbonate	Mineral wool 10-15% Glass fibers 5-10%	Chrysotile 15-20%
B97-7184	FL1021U5-03	Tan Friable Small fitting	Calcium carbonate	Mineral wool 5-10% Glass fibers 1-5%	Chrysotile 10-15%
B97-7185	FL1021U5-04	Beige Friable Large elbow fitting	Calcium carbonate Quartz	Mineral wool 5-10% Glass fibers 10-15% Cellulose 5-10%	None Detected
B97-7186	FL1021U5-05	Beige Friable Large elbow fitting	Calcium carbonate Quartz	Mineral wool 1-5% Glass fibers 5-10% Cellulose 5-10%	None Detected
B97-7187	FL1021U5-06	Beige Friable Large elbow fitting	Calcium carbonate Quartz	Mineral wool 5-10% Glass fibers 10-15% Cellulose 10-15%	None Detected
B97-7188	FL1021U5-07	Brown Friable Pipe insulation	Calcium carbonate	Mineral wool 1-5% Glass fibers 1-5%	Chrysotile 20-25%
B97-7189	FL1021U5-08	Brown Friable Pipe insulation	Calcium carbonate	Mineral wool 5-10% Glass fibers 1-5%	Chrysotile 25-30%
B97-7190	FL1021U5-09	Brown Friable Pipe insulation	Calcium carbonate	Mineral wool 1-5% Glass fibers trace	Chrysotile 20-25%


Rosalva Gomez
MICROSCOPIST

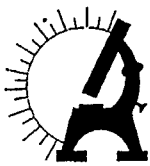
Method: EPA-600/M4-82-020 "Interim Method for the Determination of Asbestos in Bulk Insulation Samples;"
EPA/600/R-93/116 "Method for the Determination of Asbestos in Bulk Building Materials," July 1993. Assigned percentages are based on visual volume procedures and chart aides, corresponding to an approximate standard error of + or - 5% for (1-10% range) and + or - 10% for (11-90% range). All microscopists are graduates of McCrone Research Institute's "Microscopical Identification of Asbestos", Chicago, Ill or equivalent. National Voluntary Laboratory Accreditation Program (NVLAP) Lab ID 101870-0.

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ASARCO ELP 0015150



Sun
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October 22, 1997

Asarco Incorporated
P.O. Box 1111
El Paso, Texas 79999

ATTENTION: Peggy Munsell

RE: Unit #5

LAB NO#	SAMPLE NUMBER	DESCRIPTION	MATRIX	FIBROUS	ASBESTIFORM
B97-7208	FL1021U5-10	Gray, White Friable Pipe insulation	Calcium carbonate Quartz	Mineral wool 10-15% Glass fibers 5-10% Cellulose 5-10%	None Detected
B97-7209	FL1021U5-11	Gray, White Friable Pipe insulation	Calcium carbonate Quartz	Mineral wool 5-10% Glass fibers 15-20% Cellulose 1-5%	None Detected
B97-7210	FL1021U5-12	Gray, White Friable Pipe insulation	Calcium carbonate Quartz	Mineral wool 10-15% Glass fibers 10-15% Cellulose 5-10%	None Detected

Rosalva Gomez

Rosalva Gomez
MICROSCOPIST

Method: EPA-600/M4-82-020 "Interim Method for the Determination of Asbestos in Bulk Insulation Samples;"
EPA/600/R-93/116 "Method for the Determination of Asbestos in Bulk Building Materials," July 1993. Assigned percentages are based on visual volume procedures and chart aides, corresponding to an approximate standard error of + or - 5% for (1-10% range) and + or - 10% for (11-90% range). All microscopists are graduates of McCrone Research Institute's "Microscopical Identification of Asbestos", Chicago, Ill or equivalent. National Voluntary Laboratory Accreditation Program (NVLAP) Lab ID 101870-0.

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ASARCO FIP 0015160



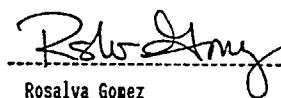
October 22, 1997

Asarco Incorporated
P.O. Box 1111
El Paso, Texas 79999

ATTENTION: Peggy Munsell

RE: Unit #4

LAB NO#	SAMPLE NUMBER	DESCRIPTION	MATRIX	FIBROUS	ASBESTIFORM
B97-7191	FL1021U4-01	White, Tan Friable Small fitting	Binder	Mineral wool trace Glass fibers 1-3%	Chrysotile 35-40%
B97-7192	FL1021U4-02	White, Tan Friable Small fitting	Binder	Mineral wool 1-3% Glass fibers 1-5%	Chrysotile 30-35%
B97-7193	FL1021U4-03	White, Tan Friable Small fitting	Binder	Mineral wool trace Glass fibers 1-5%	Chrysotile 35-40%
B97-7194	FL1021U4-04	Gray, Black Friable Large fitting	Calcium carbonate	Mineral wool 1-3% Glass fibers 1-5% Cellulose 1-3%	Chrysotile 7-12%
B97-7195	FL1021U4-05	Gray, Black Friable Large fitting	Calcium carbonate	Mineral wool trace Glass fibers 1-5% Cellulose 1-5%	Chrysotile 15-20%
B97-7196	FL1021U4-06	Gray, Black Friable Large fitting	Calcium carbonate	Mineral wool 5-10% Glass fibers 5-10% Cellulose 1-3%	Chrysotile 10-15%
B97-7197	FL1021U4-07	Brown, Yellow Friable Wrap	Binder	Cellulose 70-75%	None Detected
B97-7198	FL1021U4-08	Black Friable Pipe insulation	Binder	Mineral wool 20-25% Glass fibers 60-65%	None Detected
B97-7199	FL1021U4-09	Yellow, Black Friable Flue insulation	Binder	Mineral wool 5-10% Glass fibers 65-70%	None Detected


Rosalva Gomez
MICROSCOPIST

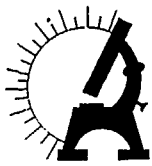
Method: EPA-600/M4-82-020 "Interim Method for the Determination of Asbestos in Bulk Insulation Samples;"
EPA/600/R-93/116 "Method for the Determination of Asbestos in Bulk Building Materials," July 1993. Assigned percentages are based on visual volume procedures and chart aides, corresponding to an approximate standard error of + or - 5% for (1-10% range) and + or - 10% for (11-90% range). All microscopists are graduates of McCrone Research Institute's "Microscopical Identification of Asbestos", Chicago, Ill or equivalent. National Voluntary Laboratory Accreditation Program (NVLAP) Lab ID 101870-0.

Corporate Offices
1409 Montana Avenue
El Paso, Texas 79902
(915) 533-8840
Fax (915) 533-8843

516 Chama N.E. Suite D
Albuquerque, New Mexico 87108
(505) 255-4673
Fax (505) 255-0989

2817 John Ben Shepard Pkwy
Building A, Suite 201
Odessa, Texas 79762
(915) 362-9887
Fax (915) 367-6904

ASARCO ELP 0015161



Sun
City
Analytical
Inc.

October 22, 1997

Asarco Incorporated
P.O. Box 1111
El Paso, Texas 79999

ATTENTION: Peggy Munsell

RE: Unit #2

LAB NO#	SAMPLE NUMBER	DESCRIPTION	MATRIX	FIBROUS	ASBESTIFORM
B97-7200	FL1021U2-01	Brown Friable Small fitting	Calcium carbonate	Mineral wool 10-15% Glass fibers 10-15%	Chrysotile 5-10%
B97-7201	FL1021U2-02	Brown Friable Small fitting	Calcium carbonate	Mineral wool 15-20% Glass fibers 10-15%	Chrysotile 7-12%
B97-7202	FL1021U2-03	Brown Friable Small fitting	Calcium carbonate	Mineral wool 5-10% Glass fibers 15-20%	Chrysotile 5-10%
B97-7203	FL1021U2-04	White, Tan Friable Pipe insulation	Binder	Cellulose 5-10%	Chrysotile 30-35%
B97-7204	FL1021U2-05	White Friable Pipe insulation	Calcium carbonate	Glass fibers 10-15% Cellulose 10-15%	None Detected
B97-7205	FL1021U2-06	Black Friable Pipe insulation	Binder	Mineral wool 10-15% Glass fibers 50-55%	None Detected

Rosalva Gomez

Rosalva Gomez
MICROSCOPIST

Method: EPA-600/M4-82-020 "Interim Method for the Determination of Asbestos in Bulk Insulation Samples;"
EPA/600/R-93/116 "Method for the Determination of Asbestos in Bulk Building Materials," July 1993. Assigned percentages are based on visual volume procedures and chart aides, corresponding to an approximate standard error of + or - 5% for (1-10% range) and + or - 10% for (11-90% range). All microscopists are graduates of McCrone Research Institute's "Microscopical Identification of Asbestos", Chicago, Ill or equivalent. National Voluntary Laboratory Accreditation Program (NVLAP) Lab ID 101870-0.

Corporate Offices
1409 Montana Avenue
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Fax (505) 255-0989

2817 John Ben Shepard Pkwy
Building A, Suite 201
Odessa, Texas 79762
(915) 362-9887
Fax (915) 367-6904

ASARCO ELP 0015162



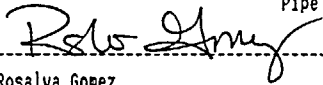
October 22, 1997

Asarco Incorporated
P.O. Box 1111
El Paso, Texas 79999

ATTENTION: Peggy Munsell

RE: Pump #3

LAB NO#	SAMPLE NUMBER	DESCRIPTION	MATRIX	FIBROUS	ASBESTIFORM
B97-7206	FL1021P3-01	Tan Friable Fitting	Calcium carbonate	Cellulose 1-5%	Chrysotile 15-20%
B97-7207	FL1021P3-02	Tan, Black Friable Pipe insulation	Calcium carbonate Quartz	Mineral wool 10-15% Glass fibers 20-25% Cellulose 1-5%	None Detected


Rosalva Gomez
MICROSCOPIST

Method: EPA-600/M4-82-020 "Interim Method for the Determination of Asbestos in Bulk Insulation Samples;"
EPA/600/R-93/116 "Method for the Determination of Asbestos in Bulk Building Materials," July 1993. Assigned percentages are based on visual volume procedures and chart aides, corresponding to an approximate standard error of + or - 5% for (1-10% range) and + or - 10% for (11-90% range). All microscopists are graduates of McCrone Research Institute's "Microscopical Identification of Asbestos", Chicago, Ill or equivalent. National Voluntary Laboratory Accreditation Program (NVLAP) Lab ID 101870-0.

Corporate Offices
1409 Montana Avenue
El Paso, Texas 79902
(915) 533-8840
Fax (915) 533-8843

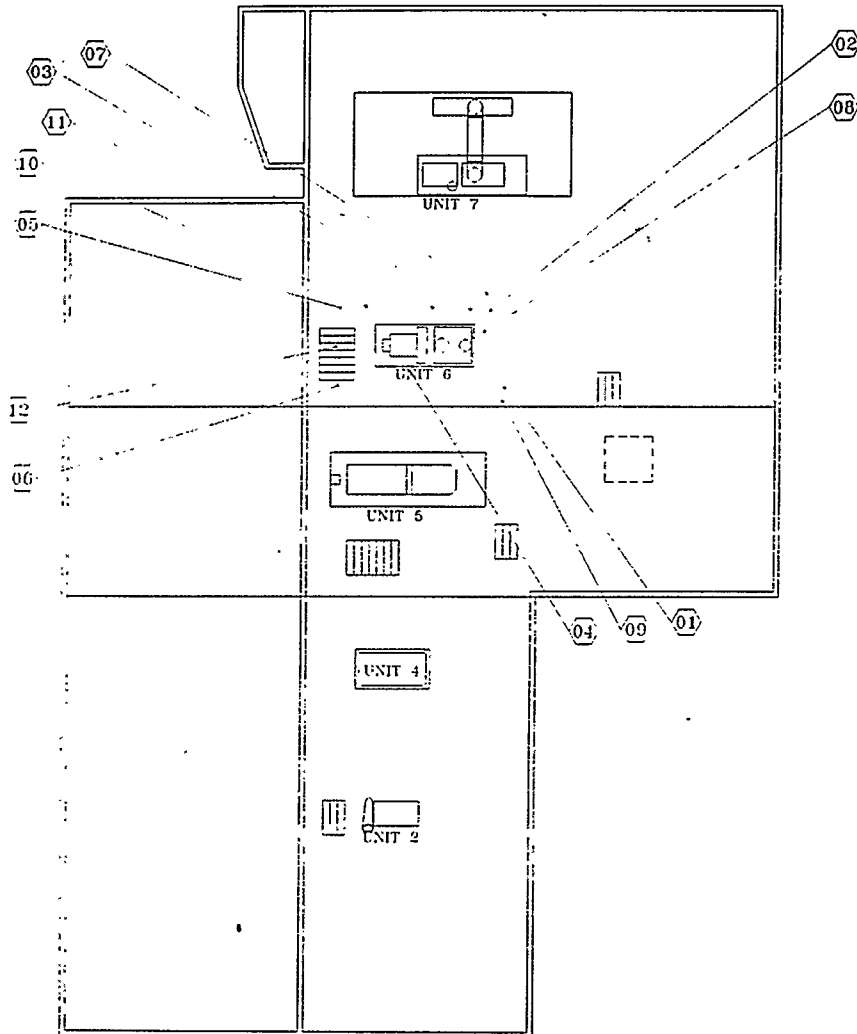
516 Chama N.E. Suite D
Albuquerque, New Mexico 87108
(505) 255-4673
Fax (505) 255-0989

2817 John Ben Shepard Pkwy
Building A, Suite 201
Odessa, Texas 79762
(915) 362-9887
Fax (915) 367-6904

ASARCO ELP 0015163

DRAWINGS

INSPECTION DATA SERIES FL1021U6-



ASARCO POWER HOUSE
BASEMENT FLOOR
NOT TO SCALE



LEGEND

BULK SAMPLE
NUMBER AND
LOCATION

Designed By
**Sun City
Analytical Inc.**
Environmental Services

1409 Montano Ave.
El Paso, Texas 79902
(915) 533-8840 fax (915) 533-8843

WORK DESCRIPTION:
ASBESTOS INSPECTION

PROJECT NUMBER:
97245

ACAD TITLE
.. \RG\ASARC-PP

DRAWN BY:
RG

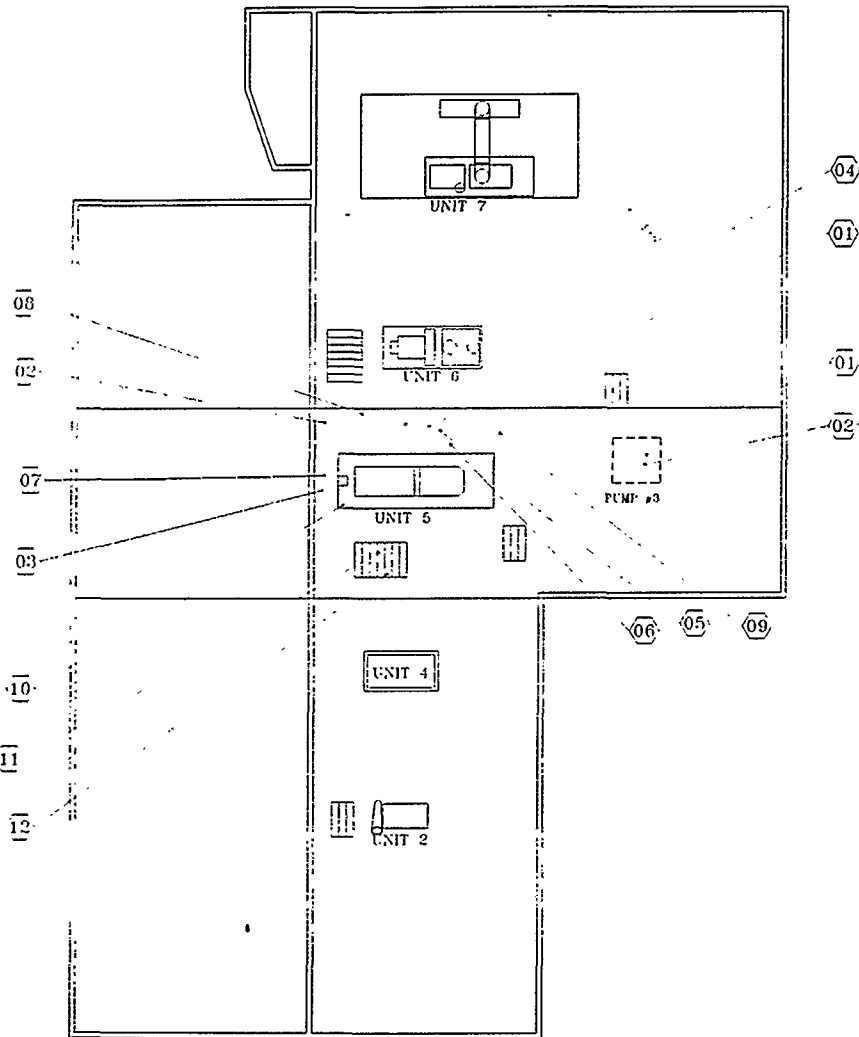
INSPECTOR:
MM

DATE:
10/97

ASARCO ELP 0015165

INSPECTION DATA

SERIES FL1021U5-
FL1021P3-



ASARCO POWER HOUSE
BASEMENT FLOOR
NOT TO SCALE



LEGEND

BULK SAMPLE
NUMBER AND
LOCATION

Designed By:
**Sun City
Analytical Inc.**
Environmental Services

1409 Montana Ave.
El Paso, Texas 79902
(915) 533-0840 fax (915) 533-8843

WORK DESCRIPTION
ASBESTOS INSPECTION

PROJECT NUMBER
97245

ACAD TITLE
.. \ RG \ ASARC-PP

DRAWN BY:
RG

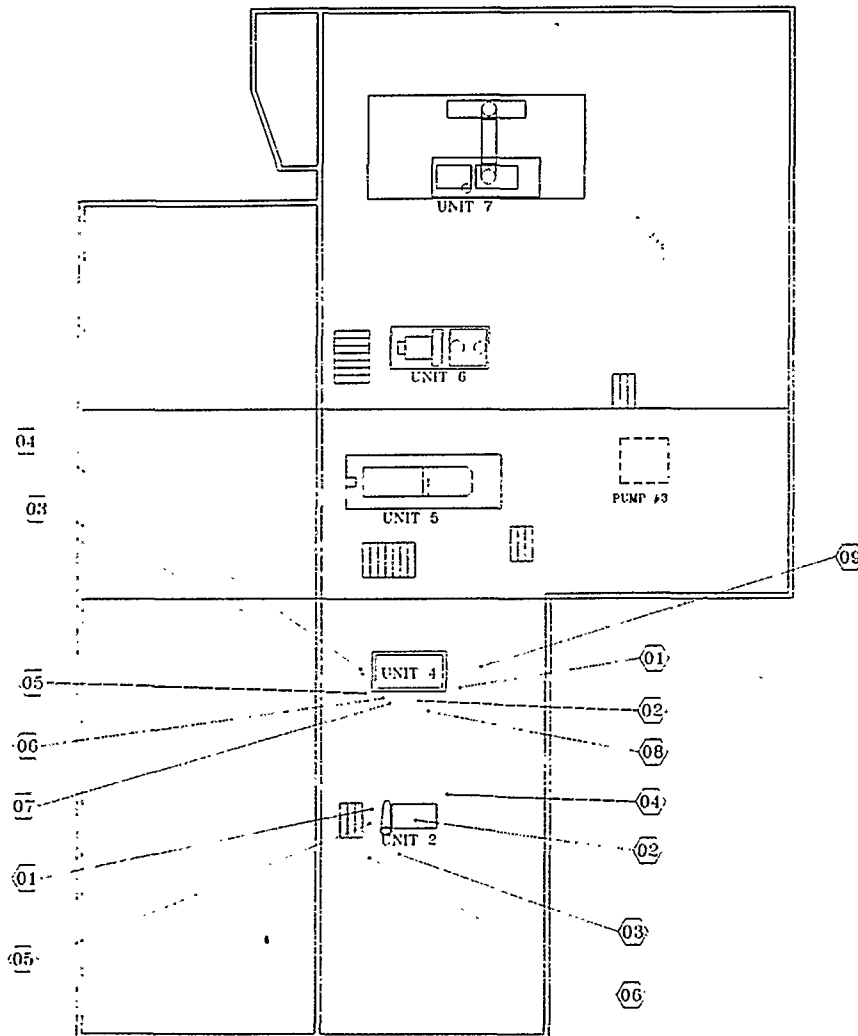
INSPECTOR
MM

DATE
10/97

ASARCO ELP 0015166

INSPECTION DATA

SERIES FL1021U4-
FL1021U2-



ASARCO POWER HOUSE
BASEMENT FLOOR
NOT TO SCALE



Designed By
A Sun City
Analytical Inc.
Environmental Services
1408 Montana Ave.
El Paso, Texas 79902
(915) 533-8840 fax (915) 533-8843

WORK DESCRIPTION:
ASBESTOS INSPECTION

PROJECT NUMBER:
97245

ACAD TITLE:
.. \RG\ASARC-PP

DRAWN BY:
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INSPECTOR:
MM

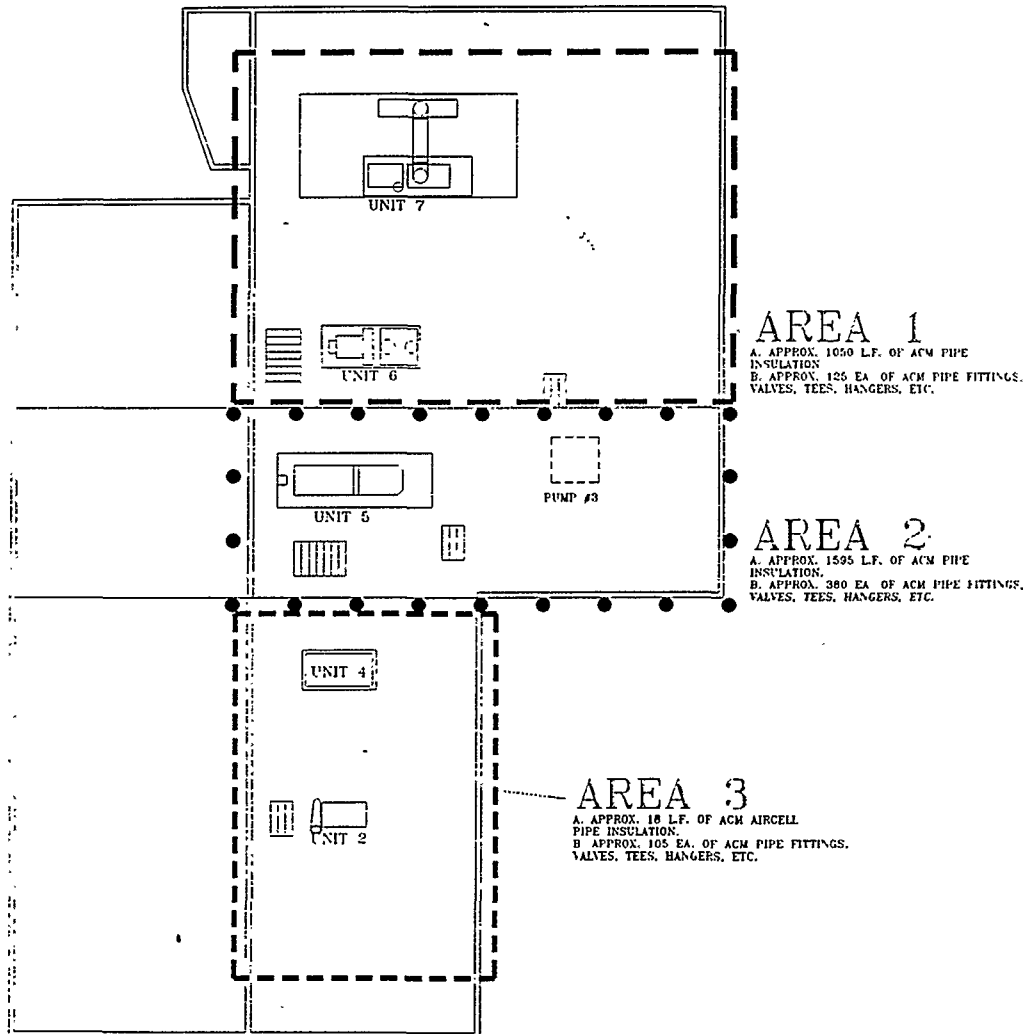
DATE:
10/97

LEGEND

BULK SAMPLE
NUMBER AND
LOCATION

ASARCO ELP 0015167

ACM AREAS



ASARCO POWER HOUSE
 BASEMENT FLOOR
 NOT TO SCALE



LEGEND

Designed By
A Sun City
 Analytical Inc.
 Environmental Services
 1408 Montana Ave.
 El Paso, Texas 79902
 (915) 533-8840 fax (915) 533-8843

WORK DESCRIPTION
ASBESTOS INSPECTION

PROJECT NUMBER
97245

ACAD TITLE
.. \RG\ASARC-PP

DRAWN BY
RG

INSPECTOR
MM

DATE
10/97

ASARCO ELP 0015168

INVENTORY OF ROM &
NESTAP CLASSIFICATION

ACM Inventory and
NESHAPS Classification
of ACM Encounter at
the Power House on Units 7,6,5,4 & 2

Sample Number & Material Type	Sample location / Functional space	Description	NESHAP Classification	Quantity	ACM Type
FL1021U6-01 PIPE 01	UNIT 6	small pipe insulation	RACM	SEE DRAWINGS	Friable
FL1021U6-02 PIPE 01	UNIT 6	small pipe insulation	RACM	SEE DRAWINGS	Friable
FL1021U6-03 PIPE 01	UNIT 6	small pipe insulation	RACM	SEE DRAWINGS	Friable
FL1021U6-04 PIPE 02	UNIT 6	large pipe insulation	RACM	SEE DRAWINGS	Friable
FL1021U6-05 PIPE 02	UNIT 6	large pipe insulation	RACM	SEE DRAWINGS	Friable
FL1021U6-06 PIPE 02	UNIT 6	large pipe insulation	RACM	SEE DRAWINGS	Friable
FL1021U6-07 ELBO 01	UNIT 6	small elbows	RACM	SEE DRAWINGS	Friable
FL1021U6-08 ELBO 01	UNIT 6	small elbows	RACM	SEE DRAWINGS	Friable
FL1021U6-09 ELBO 01	UNIT 6	small elbows	RACM	SEE DRAWINGS	Friable
FL1021U6-10 ELBO 02	UNIT 6	large elbows	RACM	SEE DRAWINGS	Friable
FL1021U6-11 ELBO 02	UNIT 6	large elbows	RACM	SEE DRAWINGS	Friable
FL1021U6-12 ELBO 02	UNIT 6	large elbows	RACM	SEE DRAWINGS	Friable

ACM Inventory and
NESHAPS Classification
of ACM Encounter at
the Power House on Units 7,6,5,4 & 2

Sample Number & Material Type	Sample location / Functional space	Description	NESHAP Classification	Quantity	ACM Type
FL1021U5-01 ELBO 01	UNIT 5	small fitting insulation	RACM	SEE DRAWINGS	Friable
FL1021U5-02 ELBO 01	UNIT 5	small fitting insulation	RACM	SEE DRAWINGS	Friable
FL1021U5-03 ELBO 01	UNIT 5	small fitting insulation	RACM	SEE DRAWINGS	Friable
FL1021U5-07 PIPE 01	UNIT 5	pipe insulation	RACM	SEE DRAWINGS	Friable
FL1021U5-08 PIPE 01	UNIT 5	pipe insulation	RACM	SEE DRAWINGS	Friable
FL1021U5-09 PIPE 01	UNIT 5	pipe insulation	RACM	SEE DRAWINGS	Friable

ACM Inventory and
NESHAPS Classification
of ACM Encounter at
the Power House on Units 7,6,5,4 & 2

Sample Number & Material Type	Sample location / Functional space	Description	NESHAP Classification	Quantity	ACM Type
FL1021U4-01 ELBO 01	UNIT-4	small fitting insulation	RACM	SEE DRAWINGS	Friable
FL1021U4-02 ELBO 01	UNIT 4	small fitting insulation	RACM	SEE DRAWINGS	Friable
FL1021U4-03 ELBO 01	UNIT 4	small fitting insulation	RACM	SEE DRAWINGS	Friable
FL1021U4-04 ELBO 02	UNIT 4	large fitting insulation	RACM	SEE DRAWINGS	Friable
FL1021U4-05 ELBO 02	UNIT 4	large fitting insulation	RACM	SEE DRAWINGS	Friable
FL1021U4-06 ELBO 02	UNIT 4	large fitting insulation	RACM	SEE DRAWINGS	Friable

ACM Inventory and
NESHAPS Classification
of ACM Encounter at
the Power House on Units 7,6,5,4 & 2

Sample Number & Material Type	Sample location / Functional space	Description	NESHAP Classification	Quantity	ACM Type
FL1021P3-01 ELBO 01	CIRCUIT PUMP 3	fitting insulation	RACM	SEE DRAWINGS	Friable

ACM Inventory and
NESHAPS Classification
of ACM Encounter at
the Power House on Units 7,6,5,4 & 2

Sample Number & Material Type	Sample location / Functional space	Description	NESHAP Classification	Quantity	ACM Type
FL1021U2-01 ELBO 01	UNIT 2	pipe fitting insulation	RACM	SEE DRAWINGS	Friable
FL1021U2-02 ELBO 01	UNIT 2	pipe fitting insulation	RACM	SEE DRAWINGS	Friable
FL1021U2-03 ELBO 01	UNIT 2	pipe fitting insulation	RACM	SEE DRAWINGS	Friable
FL1021U2-04 PIPE 01	UNIT 2	pipe insulation	RACM	SEE DRAWINGS	Friable

40 CFR 61 NESHAP Classification of Asbestos:

Category I Nonfriable asbestos-containing material (ACM):

means asbestos-containing packing, gaskets, resilient floor covering, and asphalt roofing products containing more than one percent asbestos as determined by polarized light microscopy (PLM).

Category II Nonfriable ACM:

means any material excluding Category I nonfriable ACM containing more than one percent asbestos as determined by PLM when the material cannot be crumbled, pulverized or reduced to powder by hand pressure when dry.

Regulated Asbestos Containing Material (RACM):

means any material containing more than one percent asbestos as determined by PLM that when dry can be crumbled, pulverized or reduced to powder by hand pressure. Furthermore, if the asbestos content is less than 10% as determined by a method other than point counting by PLM method then the tester can verify the asbestos content by point counting using PLM method.

- (a) Friable asbestos material,
- (b) Category I Nonfriable ACM that has become friable,
- (c) Category I Nonfriable ACM that will be or has been subject to sanding, grinding, cutting, or abrading.
- (d) Category II Nonfriable ACM that has high probability of becoming friable ACM.

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6/1/75

CERTIFICATIONS

TEXAS DEPARTMENT OF HEALTH

BE IT KNOWN THAT

SUN CITY ANALYTICAL, INC.

is licensed and authorized to perform as an

ASBESTOS CONSULTANT AGENCY

In the State of Texas within the purview of Texas Civil Statutes, Article 4477-3a, as amended, so long as this license is not suspended or revoked and is renewed according to the rules adopted by the Texas Board of Health.

10-0011

License Number

01/03/97

Issue Date

01/02/98

Expiration Date

This certificate is void after expiration date without a current renewal identification card displayed here.

Todd F. Wingler, P.E.
Chief, Asbestos Programs Branch
Occupational Safety and Health Division

David R. Smilli, M.D.
Commissioner of Health

VOID IF ALTERED NON-TRANSFERABLE

20093

TEXAS
DEPARTMENT OF HEALTH

BE IT KNOWN THAT
SUN CITY ANALYTICAL, INC.

is Licensed and authorized to perform as an
ASBESTOS LABORATORY
PLM PCM

in the State of Texas within the purview of Texas Civil Statutes, Article 4477-3a,
as amended, so long as this License is not suspended or revoked and is renewed
according to the rules adopted by the Texas Board of Health.

30-0011

License Number

02/25/97

Issue Date

02/24/98

Expiration Date

This certificate is void
after expiration date
without a current renewal
identification card
displayed here.

Todd F. Wingler

Todd F. Wingler, P.E.
Chief, Asbestos Programs Branch
Occupational Safety and Health Division

David R. Smith

David R. Smith, M.D.
Commissioner of Health

VOID IF ALTERED NON-TRANSFERABLE
20783

TEXAS DEPARTMENT OF HEALTH

BE IT KNOWN THAT

is Licensed and authorized to perform as an
INDIVIDUAL ASBESTOS CONSULTANT

in the State of Texas within the purview of Texas Civil Statutes, Article 4477-3a,
as amended, so long as this License is not suspended or revoked and is renewed
according to the rules adopted by the Texas Board of Health.

10-5450

License Number

05/27/97

Issue Date

05/26/98

Expiration Date

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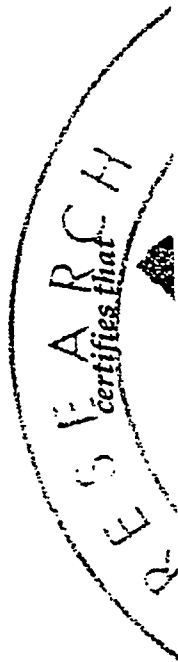
Todd F. Wingler, P.E.
Chief, Asbestos Programs Branch
Toxic Substance Control Division

Patti J. Patterson, M.D.
Commissioner of Health

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21658

McCRONE RESEARCH INSTITUTE



has successfully completed an intensive course of instruction in

Microscopical Identification of Asbestos

given by the McCrone Research Institute

Presented this 23rd day of August 1996

David A. Stringer

David A. Stringer

Course Date: August 19-23, 1996
3.5 CEU's

ASBESTOS SURVEY
Lead/Sinter/Roaster/Blast Furnace Facilities

An asbestos survey was conducted at the ASARCO Lead/Sinter/Roaster/Blast Furnace Facilities following guidelines established by 40 CFR 763, Asbestos Hazard Emergency Response Act (AHERA). The intent of the inspection is to locate and sample suspect asbestos containing material (ACM) and suspect asbestos containing building material (ACBM).

The following guidelines were used while conducting the inspection.

1. The bulk sampling was conducted by an accredited Inspector in accordance with section 206 of Title II of the Toxic Substance Control Act (TSCA), 15 U.S.C. 2601.
2. A walk through of the area was conducted before bulk sampling was performed in order to aid in the determination of possible ACM or ACBM locations.
3. The inspector visually inspected the areas to determine locations of the suspect ACM or ACBM. All sample locations were documented by the inspector.
4. When the suspected ACM or ACBM was discovered, the material was touched by the inspector to determine friability.
5. Homogeneous areas, defined by the type of material, were determined by the inspector.
6. For each homogeneous area, a representative sample or samples were taken by the inspector.
7. Samples were sent to an accredited laboratory and analyzed by PLM microscopy to determine the type and amount of asbestos content.

Peggy A. Munsell: AHERA Asbestos Inspector
Certificate #7ME112596Q1R006
Expiration Date: 11/25/97

f/users/peggy/pb.doc

ASBESTOS SUMMARY

Sample Number	Lab Number	Location	Description	NESHAPS Classification	Quantity	ACM Type
RST-01	L952744-5	Wedge Roaster	Gaskets	Category I	Approx. 5 sf	Non-friable
LD-06	L960213-11	Blast Furnace Fan	Gaskets	Category I	Approx. 5 sf	Non-friable
LD-07	B96-0460	Blast Furnace Stacks	Mastic	Category I	9,000 sf	Non-friable
LD-08	B96-0461	Blast Furnace Stacks	Gaskets	Category I	Approx. 20 sf	Non-friable
LD-09	L960213-12	Blast Furnace Fan	Gaskets	Category I	Approx. 5 sf	Non-friable
LD-10	B96-0462	Lead Stack Flue	Mastic	Category I	3,956 sf	Non-friable
LD-20	B97-2408	Sub Station N-6	Pipe Wrap	Category II	Unknown	Non-friable
SNT-01	L960213-14	Sinter Coarse Rolls	Gasket	Category I	Approx. 40 sf	Non-friable
SNT-02	L960213-13	Sinter Machine Hood	Gaskets	Category I	Approx. 120 sf	Non-friable
SNT-03	B96-0463	Sinter Control Room	Wall Panels	Category II	96 sf	Non-friable
SNT-04/04a	B96-0464 B97-1168	Sinter Control Room	Floor Tile/Mastic	Category I	672 sf	Non-friable
SNT-08a	B97-1766	Sinter Hot Cottrell	Gaskets	Category I	25 sf	Non-friable
SNT-12,13,14	B97-2482-2484	Sinter Plant Flue	Gaskets	Category I	5 sf	Non-friable
RVB-21	L950213-20	Old Wedge Roaster	Tar Seam Sealant	Category I	Approx. 400 sf	Non-friable
RVB-21a	B97-2406	Old Wedge Roaster	Rope Seam	RACM	40 sf	Friable

sf = square feet

NOTE: All unidentified gaskets found within the survey facility should be assumed to contain asbestos. Under ground pipes may contain asbestos.

40 CFR 61 NESHAP Classification of Asbestos:

- **Category I Nonfriable asbestos-containing material (ACM):**
means asbestos-containing packing, gaskets, resilient floor covering, and asphalt roofing products containing more than one percent asbestos as determined by polarized light microscopy (PLM).
- **Category II Nonfriable ACM:**
means any material excluding category I nonfriable ACM containing more than one percent asbestos as determined by PLM when the material cannot be crumbled, pulverized or reduced to powder by hand pressure when dry.
- **Friable asbestos material:**
means any material containing more than one percent asbestos as determined by PLM when dry can be crumbled, pulverized or reduced to powder by hand pressure. Further, if the asbestos content is less than 10% as determined by a method other than point counting by PLM then the tester must verify the asbestos content by point counting using PLM.

Laboratory:

Dixon Information, Inc.
NVLAP Code #10847
A.I.H.A Accredited Laboratory 101012

Sun City Analytical
NVLAP Code #101870-0
Asbestos Consulting Agency 10-0011
Asbestos Laboratory 30-0011

SINTER PLANT, SINTER HOT COTTRELL, D&L BAGHOUSE LEAD STACK

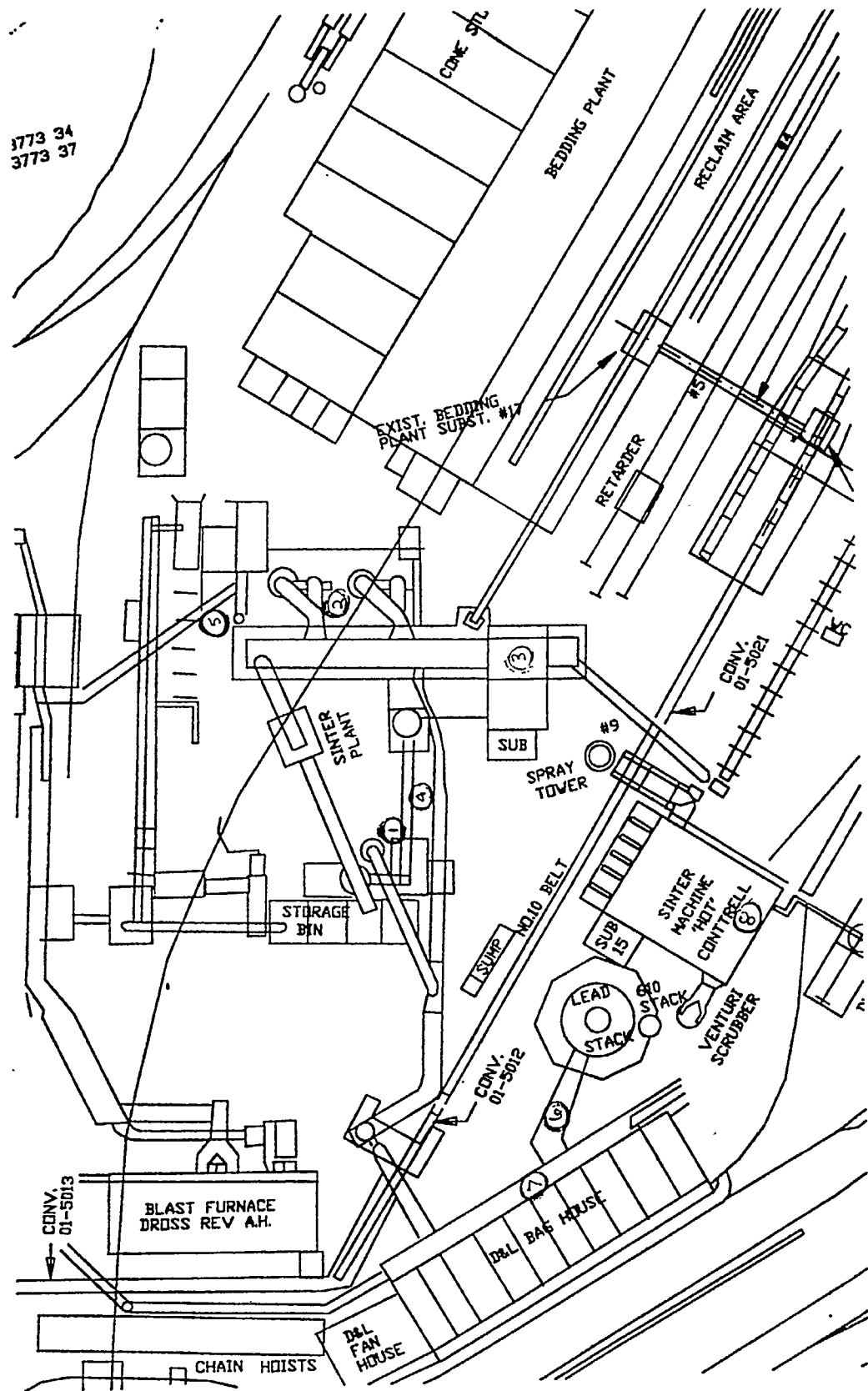
MAP LOCATION	PLANT LOCATION	PLANT/LAB NUMBER	DESCRIPTION	QUANTITY	ASBESTOS TYPE
1. Gasket	Sinter Plant	SNT-01/L960213-14	Gasket, Coarse Rolls	40 sf	70% Chrys
2. Gaskets	Sinter Plant	SNT-02/L960213-13	Gaskets, Sinter Machine Hood	Approx. 120 sf	80% Chrys
3. Sheetting	Sinter Plant	SNT-03/B96-0463	Sheetting, 4'x8' Wall Panels, Control Room	96 sf	45-50% Chrys
Tile	Sinter Plant	SNT-04/B96-0464	Tile, Floor, Control Room	672 sf	30-35% Chrys
Mastic	Sinter Plant	SNT-04a/B97-1168	Mastic, Floor, Tile, Control Room	672 sf	10-15% Chrys
Mud	Sinter Plant	SNT-05/B96-0465	Insulating Mud, 2" Water Line, Floor above Control Room, Facing SW		None Detected
Tile	Sinter Plant	SNT-09/B97-2410	Tile, Ceiling, Control Room		None Detected
Tar	Sinter Plant	SNT-10/B97-2411	Tar, Control Room Roof		None Detected
Tar	Sinter Plant	SNT-11/B97-2412	Tar Paper Strips, Control Room Roof		None Detected
4. Gaskets	Sinter Plant	SNT-12,13 B97-2482,2483	Gaskets, Flues	5 sf	20-35% Chrys
5. Gaskets	Sinter Plant	B97-2484	Gaskets, Flues	Multiply Gaskets	15-20% Chrys
6. Mud	Lead Stack Flue	SNT-06/L960213-16	Mud, Boiler, In Shed Located on Lead Stack Flue	Multiply Gaskets	None Detected
Mastic	Lead Stack Flue	LD-10/B96-0462	Mastic, Lead Stack Flue	3,956 sf	35-40% Chrys
Mastic	Lead Stack Flue	LD-10b/B97-0071	Mastic, Lead Stack Flue	same as above	25-30% Chrys
7. Tar	D&L Baghouse	SNT-07/L960213-15	Roofing Tar, Upper Level		None Detected
Brick/Motor	D&L Baghouse	SNT-08/L960213-17	Brick/Motor, Baghouse		None Detected
8. Gasket	Sinter Hot Cottrell	SNT-08a/B97-1766	Gasket, Screws, Floor Level	25 sf	10-15% Chrys
All Unidentified Gaskets Should Be Assumed To Contain Asbestos Unless Analysis Proves Otherwise.					

SINTER PLANT: Steel supports and structures. Concrete walls, floors, and supports. Metal bins and hoppers. Cinder brick. Steel pipes and flues, fiberglass insulation.

SINTER PLANT HOT COTTRELL: Steel supports and structures. Metal screws and hoppers. Fiberglass roofing and siding.

D&L BAGHOUSE: Brick structure. Steel supports, structures, and ladders. Some wood frames and planks.

LEAD STACK AND FLUE: Concrete structure. Steel ladder structures. Steel supports, structures, and ladders. Metal roofing and siding.



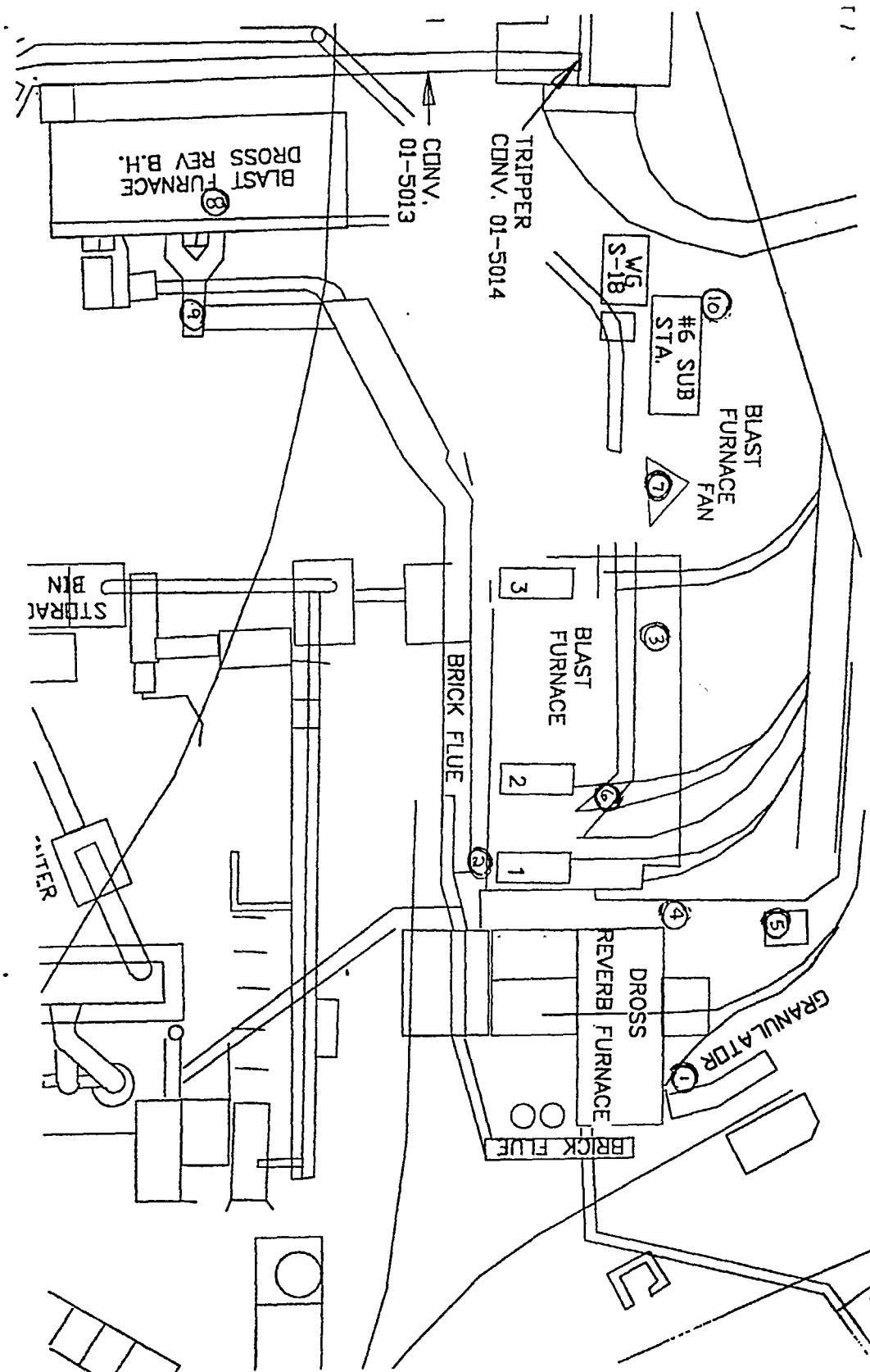
DROSS REVERB FURNACE/BLAST FURNACE BLAST FURNACE BAGHOUSE

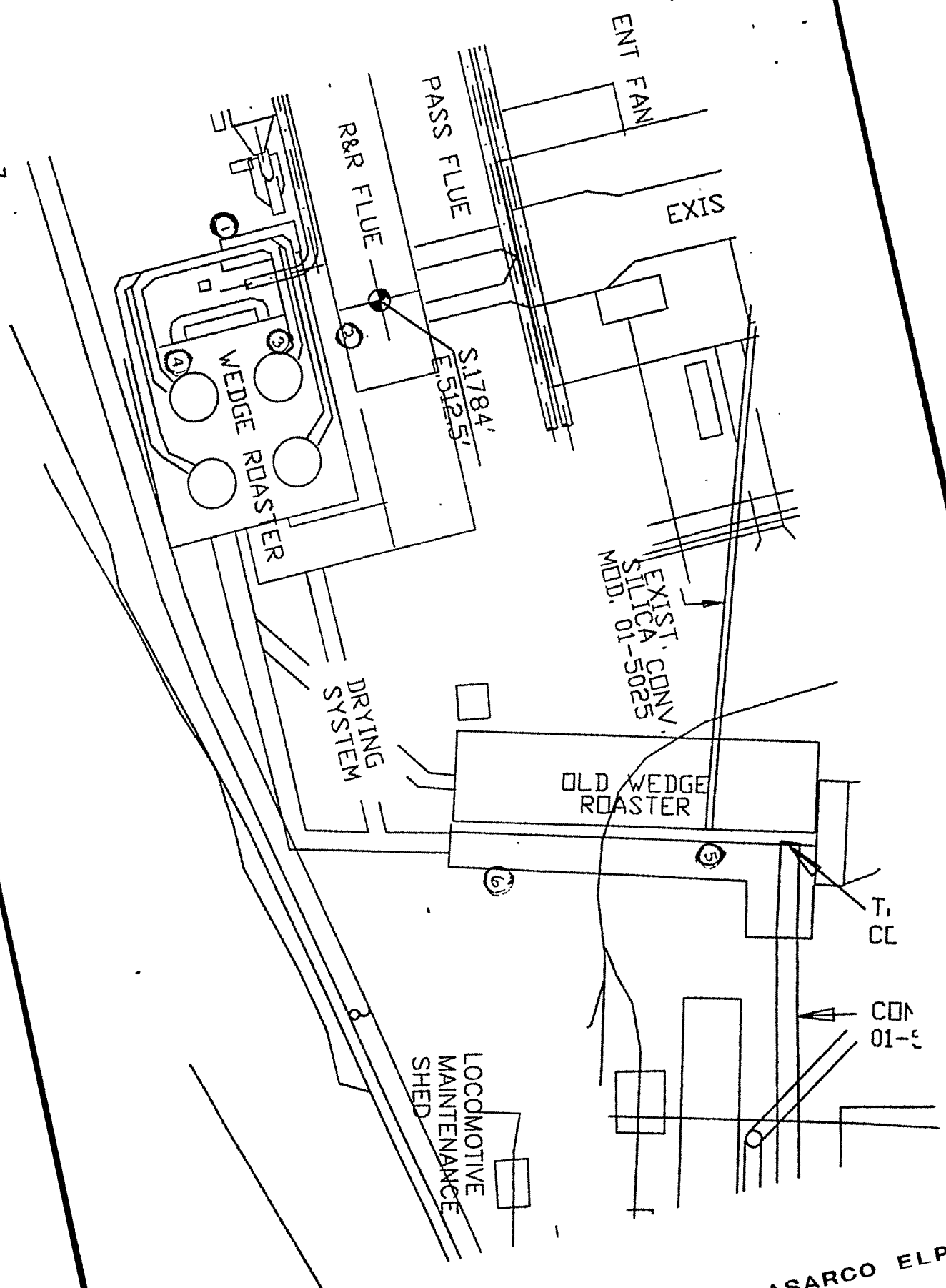
MAP LOCATION	PLANT LOCATION	PLANT/LAB NUMBER	DESCRIPTION	QUANTITY	ASBESTOS TYPE
1. Mud	Dross Reverb Furnace	LD-01/L960213-7	Mud Binder, North Lower Floor		None Detected
2. Insulation	Blast Furnace	LD-02/B96-0459	Pipe Insulation, Electrical Conduit above Exhaust for #1 Blast Furnace, Upper Level		None Detected
3. Brick/Motor	Blast Furnace	LD-03/L960213-8	Brick/Motor, Blast Furnace Flue		None Detected
4. Insulation	Dross Reverb	LD-04/L960213-9	Pipe Insulation, 2" Steam Pipe Located in Pipe Rack by Yard Office		None Detected
5. Tile	Dross Reverb	LD-19/B97-2409	Ceiling Tile, Yard Office		None Detected
6. Mastic	Blast Furnace	LD-05/L960213-10	Mastic, #2 Blast Furnace Hood		None Detected
7. Gasket	Blast Furnace	LD-06/L960213-11	Gasket, Blast Furnace Fan	Approx. 5 sf	80% Chrys
8. Mastic/Mud	Blast Furnace	LD-07/B96-0460.	Mastic Blast Furnace Baghouse Towers	9,000 sf	10-15% Chrys
Mud	Blast Furnace	LD-12 thru 17 B96-4696-4701	Mud Insulation, Blast Furnace Baghouse Towers		None Detected
Gaskets	Blast Furnace	LD-08/B96-0461	Gasket, Blast Furnace Baghouse Towers	Approx. 20 sf	30-35% Chrys
9. Gasket	Blast Furnace	LD-09/L960213-12	Gasket, Blast Furnace Fan	Approx. 5 sf	50% Chrys
10. Insulation	Blast Furnace	LD-20/B97-2408	Insulation Pipe Wrap, Ground by N-6 Sub-Station	Buried Pipe Unknown	10-15% Chrys
All Unidentified Gaskets Should Be Assumed To Contain Asbestos Unless Analysis Proves Otherwise.					

DROSS REVERB: Concrete walls supports and structures. Steel supports and structures. Sheet metal roofing and siding. Metal hoppers and bins. Brick furnace and flues. Steel railroad ties and supporting structures. Pipe rack consisting of steel pipe, some calcium silicate insulation present.

BLAST FURNACE: Concrete wall supports and structures. Steel supports and structures. Sheet metal roofing, some siding. Metal hoppers and bins. Brick flues. Steel piping and flues.

BLAST FURNACE BAGHOUSE: Concrete walls, floors, and ceiling. Steel structures and supports. Attached tin enclosures.





ASARCO ELP 0015187

WEDGE ROASTER/OLD WEDGE ROASTER R&R FLUE

MAP LOCATION	PLANT LOCATION	PLANT/LAB NUMBER	DESCRIPTION	QUANTITY	ASBESTOS TYPE
1. Gaskets	Wedge Roaster	RST-01/L952744-5	Gasket, #2 Contop HGF Baghouse Flues	Approx. 5 sf	50% Chrys
2. Rope	R&R Flue	RST-02/L952744-6	Rope, R&R Flue (Reverb and Roaster Flue)		None Detected
3. Mastic	Wedge Roaster	RST-03/B97-0551	Mastic, Roaster Exhaust Hood, 6th Floor		None Detected
4. Mastic	Wedge Roaster	RST-04/B972407	Mastic, Roaster Exhaust Hood, 6th Floor		None Detected
5. Tar	Old Wedge Roaster	RVB-21/L950213-20	Tar, Roof Seam Sealer	400 sf	18% Chrys
6. Rope	Old Wedge Roaster	RVB-21a/B97-2406	Rope, Seam Insulation Cement Walls	40 sf	50-55% Chrys
All Unidentified Gaskets Should Be Assumed To Contain Asbestos Unless Analysis Proves Otherwise.					

WEDGE ROASTER: Steel supports and structures. Sheet metal roofing and siding. Some fiberglass siding. Metal hoppers and bins. Conveyor belts and supporting structures. Metal flues with mineral wool insulation. Steel pipes.

REVERB AND ROASTER (R&R) FLUE: Steel supports and structures. Metal hoppers and screws. Brick flue. Metal siding with mineral wool insulation. Steel pipes. Some foam insulation.

OLD WEDGE ROASTER: Concrete walls, roof, and floors. Steel ladder structures. Steel pipes and flues.

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ASBESTOS

LOCATION	DESCRIPTION	MAP LOCATION
ZINC PLANT	Baghouse Hoppers	10
	Baghouse East Wall/Upper Wall	10
REVERB	Boilers	7
	Pipe: 3" Pipe North Side Approx. 50 feet 30" Pipe South Side Approx. 10 feet 4" Pipe South Side Approx. 100 feet 3" Pipe South Side Approx. 150 feet	7
	Flanges/Elbows North/South Side	7
	Dross Reverb Baghouse Towers	4
SINTER PLANT	Flue from Sinter Baghouse to Lead Stack	1 over to 3
	Control Room Floor Tile	2



Sun
City
Analytical
Inc.

January 16, 1998

Asarco Incorporated
P.O. Box 1111
El Paso, Texas 79999

ATTENTION: Peggy Munsell

RE: Transition flue

LAB NO#	SAMPLE NUMBER	DESCRIPTION	MATRIX	FIBROUS	ASBESTIFORM
B98-0218	RST-05	Tan Friable Mud	Gypsum	Mineral wool 5-10% Glass fibers 15-20%	None Detected
B98-0219	RST-06	Black Non-friable Mastic	Tar resins	Cellulose trace	Chrysotile 10-15% <i>removed Jan 1998</i>

Rosalva Gomez

Rosalva Gomez
MICROSCOPIST

Method: EPA-600/M4-82-020 "Interim Method for the Determination of Asbestos in Bulk Insulation Samples;"
EPA/600/R-93/116 "Method for the Determination of Asbestos in Bulk Building Materials," July 1993. Assigned percentages are based on visual volume procedures and chart aides, corresponding to an approximate standard error of + or - 5% for (1-10% range) and + or - 10% for (11-90% range). All microscopists are graduates of McCrone Research Institute's "Microscopical Identification of Asbestos", Chicago, Ill or equivalent. National Voluntary Laboratory Accreditation Program (NVLAP) Lab ID 101870-0.

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ASARCO ELP 0015190

WHITE - 1 AR
YELLOW - FILE
PINK - CIGAR