



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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Ref: 8EPR-SR

June 5, 2014

Libby Area Technical Assistance Group  
Mike Noble, President  
P.O. Box 53  
Libby, Montana 59923

Re: Libby Area Technical Assistance Group (LATAG) Comments, April 28, 2014  
Proposed Changes to Cleanup Involving Visible Vermiculite

Dear Mr. Noble:

Thank you for your comments regarding the Environmental Protection Agency's (EPA) approach to soil cleanups for the 2014 construction season. We also thank you for meeting with us in mid-April to discuss both the protectiveness of our removal actions, and the long-term management of any residual asbestos contamination. We share your concern that soil should be addressed if it is believed to be at a level of concern due to the presence of Libby amphibole asbestos (LA). Based on the exposure data we have collected, including over 3000 activity based sampling (ABS) results and over 1200 ambient air monitoring results, and our discussions with various community stakeholders, we have modified our approach to soil cleanups for this construction season.

Beginning this year, EPA will respond to properties where the only contamination is soil with LA concentrations between 0.2 percent and 1 percent. This is in contrast to previous years where EPA has put such properties on hold, focusing removal efforts on properties with LA concentrations in soil greater than 1 percent. This year, all soil with LA concentrations greater than 0.2 percent will be removed. EPA will also respond to properties where more than 25 percent of the frequently used areas at the property (yard, gardens, flowerbeds, etc.) have "trace" concentrations of LA in the yard ("trace" levels are less than 0.2 percent). Upon completion of the soil removal action, the majority of every property will have no detectable levels of LA in soil.

We have also changed our approach regarding vermiculite in soil. For a number of years, we have been removing visible vermiculite wherever it was identified on a property. Further study has shown that, while vermiculite can be an indicator of LA contamination, it doesn't necessarily mean that LA is present. Vermiculite in soil will be removed only when laboratory analysis confirms that it contains LA. The EPA's criterion for removal of interior vermiculite has not

changed. Readily accessible vermiculite will continue to be removed from interiors.

Your letter also mentions ongoing concerns the LATAG has with results presented by EPA on the background study. We have subsequently received your more detailed comments and will respond to those separately. EPA expects that toxicity values for Libby Amphibole asbestos will be identified this fall. Once that information is available, we will be able to complete the risk assessment and move forward with selection of a remedy in 2015.

We look forward to meeting with you again in mid-June to continue our discussions of the important issues facing us with the Libby Asbestos Superfund Site.

Sincerely,



Rebecca J. Thomas  
Libby Asbestos Team Lead

cc: Carolyn Rutland, MDEQ  
Nick Raines, ARP

