



**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, May 6, 2014
Wood harvesting and burning in the Libby area

Dear Mr. Mike Noble,

Thank you for providing comments and questions regarding wood harvesting and burning in the Libby area. We share TAG's interest in the issue and have collected environmental data as part of our remedial investigations to help us define the extent of contamination and measure exposures related to asbestos contamination in the duff and bark of trees. We understand that the communities of Libby and Troy depend on the wood as a significant heating source. EPA continues to work on a risk assessment to help us determine what actions may be needed to protect human health and the environment. Below are the responses to the questions you provided.

What is the extent of amphibole-contaminated trees throughout the Libby area?

EPA has conducted several investigations to measure the concentrations of asbestos in bark and duff around the Libby area. Based on data from the investigations completed, EPA has found that generally, the concentrations of LA fibers are highest closest to the mine and decrease the farther you move from the mine site. Fibers have been found in low concentrations as far as 10 miles north-east from the mine site. However, EPA has not completed sampling efforts to determine the full extent of contamination around the Superfund Site.

Are the protections in place to eliminate exposures within these forested areas?

Some amount of Libby Amphibole asbestos will remain in some of the forested areas. Therefore, it is not possible to eliminate exposures to asbestos. However, EPA has recommended that, until final remedy decisions are made for OU3, people refrain from recreating in the forest near the Vermiculite Mine, and refrain from harvesting trees from the forest near the Vermiculite Mine.

How prevalent is the burning of contaminated firewood throughout Libby?

EPA has no information regarding the locations where Libby and Troy residents harvest wood. Nor do we know if residents de-bark wood prior to removing it from the forested areas. Therefore, it is unknown if the wood being burned in Libby is contaminated.

Has any wood pile testing or home surveying been conducted within Libby? Have any wood stove ash samples been collected within residences to address this issue?

EPA conducted a study to evaluate potential exposures related to wood burning stoves. The burning events included wood harvested from 3 different locations (near, intermediate and far from the Vermiculite Mine). Bark, duff, ash and ABS samples were collected during this event. The results of that study can be found in the 2013 Wood-burning Stove Ash Removal Activity Based Sampling report.

What is EPA's long term strategy in dealing with this issue?

EPA continues to work on a risk assessment to determine the risk of exposure to asbestos from activities associated with wood-burning stoves. Long term strategies to address contamination in the forest will be evaluated in the Feasibility Study for the mine site, Operable Unit 3.

Are there plans to include the Asbestos Resource Program in dealing with this concern?

EPA appreciates the opportunity to work closely with the Asbestos Resource Program (ARP) on a number of issues involving asbestos management and communication for the Libby Superfund Site. Since the State of Montana is currently designated as the agency that will oversee much of the long-term Operations and Maintenance (O&M) of the eventual remedy for the Site, discussions of options for O&M will likely include EPA, the State of Montana, Lincoln County and the cities of Libby and Troy as well as ARP.

We look forward to meeting with you again in June. Please let us know if you have additional questions regarding wood harvesting and burning.



Thank You,
Liz Fagen, RPM

