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FINAL POLLUTION REPORT
LIBBY ASBESTOS SITE
OPERABLE UNIT 6

BURLINGTON NORTHERN SANTA FE RAILYARD

Date: May 14, 2012
Site Name: Libby Asbestos Site OU 6 (BNSF Rail Yard)
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POLREP No: Final POLREP for OU6
BNSF Rail Yard

Site No.: 08BC
Response Authority: CERCLA Removal Action
CERCLIS No: MT0009083840
NPL Listing: 10/23/02
Action Memorandum Amendment: 5/2/02
Start Date: 08/13/03
Completion Date: 4/21/10

I. BACKGROUND

The Libby Asbestos Superfund Site (Libby site) is located in and around the Town of Libby, Montana. Libby is the county seat of Lincoln County and is in the northwest corner of Montana, about 35 miles east of Idaho an 65 miles south of Canada (Exhibit 1-1). Operable Unit 6 (OU6) is one of eight OUs at the site and is comprised of the BNSF rail corridor and associated BNSF property. The subject of this pollution report is the BNSF rail yard where Highway 37 crosses the Kootenai River in Libby.

Vermiculite mining at Zonolite Mountain (the "mine") began in the 1920s. The processed ore was trucked down Rainy Creek Road to a screening plant which separated the milled ore into several sizes. Then, the screened ore was moved by conveyor across the Kootenai River and shipped to the Export Plant (adjacent to the rail yard which is the subject of this document) for further processing or across the country by rail.

The BNSF rail yard encompasses about 20 acres and is located in Section 7, Township 30N, Range 31W, of Lincoln County, Montana. The response action was conducted on BNSF property located north of the BNSF main line track. The eastern limit is the switch located between the BNSF main line and the rail yard at the eastern end of the yard. The western limit is the switch located between the BNSF passing siding and the rail yard at the western end of the yard. Response actions were also conducted on the former W.R. Grace facility (a 10 foot wide strip of property belonging to the City of Libby that runs east/west immediately north of the Libby rail yard). This 10 foot strip is located west of the Highway 37 overpass and north of the BNSF property line.

II. ACTIONS SINCE LAST POLREP

BNSF agreed to perform the cleanup at the Libby rail yard under an Administrative Order on Consent (AOC). BNSF's work plan and sampling plan were approved on October 25, 2002. Cleanup took place from August 13, 2003 through August 21, 2003. A work plan addendum, to address residual contamination resulting from the 2003 cleanup, was approved on September 26, 2005. Work was completed in November 2005.

The response action objectives included the following:

- Remove soil potentially containing Libby amphibole from areas of the rail yard that will continue to contain active tracks in the future.
- Cap soil potentially containing Libby amphibole in the areas of the rail yard that are not likely to contain active tracks in the future.
- Decontaminate and recycle or dispose of rail, ties, and other track materials that will be demolished to allow removal or capping of soil in areas the rail yard potentially containing Libby amphibole.
- Provide a final sub-grade elevation in the removal areas, with appropriate thickness of sub-ballast material beneath the final sub-grade, to permit BNSF to reconstruct track consistent with current and foreseeable future operational needs.

The mitigation activities were conducted in accordance with the Response Action Work Plan, as revised in 2005.

QUANTITIES OF MATERIALS

Item	Quantity	Units
Rail and other track materials	28,182	Linear feet
Railroad ties	8,000	Each
Soil potential containing Libby amphibole	12,859	Tons
Additional soil removed pursuant to the work plan revision	374	Cubic Yards
Clean imported backfill	17,792	Tons

The removal activities for the rail yard are complete. Two Construction Completion Reports were prepared by BNSF. They are entitled *Libby Railyard Response Action Revised Construction Completion Report,* dated March 2005 and *Libby Railyard Response Action Completion Report Addendum,* dated October 2006. These reports were accepted as final on April 21, 2010.

III. ENFORCEMENT

An Administrative Order on Consent (AOC) was entered into between the U.S. EPA and the Burlington Northern and Santa Fe Railway Company (BNSF), effective August 19, 2002. This AOC provides for the performance of a removal action by BNSF and the reimbursement of certain response costs incurred by the United States at or in connection with the BNSF property comprising the Libby rail yard in Libby, Montana.

IV. COST INFORMATION

Not applicable. This was a PRP-Lead Removal Action. The initial pollution report, dated September 29, 2003 estimated the cost of the cleanup to be $1,500,000.

V. DISPOSITION OF WASTES

All debris and soil contaminated with asbestos were disposed at the Lincoln County Landfill.

BNSF will manage residual contamination above a level allowing for unrestricted use and unlimited exposure with proprietary institutional controls.