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September 9, 2010

Mr. Dick Sloan
Montana Department of Environmental Quality
1100 North Last Chance Gulch
Helena, MT 59620-0901

Re: Libby Asbestos Superfund Site
Operable Unit 5 – Former Stimson Lumber Property
Remedial Investigation Report

Dear Dick:

Thank you for your comments on the Draft Remedial Investigation Report for Operable Unit 5 (OU5) of the Libby Asbestos Superfund Site. Enclosed, please find the Environmental Protection Agency's response to each of your comments. We anticipate making the document available to the public in mid-September and appreciate the comments that you provided. A draft Technical Memorandum for the development and screening of remedial alternatives will be provided to you soon as we continue to work on the OU5 Feasibility Study.

Sincerely,

Rebecca J. Thomas

Rebecca J. Thomas
Project Manager

Enclosure

EPA Responses
MDEQ Comments on Draft OU5 RI Report

General Comments:

1. The proposed text will be used elsewhere in the RI Report (the Report), as appropriate. However, visible vermiculite data presentation and discussion remain as the data are not irrelevant.

2. EPA believes that sufficient data exist to support the RI, FS and ROD. However, EPA will reevaluate data needs specific to OU5 once the Site-wide risk assessment is complete.

3. The Report will be modified as requested.

4. Cancer potency factors for asbestos that are currently used by EPA are not based on chrysotile. Rather, the values are based on a number of studies of workers exposed to chrysotile only, amphibole only, or a mixture of chrysotile and amphibole asbestos. The uncertainty associated with differing potency of various mineral forms of asbestos is discussed in Section 7.6.6.

5. The Report will be modified as requested.

6. The site-wide risk assessment will address risks from exposures at multiple OU's. The OU5 risk assessment assesses risks specific to OU5. Therefore, it is appropriate to complete the OU5 risk assessment at this time.

7. The NCP establishes "acceptable risk" in the $1x10^{-4}$ to $1x10^{-6}$ range. While MDEQs policy may differ from the NCP, the State's policy is not considered an ARAR and it has not been consistently applied across superfund sites in Montana.

8. ABS air measurements are used to estimate risks to humans. Human health risks are estimated to be within EPA's acceptable risk range for the current land use. As more information becomes available (e.g, regarding Site wide risks, sensitivity of new analytical methods, etc.) EPA will evaluate the new information to ensure that any remedy selected for OU5 remains protective.

9. The Report will be modified as requested.

10. EPA believes the current presentation is based on a reasonable compromise between presenting all data ever collected at OU5 regardless of relevance to the risk assessment and presenting only those data used in the risk assessment. EPA selected a position tending towards data presentation largely supporting the risk assessment. However, EPA

is aware that several soil data points shown on Figures 5-4 and 5-5 are in an area(s) where response actions have subsequently been conducted (e.g; west of the Pipe Shop). These figures will be modified to reflect current conditions.

11. The RI references SAPs for ABS air and soil sampling activities to direct the reader to the information requested in the comment. The report will be revised to include additional references for SAPs related to non-ABS sampling events.

12. The Report will be modified as requested.

Specific Comments:

1. The Report will be modified as requested

2. The Report will be modified as requested.

3. EPA believes the wording in the draft Report is accurate. EPA will evaluate risk at OU5 in the context of Site-wide risk when the Site-wide risk assessment is completed.

4. The Boundary Injection System Building was recently recognized to be within OU4 and all discussion of it will be removed from the Report.

5. EPA recognizes the uncertainty associated with the conclusion. However, we believe the conclusion to be reasonable. In addition, the cited sentence acknowledges some uncertainty by using the words "suggests" and "likely".

6. The Report will be modified as requested.

7. The Report will be modified on Page 1-1 to include the suggested language. However, EPA does not believe that these activities should be included in the discussion of contaminant Fate and Transport in the environment.

Comments 8-14 The Report will be modified as requested.

15. The cited sentence will be deleted.

Comments 16-19 The Report will be modified as requested.

20. Data that is suitable for use in the risk assessment is described in the remainder of Section 3.0 and subsequent sections of the Report.

21. EPA believes the existing text adequately makes the point.

22. The Report will be modified as requested

23. Because risks associated with the soil ingestion exposure pathway are expected to be small in comparison with the inhalation exposure pathway, risks from soil ingestion were not calculated. In order to use soil analytical data for estimating risk from inhalation of LA, it is necessary to develop a relationship between LA in soil and LA in air data during various human activities. This has proven to be difficult and has yet to be achieved. Therefore, risk estimates from exposure to LA at OU5 are based solely on ABS air data.

Comments 24-26 The Report will be modified as requested.

27. See response to General Comment No. 1

28. The Report will be modified as requested.

29. See response to General Comment No. 10

30. EPA believes the presentation in the draft Report has appropriately separated information used to evaluate the need for response actions under the removal program from information used to evaluate the need for remedial action.

31. Not at this time. One option being considered for the FS is an institutional control that will require additional sampling, risk estimation and mitigation of LA as necessary when building use changes (e.g from vacant to occupied as in the case of the Finger Joiner Process Plant). This will be explained in the FS.

32. ABS air data stands on its own as the measurement used to estimate human health risks. Also, see response to Specific Comment No. 23.

33. The Report will be modified as requested.

34. The Report will be modified as requested.

35. There is no evidence to indicate these building were relocated on or off of OU5. They are reasonably presumed to have been demolished.

36. There is no evidence that response actions were taken at the Diesel Fire Pump House and risk estimates based on ABS air data are below 1E-5. The sentence discussing the Tree Nursery will be deleted.

37. The reported dust measurements for these two buildings are correct. The identical dust measurement results are a consequence of both samples achieving the same analytical sensitivity (4,411.5 cm^{-2}) and observing the same number of LA fibers (i.e., 2 total LA fibers).

38. The Report states the facts. EPA does not believe the text requires modification.

39. See response to General Comment No. 1.

40. The text states that results have been consistent higher with measured LA up to 1%. The conclusion is not based on a single value of 1%. The text will be revised to reflect that relative higher LA measurements are restricted to a sub-area of the former Tree Nursery.

Comments 41-43 The Report will be modified as requested.

44. See Response to Specific Comment No. 7.

45. EPA does believe a discussion on this subject is relevant to the OU5 RI and is not aware of any research specific to asbestos transport associated with fires (other than that being performed for forest fires in OU3).

46. The Report will be modified as requested.

47. The Report will be modified as requested.

48. EPA believes that sufficient data exist to complete the RI and FS and to select a remedy for OU5. However, as more information becomes available (e.g, regarding Site wide risks, sensitivity of new analytical methods, etc.) EPA will evaluate the new information to ensure that any remedy selected for OU5 remains protective.

49. Section numbering will be corrected.

50. Section 7.3.3 is intended to present a general discussion of asbestos toxicity and how it depends on the type and size of asbestos. Section 7.6.6 relates this information to the Libby site.

51. See response to General Comment No. 7

52. The Report will be modified as requested.

53. As stated in the text, EPA has not yet developed methods for quantifying the uncertainty around the mean of a set of asbestos concentration values. Therefore, no "sensitivity analysis" is possible. The magnitude of the uncertainty depends in a complex way on the number of samples, the variability between the true (but unknown) concentration values in each sample, and the number of asbestos particles observed during the analysis of each sample

54. The first two rows in each panel of this table were erroneously included in the draft Report and will be omitted.

55. See response to Specific Comment No. 23.

56. The waste bark piles remain at OU5.

57. EPA believes the existing language is appropriate.

58. The last sentence of the cited paragraph discusses OU5.

Comments 59-60 The Report will be modified as requested.

61. The conclusion is correct.

62. The Report will be modified as requested.

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