



Superfund and You - *The Feasibility Study*

Recent *Superfund and You* columns discussed EPA's upcoming Remedial Investigation (RI) report which will present an analysis of all data collected at the Libby Asbestos Site, as well as estimates of risk from Libby Amphibole asbestos (LA). The RI, which will include a Baseline Risk Assessment, will answer questions about where contamination is and how much risk it presents. This will allow EPA to make a reasonable decision about what the final cleanup strategy will be for Libby.

The Feasibility Study (FS) is a companion document to the RI. It is a step-by-step, analytical process used by EPA to identify and evaluate cleanup *processes, technologies, and alternatives* at Superfund sites. It uses RI data to determine the need for (and scope of) clean up and presents an analysis of how risks identified in the RI can be *managed*.

At Libby, the FS process is aided by the fact that so many cleanups have already been done, providing important, first-hand data for evaluation of future cleanup alternatives. Remediation is not started at sites until after the RI/FS and Record of Decision (ROD) are issued. However, health risks at Libby warranted that cleanup begin immediately - while the RI/FS was being conducted. This work was done as part of a *time critical removal action*. EPA chose to reduce risks immediately by removing major source areas of LA and beginning residential and commercial cleanups as part of the response action.

Although the current cleanup approach appears to be working well, EPA did not simply assume that it was perfect and should be continued for all future cleanups. Instead, one of the first steps of the FS is to evaluate

the approach in detail to see if it, or a variation, should be considered for future cleanups. EPA wants to know: *Is the clean up working?* and *Is it protective enough?*

The next step in the FS is to develop a complete list of cleanup alternatives for evaluation. This is made easier in Libby because the technologies and process options for dealing with asbestos are fairly limited. There really are only a few things EPA can do to clean up Libby - most of which are related to physically removing or isolating the LA. Options range from "no action" to complete removal of all measurable LA.

The potential cleanup alternatives are then evaluated using nine specific FS criteria, including *protectiveness, compliance, or long-term effectiveness*. Alternatives that pass this evaluation are systematically compared against one another to determine relative strengths and weaknesses. This comparative analysis produces a *preferred alternative* for cleanup, which is then described in detail. The preferred alternative will be set forth by EPA in the Proposed Plan, which will be available for public comment. The end result is a preferred alternative for cleanup in which EPA and the community can be confident.

For More Information...

In the future, we will discuss the evaluation criteria EPA uses in the FS, the Proposed Plan for cleanup, and opportunities for public comment. EPA and our contractor, CDM, will be happy to provide information, and we also encourage citizens to contact the Libby CAG or TAG for assistance. For more information, contact the EPA Information Center at 501 Mineral Avenue (293-6194).

Published January 29, 2006