

**EPA Superfund  
Explanation of Significant Differences:**

**LIBBY GROUND WATER CONTAMINATION**

**EPA ID: MTD980502736**

**OU 02**

**LIBBY, MT**

**01/22/1997**

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**Libby Ground Water Superfund Site  
Lincoln County, Montana**

**United States Environmental Protection Agency  
January 1997**

**I. INTRODUCTION**

This Explanation of Significant Differences (ESD) is being issued by the U.S. Environmental Protection Agency (EPA) to modify certain remediation criteria established in the Record of Decision (ROD) issued by EPA on December 30, 1988, for the Libby Ground Water Superfund Site (hereby referred to as "Libby" or the "Site") and identifies the documents that serve as the basis for the determination.

EPA, in consultation with the Montana Department of Environmental Quality (MDEQ), and after consideration of documents prepared pursuant to the first Five-Year Review of the Libby Ground Water Site, has determined that modifications to the remediation levels established in the 1988 ROD are required to incorporate criteria developed since the ROD was issued. Modifications to the ground water remediation levels apply only to the Upper Aquifer. Remediation levels for the Lower Aquifer were established in an ESD Issued in 1993 (EPA 1993a).

The modifications to the remedy described in this ESD do not alter the selected remedy in any fundamental aspect regarding scope, cost, or performance. In accordance with Sections 117(c) and 121 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (Superfund), as amended, 42 U.S.C. Section 9601, et seq. ("CERCLA), and the regulations at 40 C.F.R. Section 300.435(c)(2)(i), the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), this ESD has been prepared for the following reasons:

- to provide the public with an explanation of the nature of the changes to the remedy;
- to summarize the circumstances that led to the changes to the remedy; and
- to affirm that the revised remedy complies with all statutory requirements.

MDEQ concurred on the ROD issued on December 30, 1988, and has participated in the review of information leading to this ESD, including the Five-Year Review Report, the Supplemental Protectiveness Evaluation and the Five-Year Review Site visit. MDEQ concurs on this ESD.

This document presents a summary of the changes to the selected remedy and a synopsis of information on the Site. The Administrative Record, which contains this ESD and the complete documentation, is available for public review at the locations indicated at the end of this report.

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**II. SITE HISTORY AND BACKGROUND**

The Libby Groundwater Superfund Site is located in the northwestern corner of Montana adjacent to the City of Libby, Lincoln County (see Figure 1). The Site currently consists of a lumber and plywood mill that was owned and operated by Champion International Corporation (hereafter Champion) from 1985 until November 1993 when Stimson Lumber Company purchased the mill. Champion has retained the responsibility for operation of the remediation efforts pursuant to a consent decree entered in the United States District Court for Montana.

From 1946 to 1969, the Site was operated as a wood treatment facility. Wood treating fluids, such as creosote [composed almost entirely of polynuclear aromatic hydrocarbons (PAHs)] and pentachlorophenol (PCP) were known to have been disposed and spilled at several different locations at the facility during this time. Groundwater contamination was first noticed within a domestic well (located within city limits) in 1979. EPA began site investigations in 1980, and

eventually placed the Site on the National Priorities List of Superfund Sites in 1983.

In 1985, studies were conducted to determine public exposure to contaminated groundwater in the City of Libby. As a result of these investigations, EPA recommended that an alternative water source be supplied to residents whose wells were contaminated by groundwater emanating from the facility. This recommendation was approved in a September 26, 1986 ROD and was implemented by Champion. Champion began additional remedial investigation studies in 1986 involving characterization of all contaminated media, including bench and pilot-scale testing of remedial technologies. In 1988, EPA and MDEQ signed a ROD that selected final cleanup methods for the affected media, including the soils/source area and the Upper Aquifer and an interim remedy for the Lower Aquifer. A Consent Decree requiring Champion to perform these cleanup activities was entered in the Federal District Court of Montana in October 1989. A summary of the 1988 selected remedy is provided in Section III below.

Remedial design activities began shortly after the Consent Decree was signed. These design activities included the preparation of remedial design documents that outline the strategy and design components of the remedy selected for both the contaminated soils and the contaminated Upper Aquifer. Following approval of design documents, remedial action implementation began. Operation of the components of the selected remedy has continued since 1990.

An ESD documenting the remedy selection for the Lower Aquifer was prepared and issued in 1993. Also included in the 1993 ESD was a determination to eliminate three chemical constituents from the list of soil parameters that the soil remedy must address.

A Five-Year Review of the Remedial Action was performed in January 1995 at the Libby Ground Water Site. The objectives of the Five-Year Review are: (1) to verify that the remedy is operating and functioning as designed and that institutional controls are in place and are protective and, (2) to evaluate whether the response action selected for the site remains protective of human health and the environment. The Five-Year Review conducted for the Libby site was performed in accordance with the Office of Solid Waste and Emergency Response (OSWER) Directives 9355.7-02 entitled "Structure and Components of Five-Year Reviews", (EPA 1991a) and 9355.7-02A, entitled "Supplemental Five-Year Review Guidance", (EPA 1994a).

The Five-Year Review for the Libby site was triggered by the initiation of a portion of the remedy by the responsible party (Champion International Corporation) in 1989. The Five-Year Review includes recommendations for the adoption of updated remediation levels for the site (excluding the Lower Aquifer) to assure that the site remedy is protective of human health and the environment.

### **III. SUMMARY OF THE 1988 RECORD OF DECISION**

The objective of the remedy selected in the 1988 ROD is to reduce human exposure to both the soil and groundwater contaminants of concern (see ROD, pages 51-55). The major components of this remedy consist of excavation and biological treatment of contaminated soils within an onsite LTU, and the in situ biological treatment of contaminated groundwater within the Upper Aquifer (including a pump and treat system for the heavily contaminated groundwater and oily product, with treatment occurring within a bioreactor system). An interim remedy was selected for the Lower Aquifer that consisted of feasibility testing of bioremediation remedial technologies, both alone and in conjunction with oil recovery and oil dispersion techniques (see ROD, page 55).

A complete list of the components of the current remedy selected for the Site can be found on pages 2 through 5 of the ROD. A brief summary of the existing remedy includes the following excerpts:

- Contaminated soils from the identified source areas will be excavated and placed within a waste pit, that already contains contaminated soils and debris from past disposal practices at the Site. These contaminated soils will undergo a two-step enhanced biodegradation process. The initial treatment phase will be conducted in the waste pit area, while the contaminants will be further degraded biologically after transfer to the LTU.

The LTU, which will be both lined and capped with low permeability materials, will serve as a final disposition location.

- The property owner shall be required to insert language within the current registered deed identifying the locations of the hazardous substances disposal and treatment areas, and restrict the future land use of these areas. This deed restriction is considered part of the selected remedy for the soils/source area.
- A combination of in situ bioremediation treatment processes will be utilized to degrade organic contaminants in the saturated zone of the waste pit area. A closed loop, bacteria rich groundwater injection and extraction system will be employed in the waste pit area to remove and degrade contaminants adsorbed on soil matrices.
- The oil recovery wells will also be used to collect highly contaminated groundwater, which will undergo treatment in a fixed film bioreactor prior to reinjection through a rock percolation bed.
- An in situ, enhanced bioremediation program will be initiated in the Upper Aquifer to reduce contaminant concentrations to required risk and ARAR-based levels. This innovative treatment technology will address both the dissolved constituents in groundwater as well as adsorbed contaminants on the aquifer matrices concurrently.
- An interim remedy was selected for the Lower Aquifer which required the PRP to conduct a pilot test to determine if enhanced bioremediation of the aquifer, both alone and in conjunction with oil recovery and oil dispersion techniques, is an effective method of remediation.
- The city ordinance prohibiting drilling new water supply wells within city limits (both within the Upper and Lower Aquifers) will be continued.
- Monitoring activities required to assess the performance of the components of the remedy will be performed throughout the life of the remedial activities at the Site. Long-term monitoring of the Lower and Upper Aquifer water quality is also required to determine further movement of the respective contaminant plumes, ensure protection of public health and assess potential degradation of Kootenai River.
- The Site conditions will be reviewed no less often than each five years after initiation of remedial action to ensure that human health and the environment are being protected by the remedy.
- An ESD selecting the final remedy for the Lower Aquifer was issued in September 1993. The final remedy for the Lower Aquifer consists of long term ground water monitoring and institutional controls limiting future water use.

#### IV. DESCRIPTION OF SIGNIFICANT DIFFERENCES TO THE REMEDY

The Significant differences between the remedy described in the 1988 ROD and in this ESD are:

1. The Maximum Contaminant Level (MCL) for Pentachlorophenol (PCP) in ground water, adopted as a federal standard in 1992, will replace the current PCP remediation level found in the ROD for the Upper Aquifer. The MCL is 1.0 microgram per liter (ug/l).
2. The MCL for Dioxin TCDD in ground water, also adopted since the 1988 ROD was issued, calculated using Toxicity Equivalence Factors (TEF), shall be added to the remediation parameters in the ROD for the Upper Aquifer. The MCL for Dioxin TCDD is  $3.0 \times 10^{-5}$  ug/l.
3. The MCL for each of the carcinogenic Polycyclic Aromatic Hydrocarbons (PAHs) in ground water listed in Table 1.0 will replace the Total Carcinogenic PAH remediation level found in the 1988 ROD for the Upper Aquifer.

4. The soil remediation level for Total Carcinogenic PAHs is revised to 59 milligrams per kilogram (mg/kg) calculated as Benzo-a-Pyrene (BaP) equivalents using the EPA 1993 relative potency factors (RFPs).
5. The soil remediation levels for Total Noncarcinogenic PAHs, based on a Hazard Index Value of 1.0, listed in Table 1.0 will be added to the list of remediation parameters.
6. The soil remediation levels for Dioxins/Furans will be revised as indicated in Table 2.0 to reflect the most recent TEF methodologies for risk-based calculation.

Only those changes described in paragraphs 1, 2, 3, 4, 5 and 6 above are being made to the selected remedy described in the 1988 ROD and 1993 ESD. All other aspects of the selected remedy documented in the 1988 ROD and 1993 ESD remain the same. A more detailed description of the revised components to the remedy follows.

#### **Risk-Based Remedial Goals Review**

Risk-based cleanup goals established in the ROD for both contaminated soils and groundwater were reviewed to determine the impact of changes in the toxicological assessment of PAHs and dioxins/furans using current EPA toxicological information and updated relative potency factor (RPF) and Toxicity Equivalency Factor (TEF) guidance (EPA 1989, EPA 1991b, EPA 1993c). This review effort was performed to assess the degree of protectiveness afforded by the current risk-based cleanup goals documented in the ROD for Libby.

The residential adult and construction worker exposure scenarios were used as the basis for 1988 cleanup levels presented in the ROD for groundwater and soil, respectively. The site-specific exposure parameters established in the human health evaluation for these scenarios were used in the calculation of chemical concentrations for specific target risk levels. In the absence of site-specific information, standard default exposure parameters were used in the calculations. Risk-based cleanup goals were also prepared for contaminants with MCLs for comparison purposes only.

A summary of the results of this risk-based cleanup goal review effort is presented in Table 1.0 and Table 2.0. Details regarding the methods and input parameters used to develop the 1994 risk-based cleanup goals presented in these tables are provided in the Supplemental Remedy Protectiveness Evaluation (Jacobs 1994b).

#### **Groundwater Cleanup Goals**

The comparison of the 1988 risk-based cleanup goal for total noncarcinogenic PAHs (0.4 Ig/L) established under the residential adult groundwater ingestion exposure scenario differs substantially from the 1994 values calculated for the individual noncarcinogenic PAHs, which ranged from 1,460 to 11,000 Ig/L (Table 1). This is most likely attributable to the difference in the toxicological assessment of noncarcinogenic PAHs in 1988 versus 1994. Carcinogenic promotion (or co-carcinogenicity) by the noncarcinogenic PAHs was assumed when the 1988 ROD value was promulgated. Currently, carcinogenic potency values are used to evaluate any carcinogenic response from PAHs. The 1994 risk-based values for noncarcinogenic PAHs provided in Table 1.0 address potential noncarcinogenic effects only. Carcinogenic promotion by noncarcinogenic PAHs is no longer considered in estimating potential carcinogenic effects from exposure to PAHs.

The range of the chemical-specific 1994 risk-based cleanup goals derived for carcinogenic PAHs is 0.1 to 0.0001 ug/L. The 1988 cleanup goal for total carcinogenic PAHs is 0.04 ug/L. The difference primarily is a result of the changes to RPFs published by EPA for the carcinogenic PAHs (Jacobs 1994b). The more recent RPFs were applied to the risk-based quantification of cleanup goals for carcinogenic PAHs in this review. However, a majority of the carcinogenic PAHs have been assigned an MCL since the time the ROD was signed. Furthermore, those PAHs listed in Table 1.0 that do not have an MCL (fluoranthene and pyrene) are no longer considered by EPA to be carcinogenic, as assumed at the time the 1988 risk-based cleanup goals were developed for the Libby site.

## Soil Cleanup Goals

The comparison of the 1988 and 1994 risk-based values for the soil contaminants specific to the Libby site is presented in Table 2.0. As described earlier, current RPF and TEF methodologies were used in developing the 1994 values for carcinogenic PAHs and dioxins/furans, respectively (EPA 1993c). Using the 1994 methodology, chemical-specific risk-based cleanup goals are presented for the individual contaminants of concern; cleanup goals under the 1988 approach were established for total carcinogenic PAHs and total dioxins/furans.

The 1994 risk-based cleanup goal calculated for PCP (36 mg/kg) closely matches the 1988 value of 37 mg/kg.

## V. SUMMARY OF STATE COMMENTS AND AVAILABILITY OF ADMINISTRATIVE RECORD

As stated above, MDEQ has reviewed the documents that serve as the basis for this determination and has provided comments to EPA on the documents. All of the MDEQ comments were incorporated into the final reports. MDEQ has been provided with the opportunity to review and comment on this ESD.

Documents referenced within this ESD are part of the Administrative Record for the Libby Site. The administrative record will also contain any written public comments that may be received regarding this ESD. The complete administrative record for the Site is available for public review at the following location:

U.S. EPA Montana Office  
Federal Building, Room 192  
301 South Park, Box 10096  
Helena, Montana 596-0096  
(406)441-1150  
Mon-Fri. 8:00 a.m. to 5:00 p.m.

Office of the County Sanitarian  
Lincoln County Annex  
418 Mineral Avenue  
Libby, Montana 59923  
(406) 293-7781  
Mon-Fri, 7:30 a.m. to 4:30 p.m.

## VI. AFFIRMATION OF STATUTORY REQUIREMENTS

Considering the new information that has been developed and the changes that have been made to the selected remedy, EPA, in consultation with MDEQ, believes that the remedy remains protective of human health and the environment, complies with Federal and State requirements that are both applicable or relevant and appropriate to this remedial action or involves appropriate waivers of these requirements, and is cost-effective. In addition, the revised remedy utilizes permanent solutions and alternative treatment technologies to the maximum extent practicable for the Site.

## VII. APPROVAL

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## REFERENCES

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- U.S. Environmental Protection Agency. 1994a. Supplemental Five-Year Review Guidance, Office of Solid Waste and Emergency Response, OSWER Directive No. 9355 5.7-02A.
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- U.S. Environmental Protection Agency. 1993c. Provisional Guidance for Quantitative Risk Assessment of Polycyclic Aromatic Hydrocarbons. Office of Research and Development, Washington, DC.
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- U.S. Environmental Protection Agency. 1989 (March). Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans, EPA No. 625/3-89/016.
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- Woodward Clyde Consultants. 1993b. Technical Evaluation Report for the Lower Aquifer, Final. Libby Groundwater Superfund Site. Libby, Montana. Prepared for Champion International Corporation.
- Woodward Clyde Consultants. 1993c. Focused Risk Assessment Report for the Lower Aquifer, Final. Libby Groundwater Superfund Site. Libby, Montana. Prepared for Champion International Corporation.
- Woodward Clyde Consultants. 1993d. LTU 1992 Annual Operational Report, Libby Groundwater Superfund Site. Libby, Montana. Prepared for Champion international Corporation.
- Woodward Clyde Consultants. 1992. LTU 1991 Annual Operational Report, Libby Groundwater Superfund Site. Libby, Montana. Prepared for Champion international Corporation.

Woodward Clyde Consultants. 1990. No Migration Petition, Land Treatment Units, Final. Libby Groundwater Superfund Site. Libby, Montana. Prepared for Champion International Corporation.

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**TABLE 1.0**  
**COMPARISON OF 1988 CLEAN-UP GOALS,**  
**MAXIMUM CONTAMINANT LEVELS (MCLs), and**  
**1994 RISK-BASED CLEAN-UP CONCENTRATIONS**  
**(GROUNDWATER)**

CONTAMINANTS OF CONCERN	1988 VALUES		1994 VALUES	
	CLEAN-UP GOAL (I <sub>g</sub> /L)	BASIS (a)	CLEAN-UP CONCENTRATION (I <sub>g</sub> /L)	BASIS
Noncarcinogenic PAH Compounds				
Naphthalene	(a)	Evidence of	1460	Risk-Based
Acenathylene		promoting	N/A	Value
Acenapthene		carcinogenic activity	2190	HI=1.0
Fluoren		of other cancer-	1460	
Phenanthrene		causing compounds	N/A	
Anthracene			1100	
Fluoranthene			1460	
Pyrene			1100	
Benzo(g,h,i)perylene			NA	
Carcinogenic PAH Compounds				
Fluoranthene (c)	(d)	Risk-Bond	N/A	N/A
Pyrene(c)		Value	N/A	N/A
Chrysene		10 5	0.2	MCL
Benzo(a)anthracene		and	0.1	MCL
Benzo(b)fluoranthene		Achievable	0.2	MCL
Benzo(k)fluoranthene		Detection	0.2	MCL
Benzo(a) pyrene		Limits	0.2	MCL
Indeno(1,2,3-c,d)pyrene			0.4	MCL
Dibenzo(ah)anthracene			0.3	MCL
Penatachlorophenol	1050	Lifetime Health Advisory	1.0	MCL
Benzene	5.00	MCL	5.00	MCL
Arsenic	50.00	MCL	50.00	MCL

(a)= Cumulative concentration for all noncarcinogenic PAHs shall not exceed 0.4 ug/L.

(C)= Assessed as a potential carcinogen in 1988; not classifiable as to human carcinogenicity and assessed as a noncarcinogen in 1994.

(d)= Cumulative concentration for all carcinogenic PAHs shall not exceed 0.04 ug/L.

(e)= Taken from 1988 Record of Decision

HI= Noncarcinogenic Hazard Index

MCL= Maximum Contaminate Level

NA = not applicable

PAH= Polycyclic aromatic hydrocarbon

I<sub>g</sub>/L= micrograms per liter

**TABLE 2.0**  
**COMPARISON OF 1988 CLEAN-UP GOALS AND**  
**1994 RISK-BASED CONCENTRATIONS (SOILS)**

CONTAMINANTS OF CONCERN	1988 VALUES		1994 VALUES	
	CLEAN-UP GOAL (mg/kg)	BASIS (a)	CLEAN-UP CONCENTRATION (mg/kg)	BASIS
<b>Furans:</b>				
tetra(2,3,7,8,)			0.0289	Risk-Based Value 105
tetra(non-2,3,7,8,)			NA	
pentra(1,2,3,7,8,)	(a)		0.0578	
pentra(2,3,4,7,8,)		Risk-Based	0.00578	
pentra(other)		Value (b)	NA	
hexa(2,3,7,8,)		105	0.0289	
hexa(non-2,3,7,8,)			NA	
hepta(2,3,7,,8)			0.289	
hepta(non-2,3,7,8,)			NA	
octa			2.89	
<b>Dioxins:</b>				
tetra(2,3,7,8,)			0.00289	Risk-Based Value 105
tetra(non-2,3,7,8)			NA	
pentra(2,3,7,8,)	(a)	Risk-Based	0.00578	
pentra(non-2,3,7,8)		Value(b)	NA	
hexa(2,3,7,8,)		105	0.0289	
hexa(non-2,3,7,8,)			NA	
hepta(2,3,7,8,)			0.289	
hepta(non-2,3,7,8,)			NA	
octa			2.89	
Pentachlorophenol	37	BDAT	36	
<b>Carcinogenic</b>				
Benzo(a)pyrene			59	Risk-Based Value 10 -5
Benzo(a)anthracene		Risk-Based	594	
Benzo(b)fluoranthene	(c)	Value	594	
Benzo(k)fluoranthene		105	5,940	
Chrysene			59,400	
Dibenzo(a,h)anthracene			59	
Indeno(1,2,3,-cd)pyrene			594	
<b>Noncarcinogenic PAHs:</b>				
Acenaphthene	NA		166	Risk-Based Value HI=1.0
Acenaphthylene	NA	(d)	NA	
Anthracene	NA		33	
Fluoranthene	NA		250	
Fluorene	NA		250	

- (a)= 2,3,7,8 - TCDD equivalency concentrations of chlorinated dibenzo-p-dioxins and dibenzofurans combined <0.001mg/kg.
  - (b)= Proportional value based on proportionate risk of dioxins/furans and PAHs (90% for PAHs and 10% for dioxins in each scenario).
  - (c)= Total carcinogenic PAH concentration < 88 mg/kg.
  - (d)= Noncarcinogenic health risk associated with soils determined to be not of concern according to 1988 baseline risk assessment.
  - (e)= Taken from 1988 Record of Decision.
- BDAT= Be Demonstrated Available Technology  
HI = Noncarcinogenic Hazard Index  
NA = not applicable  
PAH= polycyclic aromatic hydrocarbon  
mg/kg= milligram per kilogram

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REGION VIII, MONTANA OFFICE  
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HELENA, MONTANA 59626-0096

<IMG SRC 97146E>

Attached is a copy of the final Explanation of Significant Differences, January 1997 (ESD) for the Libby Ground Water Site. The final ESD was signed on January 21, 1997.

EPA is currently preparing an announcement of the issuance of the 1997 ESD that will be sent to the Libby Site mailing list this month. A draft of the fact sheet will be sent to you next week.

Would you please provide a copy of the final ESD and supporting documents to the County Sanitarian's Office as soon as is convenient? The fact sheet and a public announcement to be published in the Western News will indicate that the ESD and supporting documents will be available for review both at the EPA office in Helena and at the sanitarian's office in Libby.

Thank you for your assistance. Please let me know if you have any question concerning this request.

<IMG SRC 97146F>

CONCURRENCE COPY

Ref: 8MO

March 21,1997

Ralph Heinert  
Manager Environmental Projects  
Champion International Corporation  
P.O. Box 1590  
Libby, MT 59923

Dear Mr. Heinert:

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Thank you for your assistance. Please let me know if you have any question concerning this request.

Sincerely,

James C. Harris, P.E.  
Remedial Project Manger

Attachment:

cc: J. Carraway, Champion, Stamford  
N. Marsh, MDEQ

<IMG SRC 97146G>