

# Community Engagement Plan

*"In preparing for battle, I have always found that plans are  
useless, but planning is essential."*

President Dwight Eisenhower

**Libby Asbestos Superfund Site**  
Libby, Montana





RESPONSE ACTION CONTRACT  
FOR REMEDIAL, ENFORCEMENT OVERSIGHT, AND NON-TIME  
CRITICAL REMOVAL ACTIVITIES AT SITES OF RELEASE OR  
THREATENED RELEASE OF HAZARDOUS SUBSTANCES  
IN EPA REGION VIII

U. S. EPA CONTRACT NO. EP-W-05-049

COMMUNITY ENGAGEMENT PLAN

LIBBY ASBESTOS SUPERFUND SITE

LINCOLN COUNTY, MONTANA

Work Assignment No.: 55919-3380-229-CRZ-GENCI

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# Abbreviations and Acronyms

ATSDR.....	Agency for Toxic Substances and Disease Registry
CAG .....	Community Advisory Group
CARD .....	Center for Asbestos Related Disease
CDM .....	CDM Federal Programs Corporation
CEP .....	Community Engagement Plan
CERCLA.....	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS .....	Comprehensive Env Response, Compensation, and Liability Info System
CIC .....	Community Involvement Coordinator
CORA .....	CARD Outreach Recovery Assistance Program
DEQ .....	Montana Department of Environmental Quality
DPHHS.....	Montana Department of Health and Human Services
EPA .....	U.S. Environmental Protection Agency
ERS.....	Environmental Resource Specialist
°F .....	degrees Fahrenheit
Grace.....	W.R. Grace
LA .....	Libby Amphibole
NPL.....	National Priorities List
O&M.....	operations and maintenance
OU.....	operable unit
RI/FS .....	remedial investigation/feasibility study
ROD .....	record of decision
RPM .....	Remedial Project Manager
TAG .....	Technical Assistance Group
USFS .....	U.S. Department of Agriculture, Forest Service
USFWS .....	U.S. Fish and Wildlife Service



# Section 1 What's Happening Now?

## 1.1 A New Approach to the CEP

This document represents the Community Engagement Plan (CEP) for the U.S. Environmental Protection Agency's (EPA's) Libby Asbestos Superfund Site in Libby, Montana. As such, it is EPA's guide for conducting outreach activities at the site. Section 1 provides a "real time" snapshot of the current community involvement conditions at the site. It is meant to be organic, in that it will be ever-evolving and its contents will depend solely on what is going on with the Superfund project at the moment (or as close to the moment as possible).

This section is an entirely new forum for the EPA Community Involvement Coordinator (CIC) to describe the situation on the ground in Lincoln County. The form and content of Section 1 are entirely up to the current CIC and are driven by what's happening now rather than prescribed government guidelines. Readers of this section should be able to gauge the community's temperament with respect to the Superfund site. The site's community involvement staff will maintain and update this section as events unfold relating to the project.

## 1.2 Updateable Tabs

As described above, Section 1 is intended to be easily updateable and current. To facilitate this, the section includes a number of tabs. At the time this CEP was produced, the five tabs were:

- Hot topics
- Recent media coverage
- Status of community groups
- Meeting minutes
- Construction facts

Each of these topics is described under a separate tab within this section. The contents of these tabbed areas are meant to be updated regularly in this three-ring binder. For instance, copies of site-related press coverage or meeting minutes will be added as they

### *About the CEP Format*

*This CEP follows a new formatting approach designed to make it more of a living document that is useful to citizens. This is most evident in the format of Section 1.*

*In this CEP, Section 1 is a forum for the CIC to describe the situation as it is on the ground in as 'real time' account as possible. The format and content can change with each CIC and will be the only section that is updated regularly. For example, the section could describe the current status of the CAG, the fallout from the most recent town meeting, agency or citizen reaction to the latest newspaper article, etc. It should be updated at least as often as the web site.*

*The CEP is a guide for the CIC, but Section 1 will be the section of the most interest and help to a resident or to someone considering moving to town. It should be relatively subjective, casual, and even (on occasion) entertaining. It need not be long or comprehensive, just alive and hopefully topically informative.*

*It would be more of an introduction to the current temperament of the community rather than to the CEP itself.*

Ted Linnert, EPA  
Libby CIC 2005-2010

are issued. Older versions may be removed if space becomes an issue. New tabs may also be added by the current CIC, as needed.

### **1.2.1 Hot topics**

This tabbed area contains brief descriptions or examples of the hot issues of the day that relate to the site. Information included in this tabbed area covers the issues that EPA's CIC is dealing with right now.

### **1.2.2 Recent media coverage**

This tabbed area presents examples of what the press is saying about the site. There are three local newspapers (*Montanian*, *Kootenai Valley Record*, and *Western News*). Coverage on Libby sometimes also is found in the *Missoulian*.

### **1.2.3 Status of community groups**

This CEP describes many community groups in Lincoln County. However, three groups concern themselves exclusively with Superfund and asbestos cleanup. They are the Community Advisory Group (CAG), Technical Assistance Group (TAG), and Operations and Maintenance (O&M) Group. Their meetings are open to the public, and they are described in the "Status of community groups" tabbed area in this section.

### **1.2.4 Meeting minutes**

This tabbed area contains the latest minutes from some of the community groups listed in Section 1.3 that discuss Superfund issues.

### **1.2.5 Construction facts**

This tabbed area contains the latest construction data on EPA's Superfund project.

## **1.3 CEP Layout**

The entire CEP contains five sections, as described below:

- **Section 1 – What's Happening Now.** Provides a snapshot of the current state on community involvement at the site. Includes the five tabbed areas described above that are meant to be updated regularly.
- **Section 2- Site Background.** Identifies information about the site setting, layout, past operations, and the regulatory history.
- **Section 3 - Community Engagement Objectives.** Describes EPA's objectives for community involvement and communication at the site.
- **Section 4 - Community Engagement Activities.** Describes activities tailored to promote effective community involvement that have been conducted to date and that are planned for the future.

- **Section 5 Community Profile, Interviews, and Concerns.** Discusses the demographics of the area in the vicinity of the site. It also describes the community interview process used by EPA to prepare this CEP and summarizes the concerns and suggestions of the community.

The CEP also includes multiple appendices with contacts, maps, examples of past outreach materials and details on EPA's community involvement approach and environmental justice (see table of contents). The Montana Department of Environmental Quality's (DEQ's) Community Involvement Plan (CIP) for nearby Troy, Montana is provided as Appendix A. Appendix B provides the "fine print" – information on EPA's community engagement mandate, public involvement policy, and groups and programs involved at the site.



## Section 2 Site Background

The site is located in the northwest corner of Montana, about 35 miles east of Idaho and 65 miles south of Canada, in the small town of Libby. The town lies in a picturesque valley carved by the Kootenai River and framed by the Cabinet Mountains to the south. The community's assets include clean water, beautiful scenery, and recreational opportunities such as fishing, hiking, hunting, boating and skiing.



Site location map

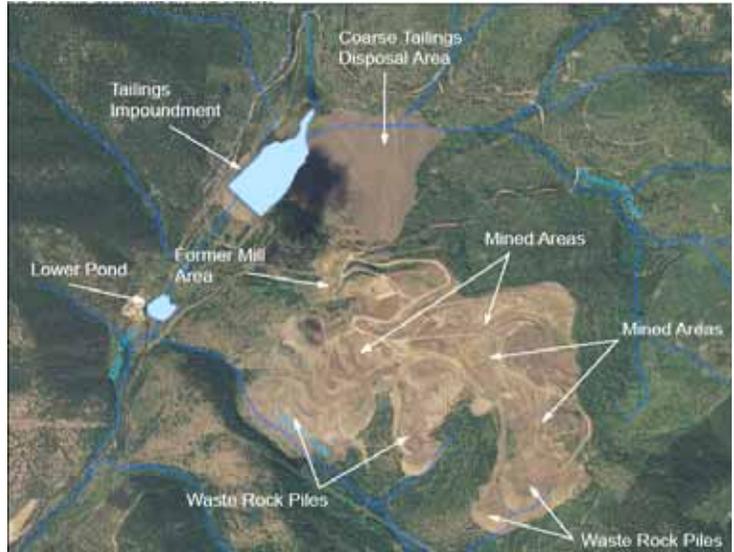
### 2.1 Site History

Numerous hard rock mines have operated in the Libby area since the 1880s, but the dominant impact to human health and the environment in Libby has been from vermiculite mining and processing. Prospectors first located vermiculite deposits in the early 1900s on Rainy Creek northeast of Libby. Edward Alley, a local rancher, was also a prospector and explored the old gold mining tunnels and digs in the area. Reportedly, while exploring tunnels in the area, he stuck his miner's candle into the wall to chip away some ore samples. When he retrieved his candle, he noticed that the vermiculite around the candle had expanded, or "popped," and turned golden in color.



In 1919, Alley bought the Rainy Creek claims and started the vermiculite mining operation called the "Zonolite Company (see photo)." While others thought the material was useless, he experimented with it and discovered it had good insulating qualities. Over time, vermiculite became a product used in insulation, feed additives, fertilizer/soil amendments, construction materials, absorbents, and packing materials. Many people used vermiculite products for insulation in their houses in and around the Libby Site and soil additives in their gardens. In 1963, the W. R. Grace Company (Grace) bought the mine and associated processing facilities and operated them until 1990.

Operations at the mine included blast and drag-line mining and milling of the ore. Dry milling was done through 1985, and wet milling was done from 1985 until closure in 1990. After milling, concentrated ore was transported down Rainy Creek Road by truck to a screening facility (known today as the former Screening Plant – Operable Unit 2 [OU2]) adjacent to Montana Highway 37, at the confluence of Rainy Creek and the Kootenai River. Here the ore was size-sorted and transported by rail or truck to processing facilities in Libby and nationwide. At the processing plants, the ore was expanded or “exfoliated” by rapid heating, then exported to market via truck or rail. Historic maps show the location of the “Zonolite Company” processing operation at the edge of the lumber mill, near present day Libby City Hall. This older processing plant was taken off line and demolished sometime in the early 1950s. The other processing plant (known today as the former Export Plant – Operable Unit 1 [OU1]), was located near downtown Libby near the Kootenai River and Highway 37. Expansion operations at the site ceased sometime prior to 1981, although existing site buildings were still used to bag and export milled ore until 1990. After operations at the Export Plant ceased, various commercial and industrial business operated from the former plant location until Grace and EPA began removal activities in 2000.



Aerial view of the vermiculite mine near Libby

Over the course of Grace’s operation in Libby, invoices indicate shipment of nearly 10 billion pounds of vermiculite from Libby to processing centers and other locations. Most of this was shipped and used within the United States. Nearly all of this material ended up in a variety of commercial products that were marketed and sold to millions of consumers.

## 2.2 EPA Involvement

In response to local concern and news articles about asbestos-contaminated vermiculite, the EPA sent an Emergency Response Team to Libby, Montana in late November 1999. The Team immediately began collecting information. EPA's first priority was to assess the current risk to public health from asbestos-contaminated vermiculite in Libby. Next, the Agency began taking necessary actions to reduce this risk.

In December 1999, EPA began collecting samples (nearly 700) from air, soil, dust and insulation at homes and businesses (see below). Indoor air sample results were released first to property owners and then to the media and general public. EPA also moved immediately to locate areas in and near Libby that were likely to have high levels of contamination such as the two former vermiculite processing facilities.

EPA also looked at general asbestos exposures in the community and at health effects seen in people who had little or no association with the vermiculite mine in Libby. EPA worked closely with local, state and federal agencies to understand how people might come into contact with asbestos-contaminated vermiculite and what can be done to prevent future exposures - in Libby and elsewhere. Libby was added to EPA's National Priorities List (NPL) (the "Superfund" list) in October 2002.

EPA established the Contaminant Screening program to inspect all properties in Libby. Approximately 3,500 properties were inspected in 2002 and 2003. Over 12,000 soil samples were collected and analyzed and the results were sent to property owners.



**2002**

- Most cleanup of WR Grace facilities, schools, and public areas completed
- EPA announces decision to clean residential properties including vermiculite insulation
- Libby added to Superfund list
- 3000+ properties inspected and sampled during the CSS
- 26 residential cleanups completed

**2003**

- 1200+ properties inspected or sampled
- EPA publishes interim cleanup standards and protocols
- 157 residential or commercial cleanups completed
- City boat ramp cleanup completed

**2004**

- 170 residential or commercial cleanups completed
- EPA announces it will include Troy in the cleanup
- Cleanup of BNSF rail yard completed
- Cleanup of Flyway property completed
- New cleanup contract awarded

**2005**

- 225 residential or commercial cleanups completed
- Special sampling to verify protectiveness of cleanup
- Remedial Investigation and Feasibility Study underway
- Begin initial coordination for 2006 Troy investigations

**2006**

- 216 residential or commercial cleanups completed
- Remedial Investigation and Feasibility Study underway
- Outdoor Ambient Air sampling program initiated

**2007**

- 160 large and complicated properties completed
- Outdoor Ambient Air sampling program in progress
- Activity Based Sampling program initiated
- Toxicity studies identified for Baseline Risk Assessment
- ERS program initiated
- Sampling in Troy initiated

**2008**

- 143 properties completed in Libby, 6 in Troy
- Activity Based Sampling completed
- Toxicity Studies continue for Baseline Risk Assessment
- Sampling in Troy progresses
- Investigations at all OUs continued
- Work begins on creeks with contaminated rip-rap

**2009**

- 100 to 150 properties targeted in Libby
- Golf course cleanup scheduled to begin
- Remaining creeks to be completed
- Troy sampling wraps up
- Toxicology studies and investigations move forward

**2010**

- RODs for OUs 1&2 signed and implemented
- Removals in Troy begin
- Investigations at the Mine in full swing
- Historic Hotel Libby cleaned up

Summary of site activities 2000 to 2009

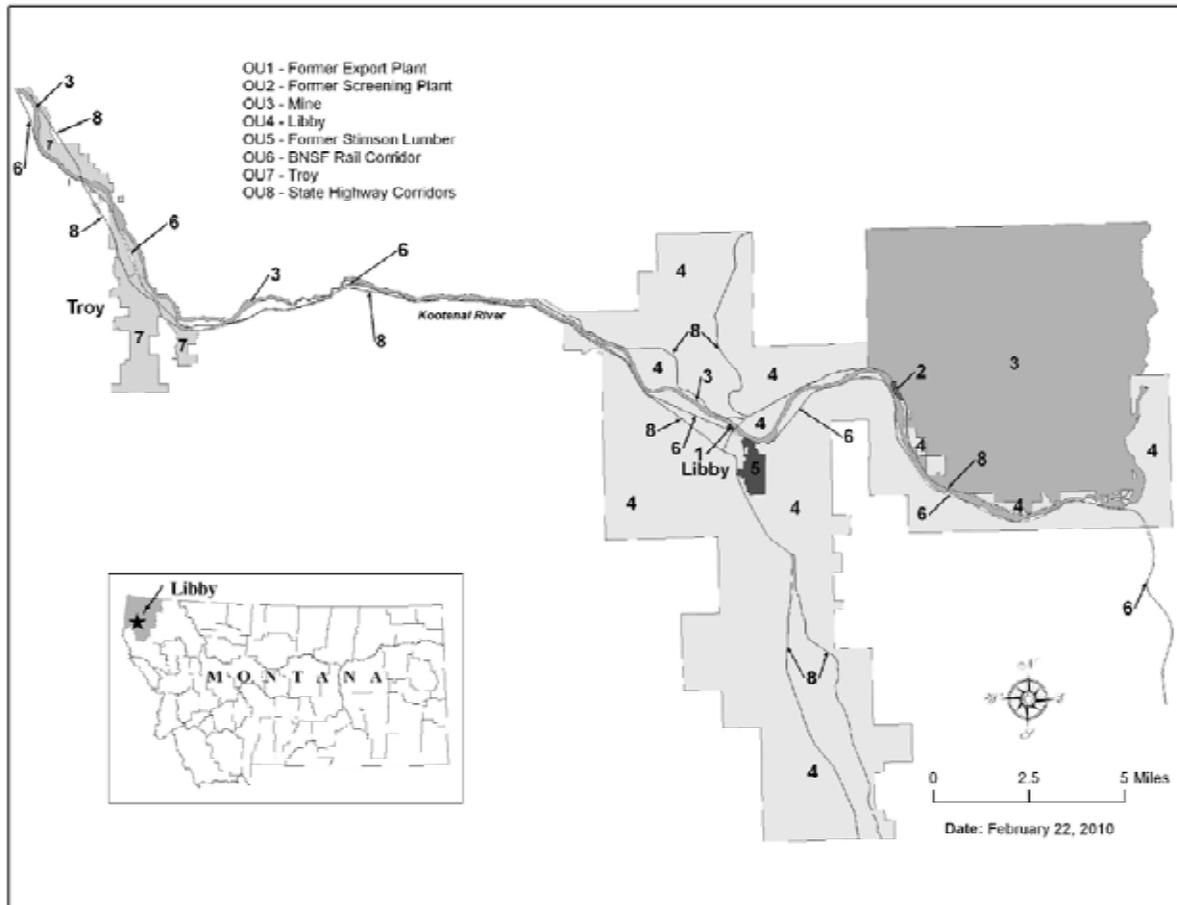
As of 2010, the former vermiculite processing plants and other highly contaminated public areas have been cleaned up. Cleanups have also been completed at over 1200 residential and commercial properties. EPA expects to complete cleanups at least 100 larger properties during the 2010 construction season, including the historic Hotel Libby. Toxicological and epidemiological studies on Libby Amphibole asbestos are underway to support the baseline risk assessment for the site. Preliminary site assessment work has also begun at the vermiculite mine itself.

Based on current information, EPA estimates that 1200 to 1400 residential and business properties will need some type of cleanup. The total number depends upon the final cleanup standards to be set by EPA when the scientific studies supporting the risk assessment are completed. EPA works closely with local, state and federal agencies, including: City of Libby, Lincoln County Commissioners and Department of Environmental Health, the state of Montana, and the ATSDR. Appendix C provides a variety of maps useful for illustrating the site layout, boundaries, and the extent of various investigations and cleanup activities. New maps will be added to this appendix as needed.

## **2.3 Operable Unit Site Descriptions**

To facilitate a multi-phase approach to remediation of the site, eight separate operable units (OUs) have been established. These OUs are shown on the following map and include:

- **OU1.** The former Export Plant is situated on the south side of the Kootenai River, just north of the downtown area of the City of Libby, Montana. OU1 includes the embankments of Highway 27, the former Export Plant, and Riverside Park. The property is bounded by the Kootenai River on the north, Montana Highway 37 (forthwith referred to as Highway 37) on the east, the BNSF railroad thoroughfare on the south, and State of Montana property on the west.
- **OU2.** OU2 includes areas impacted by contamination released from the former Screening Plant. These areas include the former Screening Plant (Subarea 1), the Flyway property (Subarea 2), a privately-owned property (Subarea 3), and the Rainy Creek Road Frontage and Highway 37 right-of-way adjacent to Rainy Creek Road (Subarea 4).
- **OU3.** The mine OU includes the former vermiculite mine and the geographic area (including ponds) surrounding the former vermiculite mine that has been impacted by releases from the mine, including Rainy Creek and the Kootenai River. Rainy Creek Road is also included in OU3. The geographic area of OU3 is based primarily upon the extent of contamination associated with releases from the former vermiculite mine.



- **OU4.** OU4 is defined as residential, commercial, industrial (not associated with former Grace operations), and public properties, including schools and parks in and around the City of Libby, or those that have received material from the mine not associated with Grace operations. OU4 includes only those properties not included in other OUs.
- **OU5.** OU5 includes all properties that were part of the former Stimson Lumber Mill and that are now owned and managed by the Kootenai Business Park Industrial Authority.
- **OU6.** The rail yard owned and operated by Burlington Northern Santa Fe (BNSF) is defined geographically by the BNSF property boundaries and extent of contamination associated with BNSF rail operation. Railroad transportation corridors are also included in this OU and have not been geographically defined.
- **OU7.** The Troy OU includes all residential, commercial, and public properties in and around the Town of Troy, approximately 20 miles west of downtown Libby.
- **OU8.** OU8 is comprised of the US and Montana State Highways and secondary highways that lie within the boundaries of OU4 and OU7.

## **2.4 Site Setting**

### **2.4.1 Climate**

Libby has a relatively moist climate, with annual precipitation in the valley averaging slightly over 20 inches (this includes approximately 60 inches of snowfall). Surrounding higher elevations receive significantly more precipitation. During the winter months, moist Pacific air masses generally dominate, serving to moderate temperatures and bring abundant humidity, rain, and snow. Colder, continental air masses occasionally drop temperatures significantly, but generally only for shorter periods. The average temperatures in December and January are 25 to 30 degrees Fahrenheit (°F).

During summer, the climate is warmer and dryer, with only occasional rain showers and significantly lower humidity and soil moistures. High temperatures of greater than 90°F are common. The average temperature in July is approximately 65 to 70°F. Spring and fall are transition periods.

Due to its valley location along the Kootenai River and downstream of the Libby dam, fog is common in the Libby valley. This effect is most pronounced during winter and in the mornings. Inversions, which trap stagnant air in the valley, are also common. Winds in the Libby valley are generally light, averaging approximately 6 to 7 miles per hour. Prevailing winds are from the WNW, but daily wind direction is significantly affected by temperature differences brought about by the large amount of vertical relief surrounding the area.

### **2.4.2 Surface Water Hydrology**

The Kootenai River, which flows adjacent to the site, has its origins in British Columbia's Kootenay National Park in Canada. From there it flows 485 miles into northwest Montana and through the towns of Libby and Troy. From there it flows into northern Idaho, then back into Canada and Kootenay Lake. Ultimately it joins with the Columbia River. Sixteen miles north of Libby, the river is held back by Libby Dam, creating a 90-mile long reservoir called Lake Koocanusa which reaches into Canada. Seasonal fluctuations in precipitation cause varying levels of runoff and creek flow. Typically, runoff is most significant in spring when snow at higher elevations begins to melt. Summer precipitation does occur; however, typical summer weather is hot and dry and creek flow is moderated by high elevation lakes.

### **2.4.3 Geology**

The mountains surrounding Libby are generally composed of folded, faulted, and metamorphosed blocks of Precambrian sedimentary rocks and minor basaltic intrusions. Primary rock types are meta-sedimentary argillites, quartzites, and marbles.

The vermiculite deposit located at Vermiculite Mountain is located approximately 7 miles northwest of the town of Libby in the Rainy Creek drainage. The vermiculite deposit specific to the Libby Mine is classified as a deposit within a large ultramafic intrusion, such as pyroxenite plutons, which is zoned and cut by syenite or alkalic granite and by carbonatitic rock and pegmatite. The formation of vermiculite and asbestiform amphiboles in the Libby mine deposit, have been assessed to be the result of the alteration of augite by high-temperature silica-rich solutions.

#### **2.4.4 Soil**

Soil is largely derived from the pre-Cambrian rocks, which break down to form loamy soil composed of sand and silt with minor amounts of clay. The Libby valley area is somewhat enriched in clays due to its river valley location, and the dense forest of the region contributes organic matter to the soil. Much of the original soil in the area now occupied by the town of Libby has been modified by human activities. These include addition of vermiculite from the Rainy Creek Complex to the soil, reworking of the soil during construction, road building, railroad operations, gardening, processing of vermiculite (i.e., expansion), and other activities. Soil generally varies in color from tan to gray to black.

#### **2.4.5 Hydrogeology**

The Libby basin is hydrogeologically bound to the west by the pre-Cambrian bedrock, to the north by the Kootenai River and to the east by Libby Creek. The southern boundary of the basin extends under the high terrace of glacial lake bed sediments and with the alluvium of Libby Creek.

The sediments overlying bedrock in the vicinity of the town of Libby are of glacial, glaciofluvial or alluvial origins. The site stratigraphy is characterized by lenses of interbedded units consisting of gravels, sands, and silty to clayey gravels and sands. These units are the result of numerous episodes of alluvial and glacial erosion and deposition. Types of depositional environments likely to have existed in the Libby area include braided stream, overbank, splay, point bar, till, moraine, outwash, loess (Aeolian), channel, and lacustrine. These environments moved in time and space, occurred contemporaneously, cancelled each other out (by erosion) and varied drastically in the level of energy and capacity to sort the available clastic material. Specifics regarding the depth to groundwater at OU1 and the formations underlying OU1 are unknown.

#### **2.4.6 Description and Distribution of Waste Materials**

All asbestos is made up of long, thin fibers that are strong and heat-resistant. This has led to its use in thousands of products (such as building materials and heat-resistant fabrics). The fibers do not dissolve or breakdown in any way. They can remain airborne

for quite some time, but eventually settle into soil, sediment, or other materials (e.g. carpet).

Amphibole asbestos fibers are generally straighter and break apart more easily than other asbestos fibers. They are also believed to be more toxic than fibers from other types of asbestos. Tremolite-Actinolite Series Asbestos is the type of asbestos of concern in Libby. It is a distinct and relatively uncommon form of asbestos that is often referred to as tremolite, Libby Amphibole, or Libby asbestos (LA). LA is not a commercially viable mineral, but a contaminant in the vermiculite ore from the Libby mine.

Individual fibers are too small to be seen without a microscope. However, asbestos ore is occasionally seen locally, usually as decorative landscape rock or driveway material. The ore is waxy-silky white to greenish white, with fibrous strands running across the surface. Vermiculite is a silver-gold to gray-brown mineral that is flat and shiny in its natural state and puffed and dull in its expanded shape. It was discovered near Libby in 1881. In 1919, Dr. Edward Alley found that vermiculite expanded (or "popped") when heated. This created pockets of air that made the material suitable for use as insulation or as a soil amendment.

Dr. Alley founded the Zonolite Company and developed the mine and processing facility north of Libby, producing expanded vermiculite as Zonolite. Zonolite was lightweight, sturdy, and inexpensive. It was used in everything from construction to school craft projects. It is estimated that the Libby mine was the source of over 70 percent of all vermiculite sold in the U.S. from 1919 to 1990; and, over its lifetime, it employed more than 1,900 people. Grace bought the mine and processing facility in 1963 and operated it until 1990.

The asbestos veins in the ore body have contaminated most, if not all, of the material taken from the mine. Milling removed much of the asbestos from the finished product, but a significant amount remained. Because asbestos fibers are so small, this contamination is not evident with the naked eye. Not all vermiculite is contaminated. However, it is difficult to distinguish Libby vermiculite with the naked eye, thus all vermiculite should be handled with care.

# Section 3 Community Engagement Objectives

Based upon interviews with local community members and other interested parties (Section 5), EPA has developed the following objectives for community involvement and communication for the site:

- The CEP should provide up-to-date information that will be useful in planning, executing, and assessing the best ways to communicate with the public about activities at the Libby Asbestos Superfund Site in Lincoln County, Montana.
- The CEP should serve as a blueprint for identifying community concerns and planning two-way communication, so the community gets the information it wants in a format that best fits its needs.
- The CEP should aid community involvement staff to anticipate, identify, and acknowledge areas of conflict so that decisions can be made with full understanding of community views.
- The CEP should provide guidance to assist the CIC in using a proactive approach to provide information to the public when it is needed so they will have an increased awareness of the work EPA is conducting and will be better able to provide input to the process.
- The CEP should provide a framework for the CIC to formally involve local officials and other community representatives so that these community leaders have a chance to provide their input to the process.
- The CEP should define and communicate roles so that the community understands how the various parties work together.

A discussion of each of these objectives and the strategies EPA will use to implement them follows.

## 3.1 Provide Up-to-Date Information

Section 1 of the CEP is designed to provide interested parties with a current overview of what's going on at the site, including topical issues regarding the Superfund project, recent media accounts of site activities, the status of community groups related to the project, minutes of community meetings dealing with Superfund issues, and current construction statistics. The CEP appendices provide useful reference data, including

maps, contact information, and samples of outreach material. Time-sensitive information in the CEP will be updated periodically by the CIC and staff.

### **3.2 Identify Community Concerns and Plan Two-Way Communication**

By spending time in the community conversing with residents and attending community meetings, the CIC will learn what's on the minds of Lincoln County citizens. The CIC will then make a concerted effort to establish and maintain the proper forums in which residents and the Agency can address concerns in a constructive manner.

### **3.3 Identify Areas of Conflict**

Using the tools outlined in the CEP, the CIC should be able to anticipate, identify, and acknowledge a conflict between the Agency and a citizen who has a grievance. Key to accomplishing this is to have open communications conduit available to citizens in Lincoln County at all times, such as EPA's Information Center in Libby.

### **3.4 Use a Proactive Approach**

EPA's objective is to use a proactive approach to sharing information with the public. EPA is happy to listen to the concerns of the public and answer questions whenever possible. EPA will provide information to the public at appropriate times in the process with the goal of alerting the public to upcoming milestones and encouraging participation in the process wherever possible. EPA will try to provide information in a timely fashion to as many people as possible. This will ensure that the decisions made by EPA will benefit from a thorough knowledge of what is important to the community.

### **3.5 Framework to Involve Community Representatives**

As outlined later in this CEP, the CIC will attend most regularly scheduled community group meetings such as held by the TAG, CAG, City Councils, County Commission, and the City-County Health Board. In addition, EPA's Libby Project Team will regularly brief the County Commissioners, Libby City Council, and appropriate congressional staff.

To achieve this objective, EPA will ensure that public health and safety issues as well as opportunities for public participation in site decisions are well publicized. EPA will provide information on the Superfund process that is relevant to site decisions. EPA will assure that easy-to-read information regarding the status of site activities is provided to property owners and any other interested citizens (including elected officials). This information will enable stakeholders to keep up-to-date and be well-informed about site activities. The specifics of how this information will be made available to the public are provided in Section 5.3.

EPA's intention is to formally involve local officials and other community representatives in the Superfund process and maintain ongoing, two-way communication with the community. Community leaders have expressed an interest in EPA communicating regularly with them, informing them in advance of major decisions or events, and formally inviting them to public meetings and other public activities.

To accomplish this objective, EPA will make an effort to formalize communication of EPA site activities. The local officials, elected representatives, and community representatives have been added to the mailing list. A copy of this mailing list is available from EPA upon request. EPA will continue to offer the community opportunities to participate actively in meetings.

### **3.6 Define and Communicate Roles**

EPA's objective is to clearly define and communicate plans, schedules, responsibilities, costs, and its relationship with state and local governments. There are a number of stakeholders involved at the site, and it is important that EPA explain the role and authority of each and how their activities are coordinated, especially concerning the Montana Department of Environmental Quality (DEQ), which is EPA's primary governmental agency partner.

Major stakeholders and their roles and responsibilities are as follows:

- **EPA.** EPA is the federal agency responsible for implementing and enforcing environmental laws and regulations aimed at protecting public health and the environment. EPA will be the lead agency responsible for the sampling and cleanup activities related to the site.
- **State of Montana –DEQ.** DEQ is the state agency responsible for ensuring protection of the environment. DEQ's role at the site is as the support agency and EPA's partner, in fact DEQ is the lead agency for the cleanup in Troy (OU7). EPA will ensure that the DEQ Project Manager is included in substantive meetings about the entire site and will provide the DEQ Project Manager copies of all documents prepared for the public. DEQ will also provide input to EPA on investigation and cleanup activities.
- **Lincoln County Health Department.** The health department is responsible for addressing county public health and environmental issues. EPA will provide the health department contact with information that will ensure they are aware of sampling results, anticipated cleanup activities, and any other public health concerns stemming from the Superfund project that may arise within the community.

- **U.S. Forest Service (USFS) - Libby Ranger District.** The USFS is responsible for the public land they administer. A substantial amount of acreage controlled by the Kootenai National Forest is located within or adjacent to the site boundary. The District Ranger will be apprised of site activities so that the USFS can participate in cleanup decisions and protect its personnel from any exposure to LA.
- **U.S. Fish and Wildlife Service (USFWS)** is a relatively new bureau within the Department of the Interior. Its mission is working with others to conserve, protect and enhance fish, wildlife and plants and their habitats for the continuing benefit of the American people. The USFWS enforces Federal wildlife laws, protects endangered species, manages migratory birds, restores nationally significant fisheries, conserves and restores wildlife habitat such as wetlands, and helps foreign governments with their international conservation efforts. At the site, EPA is consulting with the USFWS for the ecological risk assessment.
- **Agency for Toxic Substances and Disease Registry (ATSDR).** ATSDR has no direct role in the Superfund work being conducted at the site. However, EPA will provide updates to ATSDR, as needed, and will notify them of public meetings and other events; and will include them on the list for press releases.
- **State of Montana – Department of Public Health and Human Services (DPHHS).** The Chief Medical Officer at the DPHHS serves as a resource for public health issues and also tracks the progress of environmental sites in Montana under a grant from the National Center for Environmental Health. Like ATSDR, DPHHS has no direct role in the Superfund work being conducted at the site. EPA will provide updates to DPHHS, as needed; will notify them of public meetings and other events; and will include them on the list for press releases.

# Section 4 Community Engagement Activities

This section provides an overview of community involvement activities conducted in the past and planned for the future at the site, partially as the result of what was learned during the interviews summarized in the next section. These activities are designed to provide information to community members and to ensure opportunities for them to be involved in the decision making process. EPA, as the lead agency for the site, will ensure full public participation in the Superfund cleanup process.

The activities described below are broken out into three categories:

- Activities required by CERCLA/SARA
- Pre-Record of Decision (ROD) site-specific support activities
- Post-ROD site-specific support activities

These activities are illustrated in Figures 4-1, 4-2, and 4-3.

## 4.1 Activities Required By CERCLA/SARA

The EPA has performed the following community involvement activities at the site as required by CERCLA/SARA:

- Designate a spokesperson
- Notify affected citizens
- Establish the Administrative Record file and information repositories
- Conduct community interviews
- Prepare and revise the CEP

A discussion of each of these activities follows.

### 4.1.1 Designate a Spokesperson

In the time since the site was proposed for listing as an NPL site, EPA and DEQ have each maintained one or more designated spokespersons to inform the community of actions taken, respond to inquiries, and provide information concerning the release of hazardous substances.

At present, the primary contacts for information at the site are:

- Victor Ketellaper, EPA Team Leader
- Mike Cirian, On-Site Project Manager
- Bonnie Lavelle, Remedial Project Manager - OU3
- Rebecca Thomas, Remedial Project Manager - OUs 1, 2, 5, 6 & 8
- Libby Faulk, EPA Community Involvement Coordinator
- Catherine LeCours (RPM OU 7) and Richard Sloan, MDEQ Project Officers

Mailing addresses, telephone numbers, and email addresses for these individuals are provided in Appendix D.

#### **4.1.2 Notify Affected Citizens**

As documented in the administrative record, EPA began notifying affected citizens in 1999 and has continued to update citizens regularly since then. EPA has also notified all county, state, and federal officials, as necessary. Many of the notifications have been made as mailers sent to all residents of Libby, and sometimes Troy. Contact information for specific officials is provided in Appendix D.

#### **4.1.3 Establish Administrative Record File and Information Repositories**

EPA has established an Administrative Record and an on-site Information Repository. The Administrative Record is housed at the EPA Records Center in Denver, Colorado. The Information Repository is a subset of documents from the Administrative Record. It is located at the EPA Information Center in Libby. Contact information is given in Appendix E.

The repository contains basic site information for public review, documents on site activities, technical site documents, this CEP, and general information about the Superfund program. EPA has placed notices in the local newspapers that notify the public of the availability of the Administrative Record file and identifies the Information Repository location and the hours of availability. That information has also been provided in fact sheets and proposed plans. The Administrative Record and Information Repository will continue to be updated as necessary.

#### **4.1.4 Conduct Community Interviews**

EPA is required to interview local officials, community residents, public interest groups and other interested parties to identify the community's specific information needs and

concerns, how best to communicate with residents and interested parties, and to determine the ways in which residents would like to become involved in the Superfund process. EPA conducted the interviews for this CEP in January and February 2009. The results are presented in Section 5.3.

#### **4.1.5 Prepare and Revise Community Engagement Plan**

EPA is required to prepare a CEP for all actions lasting longer than 120 days. EPA uses information obtained in the community interviews to develop the plan and to guide community involvement activities until the plan is complete. The community involvement plan is used by EPA in conducting community involvement activities as part of the Superfund process. EPA's initial CIP for the site was prepared in 2000. This document is the revised CEP. It will be updated, as needed.

### **4.2 Pre-ROD Site-Specific Support Activities**

The completion of a ROD is often a traditional opportunity for updating a CEP or revisiting community involvement strategies at a Superfund site, and it is a logical separation point for community involvement activities at the site.

The first two RODs completed for the site (for OUs 1 and 2) were signed in May 2010. Community involvement activities conducted at the site prior to that date included:

- Conducted community interviews and prepared the original CIP
- Established a local Information Center
- Established an Information Repository
- Established an on-site CIC Team to work with property owners and businesses
- Provided special support to the real estate community
- Funded a Technical Assistance Grant and provided training for TAG members
- Provided meeting support for the CAG and attended most meetings
- Sponsored and conducted numerous training classes targeted to specific stakeholder groups (e.g., asbestos abatement training for local contractors)
- Facilitated two community-wide redevelopment workshops
- Developed a mailing list
- Prepared and distributed multiple fact sheets

- Published numerous informational advertisements in the local newspapers and on local radio
- Developed and distributed a wide variety of targeted informational brochures and other written materials
- Developed a Libby Asbestos Site website
- Held numerous public meetings and availability sessions
- Created the O&M workgroup
- Regularly updated the Libby City Council and Lincoln County Commissioners
- Implemented several targeted informational campaigns
- Issued Proposed Plans, held a public hearing, and developed responsiveness summaries and RODs for OUs 1 and 2

A brief description of each of these activities follows.

#### **4.2.1 Conducted Community Interviews and Prepared CIP**

In 2000 EPA conducted community interviews with citizens living on or near the site. The objective of the interviews was to find out some general information about the properties and information on the property owner's concerns and issues with the site and how best to communicate with the public. Access and land use information was also gathered during those interviews. Using the information from those interviews, a Community Involvement Plan (CIP) was prepared and distributed in March 2001.

#### **4.2.2 Established a Local Information Center**

In December 1999, EPA established the widely used EPA Information Center or "Info Center" as it is known in Libby. The Info Center is the primary information resource for the Libby community on the project. Until 2009, the Info Center was located at 501 Mineral Avenue. In September 2009, it moved to 108 E. 9<sup>th</sup> Street. The Info Center office has been managed by the same person during business hours since its inception.



Original EPA Info Center

Since 2005, the EPA On-Site Project Manager has kept office hours at the Info Center. It is a resource for the community and visitors who need information on EPA's work in Libby, either in general or as it relates to their property. At the Info Center, residents can read documents, pick up copies of brochures, check the cleanup schedule, obtain information on specific properties, and meet with EPA staff.

Personnel at EPA's Info Center maintain a tracking system for EPA's HEPA Vacuum Distribution Program. They also manage the very large number of citizen inquiries with a tracking database that records and assign an inquiry to a specific team member for follow up, assign a completion date, and record the outcome and/or resolution.



Current EPA Info Center

### **4.2.3 Established an Information Repository**

EPA established an Administrative Record and an on-site Information Repository prior to the site's designation as an NPL site. The Administrative Record is housed at the EPA Superfund Records Center in Denver, Colorado. The Information Repository contains a subset of documents from the Administrative Record and is located at the EPA's Info Center in Libby.

The repository contains basic site information, documents on site activities, technical site documents, and general information about the Superfund program all for public review. This CEP will also be available at the repository. Information about the Administrative Record file and Information Repository was included in the site kickoff fact sheet, and will be repeated in most subsequent fact sheets, so that the general public is aware of the existence and location of the site documents. The Administrative Record and Information Repository will continue to be updated as necessary.

### **4.2.4 Established an On-site CIC Team to Work with Property Owners and Businesses**

Beginning in 2001, a team of on-site CICs was established to facilitate interaction between the field team and residents, so residential cleanups function smoothly. These CICs, were employees of EPA's prime contractor at the site, and were responsible for a myriad of issues that needed to be coordinated in order for sampling and cleanups to occur. These included: briefing residents on the scope of the work, providing information on temporary relocations, arranging for relocations, facilitating interactions between the field crew and residents, documenting the scope of work at the property and obtaining residential approval, coordinating with residents during their relocations, facilitating their return to the property, taking care of all outstanding issues, and ensuring that residents were reimbursed for their costs during relocation. As the number of cleanups per year increased, the CIC team evolved to a multi-person team of on-site CICs.



Meeting with residents

The business community also expressed concern about how cleanup events at their properties would affect their business. Their biggest concern was the fear of severe economic hardship if cleanups happened during the peak tourist seasons or other high-profit seasons, took too long, or drove away potential customers.

In response, EPA developed a proactive assistance program for businesses scheduled for remediation that meets with business owners who may undergo clean up, listens to their concerns, and works to limit any impacts. EPA's support included a dedicated field CIC committed to business cleanups whose job was to facilitate the remediation by helping the business owner through the process and working to limit impacts on the business.

### 4.2.5 Provided Special Support to the Real Estate Community

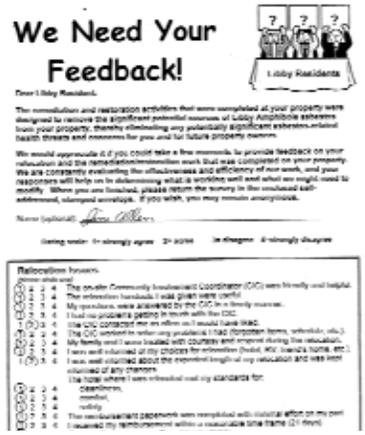
Libby leaders and the real estate community were concerned that the investigation and cleanup work being done by EPA would slow or stop home sales, make appraisals cumbersome, and make financing more difficult, if not impossible to obtain. Residents felt that new homebuyers would be scared of buying property in Libby and home values would plummet. The community wanted assistance from EPA to prevent or minimize these potential problems.

In response to this need, EPA developed an assistance approach for the real estate community that included writing hundreds of "comfort letters" to support real estate transactions. The letters describe the work done at the property in question. Homebuyers, appraisers, and mortgage lenders have found the letters to be very useful in answering some of the uncertainties associated with a Superfund cleanup.

EPA has also talked with loan officers, appraisers, potential buyers, etc. to provide the additional information necessary to complete mortgage transactions. In 2001, EPA arranged for representatives of federal mortgage insurers, lenders and loan underwriters to attend meetings in Libby, make presentations about what they look for in loan packages and answer the community's questions about effects of Superfund designation on real estate transactions. Finally, EPA makes the sampling of properties pending sale a priority, and regularly adjusts schedules to accommodate these requests.

### 4.2.6 Funded a TAG and Provided Training for TAG Members

EPA has funded a TAG in Libby since 2003. To further support the TAG, in 2004 EPA's contractor developed a very intense and audience-specific technical workshop aimed at helping TAG members understand the science behind analytical methods and ongoing



Post-cleanup satisfaction survey



Local real estate office.

risk management decisions at the Libby site. This included planning content, presentation materials, travel arrangements, etc. Support also includes advertisement of the meetings each month. Usually one or two EPA site team members attend the monthly TAG meetings.

#### **4.2.7 Provided Meeting Support for the CAG**

EPA has provided meeting support for the monthly CAG since its inception in 2000. This support has included arranging for and paying for the meeting space and a meeting facilitator. Support also includes advertisement of the meetings each month. Various site team members usually attend the CAG meetings every month.

#### **4.2.8 Conducted Numerous Training Classes Targeted to Specific Stakeholder Groups**

EPA has offered a variety of educational workshops for target audiences that included housing industry representatives (realtors and mortgage lenders) and area contractors. The goal was to ensure that development questions were answered and that contractors knew the issues related to preservation of the remedies EPA puts in place.

One of the meetings was a half-day meeting tailored to the needs and concerns of the real estate community (Appendix F.1). Realtors, mortgage lenders, and appraisers in Troy and Libby and members of the Northwest Montana Realtors Association were also invited to attend. The topics included: lender liability, “comfort letters”, disclosure to buyers and renters, general cleanup issues, and upcoming events and process. Eighteen real estate professionals from the Libby and Troy area attended the meeting. The interaction was productive for the real estate professionals and for EPA.

EPA also provided training classes for area contractors on the subject of asbestos abatement. These were held in 2006, 2007, 2008, 2009, and 2010. Support for the training included hiring qualified instructors, preparation of informational flyers and posters, and preparation and placement of advertisements (Appendix F.1) in local newspapers.

#### **4.2.9 Facilitated Two Community-wide Redevelopment Workshops**

EPA held two major workshops (in 2004 and 2006) at the site. These multi-day events had facilitated sessions with over 200 participants. Speakers were obtained from agencies and locations around the country and included two members of Montana’s U.S. Congressional delegation. Advertisements for the workshops are provided in Appendix F.2.



Newspaper story about the redevelopment workshop.

The response to these workshops and meetings from the local community was very encouraging:

- The workshops received positive press in the local media and an upbeat response from citizens.
- The Lincoln County Tourism Coalition was formed to spearhead future efforts. They have since received non-profit status. Their mission statement is enhancing tourism for Lincoln County through education, promotion, and infrastructure. They attended the last two Governor’s conferences on tourism.
- A brand name was developed for the Lincoln County area – Kootenai River Country, and the tag line for that brand is Montana’s Great Northwest – Rich, Rare, and Remote. These will be used to market the area. “Gateway Signs” with the brand name are now in place.
- Networking relationships were developed between locals with similar redevelopment interests and experts that could provide advice.
- Groups that had previously been unaligned came together to work for a common goal of improving the area’s economy. These include: snowmobilers, ATV enthusiasts, motorcyclists, and back country horsemen.
- A group composed primarily of downtown business people, Libby Revitalization, Inc., is working on a “Streetscape Project” to improve and enhance the downtown area of Libby.
- Attendance was good for both the real estate and contractor’s meetings.



The Libby gateway sign



A “Streetscape” layout.

#### **4.2.10 Developed a Site Mailing List**

EPA uses a commercially obtained mailing list of all people with mailing addresses within the Libby area zip-code (59263). A new list is purchased about every other year. In addition, a smaller mailing list of stakeholders who are located outside of the Libby area is also maintained (e.g., county, state, and federal elected officials and regulators associated with the site).

#### 4.2.11 Prepared and Distributed Multiple Fact Sheets

EPA has prepared and distributed numerous fact sheets to the community about the site since 2000. Examples of the fact sheets are provided in Appendix F.3.

The fact sheets include:

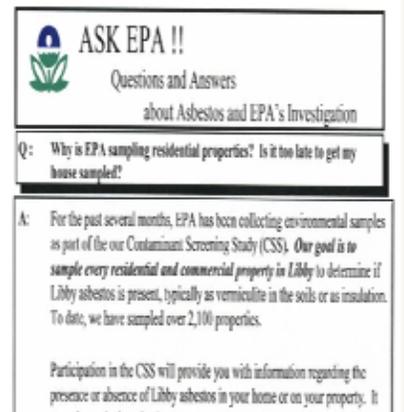
- Two-page *Annual Update* fact sheets for 2002, 2003, 2004, 2006, 2007, 2008, 2009, and 2010.
- A series of three fact sheets for homeowners, tradesmen, and contractors focused on dealing with asbestos during routine activities, October 2005
- *New Cleanup Contract*, August 2004
- *Libby Asbestos HEPA Vacuum Cleaner Program*, November 2003
- *Libby Sampling in 2002*, May 2002
- *Asbestos Removal at Local Schools*, August 2001

#### 4.2.12 Published Numerous Informational Advertisements in the Local Newspapers and on Local Radio

A series of question and answer advertisements have been developed and placed in the local newspapers. Entitled *Ask EPA*, these ads pose a question and provide an answer in a very concise format. In the early days of EPA's activity in the area, they were published biweekly on a regular basis. They are now published on an as needed basis. To date, over 200 *Ask EPA* ads have been written and placed. An example of a Q&A ad is provided in Appendix F.4.

EPA also prepared and placed an advertisement each month to announce the meeting times, places, and dates of the TAG, CAG, and Operations and Maintenance meetings. An example of the monthly meeting advertisement is provided in Appendix F.4.

EPA has also used paid advertisements in the form of newspaper columns targeted at specific issues of note at the site, ranging from general topics (e.g., what is Superfund) to very specific issues (e.g. cleanups of specific areas). To date, 15 columns have been written and placed in the three local newspapers (each about 500 words long). Feedback has been very positive.



A typical Q&A ad.

The *Superfund and You* columns are provided in Appendix F.5. Titles of those columns and dates placed are:

- *Why Should You Read This Column* - March 27, 2005
- *The Superfund Process, Part 1* – May 1, 2005
- *The Superfund Process, Part 2* – May 29, 2005
- *A Libby Progress Update* – June 26, 2005
- *Cabinet View Country Club* – July 25, 2005
- *Upcoming Libby Workshops* - August 28, 2005
- *EPA October Public Meeting* – September 25, 2005
- *What's the CAG/TAG Role?* – October 30, 2005
- *The Remedial Investigation* – November 27, 2005
- *Technical Memos of the RI* – January 1, 2006
- *The Feasibility Study* – January 29, 2006
- *The FS Evaluation Criteria* – February 26, 2006
- *Outdoor Ambient Air Sampling* – December 18, 2006
- *Residential Cleanup Status Letters* – April 19, 2007
- *EPA Needs Your Help* – May 23, 2007



The U.S. Environmental Protection Agency (EPA) began working on the Libby asbestos cleanup in 1999. We know from our interactions with local residents over the years that many of you are very interested in knowing what EPA is or will be doing in the future with regard to cleanup. We also know that many of you want a chance to provide input to the process, but are often unsure about the best ways to do this. Many people in Troy are just beginning to get involved.

Keeping the public up to date and engaged when the technical issues are so complex is challenging. EPA has written fact sheets, hosted public meetings, conferences and workshops, facilitated a Community Advisory Group, provided a Technical Assistance Grant, published regular Q&A ads, maintained an EPA Information Center, and more. As part of our

period following release of the plan will be an opportunity for residents to review and critique the plan.

Please take a few moments to read this column each month. We will provide timely information and alert you to opportunities to become involved in the process. Upcoming issues tentatively scheduled to be discussed include: overview of the Superfund Process, discussion of what we mean when we say "long-term cleanup," project update, information on a technical workshop for residents, discussion of the Proposed Plan for cleanup in Libby and Troy, and effective ways that you can provide comment to EPA. We welcome suggestions for topics you think would clarify the Superfund process and the public's role in it.

As part of our community involvement process, EPA will be

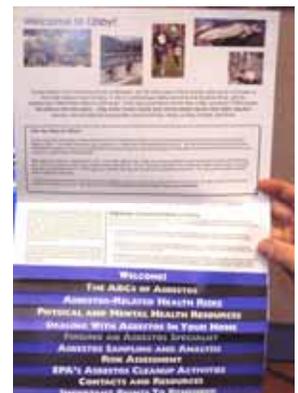
The first *Superfund and You* column.

#### 4.2.13 Developed and Distributed a Wide Variety of Targeted Informational Brochures and Other Written Materials

EPA has produced a variety of materials needed to educate and engage the public on the very serious health issues associated with the site. As needs arise, information pieces are designed for a wide variety of audiences – from children to adults – with wide ranging levels of environmental sophistication.

These pieces have included:

- A 12-page, staggered, color, brochure that provided comprehensive information in an easy-to-read product and was



targeted to local residents. The brochure covers a variety of topics related to asbestos and the cleanup in Libby. It presents risks in an objective manner. It shows that, while there is contamination in Libby, it is being addressed, and Libby is a great place to live.

- A 20-page, color piece on redevelopment targeted at the U.S. Congressional delegation (Appendix F.6).

- Residential information packets given to each resident, before and after remediation, to improve communication between the field team and residents. Packets contain information relevant to the home's remediation that is always available for reference. They reduced the resident's stress and cut project delays due to miscommunication. Examples of the materials within the packets are included in Appendix F.7.



Some materials in the residential information packets

- Business information packets modeled on the residential packets but tailored to provide the information needed by businesses.
- Magnets mailed to every homeowner in Libby to announce the establishment of the Libby Environmental Resource Specialist (ERS) position.
- A series of tri-fold brochures for residents to explain the restoration process and its limitations and to outline their responsibilities in maintaining the newly planted landscaping. These brochures include: *Outdoor Restoration at Your Property – An Overview for Libby Residents*; *Caring for Your New Lawn*; *Hydroseed Restoration* (Appendix F.8).
- A tri-fold brochure targeted at educating children and their parents about activities that can reduce the possibility of tracking dust (and possibly contamination) into their home. That brochure is titled: *Don't Let an Unwanted Visitor into Your Home* (Appendix F.9).

- Door tags to obtain information from people who were not home when the field team visited. Tags were hung on doors and provided contact information and asked for input from residents. Residents returned the filled in tag to the door, where they were collected by the field team. This minimized the number of visits made to each property.



Libby door tags

- Assorted other post cards, ads, posters, and flyers prepared with the goal of increasing public awareness to facilitate various sampling or other field events (Appendix F10). This included supporting the Activity Based Sampling (ABS) activities with fact sheets, flyers, and newspaper ads.



ABS sampling activity for which a fact sheet and ad was prepared.

#### **4.2.14 Developed a Libby Asbestos Site Website**

Because those interested in visiting or moving to Libby are likely to investigate Libby on the internet, EPA developed a Superfund website that is user-friendly and presents not just cleanup information, but the positive attributes that the Libby area has to offer. The website is based in large part on the brochure EPA developed as a community resource (see above). The address for the website is [www.epa.gov/libby](http://www.epa.gov/libby).

#### **4.2.15 Held Numerous Public Meetings and Availability Sessions**

At least six public meetings, five joint (e.g., with TAG or CAG) public meetings, four public availability sessions with EPA scientists, and two listening sessions have been held by EPA since 2004. These meetings are advertised well in advance (Appendix F.11) A few of these meetings were covered by television network affiliates from Kalispell or Missoula, at least one was also broadcast simultaneously on the local radio stations, and one meeting was actually covered by a public television station from Japan. It is EPA's intention to hold a public meeting approximately every two months in Libby.



EPA leading a public meeting

Annual public meetings updating the public on the work conducted to date and planned for the future have been held on: June 9, 2004; October 11, 2005; June 13, 2006; March 7, 2007; May 22, 2008; June 22, 2009, and February 8, 2010. EPA has occasionally made special presentations at regularly scheduled CAG or TAG meetings. Topics and dates for these meetings have been: EPA's 2008 work plan at a CAG meeting on January 10, 2008; a special epidemiological presentation at a TAG meeting on February 12, 2008; an update on sampling at the Libby Mine at a TAG meeting on August 12, 2008; a discussion of risk at a TAG meeting on September 9, 2008; and an update on the Stimson Mill at a TAG meeting in September 23, 2008. These joint events were all announced to the public in special advertisements.

Public availability sessions that offer the public a chance to talk with EPA's scientific experts in an open house setting have been held in: September 2007, September 2008, December 2009, and February 2010. Two "listening sessions" were sponsored by EPA for ATSDR in Libby on August 6, 2008.

#### **4.2.16 Created the Operations and Maintenance Workgroup**

The Libby O&M workgroup was established uncharacteristically early in the Superfund process in order to get citizens informed and comfortable with concepts such as institutional controls (ICs). The group is comprised largely of local government employees who will be responsible for maintaining the integrity of the Superfund remedies after EPA has completed its work in the area. This workgroup has made a major contribution to the development of ICs for the site.

#### **4.2.17 Regularly Updates City Council and County Commissioners**

In an effort to improve communication at the site in recent years, EPA has made it a point to regularly provide briefings to the Libby City Council and Lincoln County Commissioners (these updates are made at the regularly scheduled commission meetings at a frequency of about once a month).

#### **4.2.18 Implemented Several Targeted Informational Campaigns**

EPA has focused considerable energy on educating the public about specific upcoming events at the site. The first educational event was in 2005 and involved a series of advertisements and meetings designed to educate the public on the Superfund process in anticipation of a ROD in early 2006.

The second campaign was designed to launch the Libby Area ERS position in 2007. This included preparation of a letter and a refrigerator magnet that were mailed to all residents of Libby. To save money, the materials were included in a previously-scheduled mailing of sample results. Copies of the materials

developed are provided in Appendix F.12.



The ERS magnet

The third campaign was conducted in 2009 and was designed to educate the public on the Superfund process and the upcoming release of the Proposed Plans for OUs 1 and 2. This was followed by the public comment period, public hearing, and the issuance of the RODs for those OUs in early 2010. The campaign involved the creation and placement of a series of ads depicting the *Road to the ROD* (Appendix F.13).

#### **4.2.19 Issued Proposed Plans, Held a Public Hearing, and Developed Responsiveness Summaries and RODs for OUs 1 and 2**

EPA issued a Proposed Plan for OU1 on September 7, 2009 and for OU2 on September 14, 2009. These plans were mailed to all residents of the Libby area. A public hearing for the proposed plans was held on September 28, 2009, at which EPA gave a brief presentation and the public had an opportunity to provide oral or written comment. The

30-day comment period was subsequently extended to January 16, 2010. A copy of the Proposed Plan for OU1 and OU2 is provided in Appendix G.

### **4.3 Post-ROD Specific Support Activities Planned to Date**

As illustrated by the list of activities conducted to date at the site, EPA's CI program at the site is very robust. EPA intends to continue this high level of support throughout the remedial design/remedial action phase of the project.

Anticipated activities include:

- Maintain the EPA Info Center in Libby and the associated Information Repository
- Continue to provide an on-site CIC Team to work with property owners
- Continue to provide specific cleanup support to individual businesses and to specific business sectors (e.g. realtors)
- Continue to fund the TAG and to provide meeting support for the CAG
- Continue to conduct training targeted to specific stakeholder groups, as needed
- Continue to maintain a mailing list (to include Troy) and to prepare and distribute fact sheets
- Continue to prepare and publish informational advertisements in local newspapers and on local radio
- Continue to develop and distribute targeted informational brochures and other written materials
- Maintain the Libby Asbestos Site website
- Continue to hold public meetings and public availability sessions
- Continue to regularly update the Libby City Council and Lincoln County Commissioners
- Issue Proposed Plans, hold public hearings, and develop responsiveness summaries and RODs for the remaining OUs on the site
- Where possible, address any remaining topics of concern raised in the Community Interviews

- To the extent possible under Superfund authority, ease the economic burden of EPA leaving town by promoting and facilitating economic redevelopment in Lincoln County.

The full extent of these site-specific support activities will depend on resources available. Refer to Section 1 for the most current information on community engagement activities at the site.

#### **4.4 Putting Things in Perspective**

It should be noted that on a weekly basis the CIC receives numerous calls and e-mails from citizens in Libby and across the nation (and one e-mail from Ireland!). These are usually information requests, but often they are inquiries from people who are considering moving to Libby and they want to know if they should be concerned about the health effects of the asbestos contamination. Once in a while, a call comes from someone who has just been diagnosed with the death sentence of mesothelioma and is asking what they can do or how they protect their children from a similar fate. These are encounters that require a very delicate touch from a CIC.

The Libby Asbestos Superfund Site is one of the highest profile hazardous waste sites in the country. The Libby Asbestos web site receives more hits than any of the Agency's web offerings. The \$250,000,000 settlement with Grace was, at the time, the largest civil settlement in the history of the Agency. Sadly and most importantly, more people have died as the direct result of exposure from to the contaminant of concern than at any other Superfund site in the history of the Agency. This litany of superlatives attached to the Libby Asbestos Site leads to intense scrutiny from the media and government officials at all levels, both internally and externally.

Normally, EPA adds a site to the NPL because of a measureable, potential threat to human health and the environment. Unfortunately, the threat is very real in Libby and many people continue to suffer and die in Lincoln County as a result of the asbestos contamination. This imparts an atmosphere of urgency to EPA's work at the site – our remedies in Libby will literally save lives. Moreover, the toxicity of Libby Amphibole asbestos has not yet been measured or quantified, though EPA scientists are pursuing multiple investigations to make that determination. These conditions create an extremely sensitive and sometimes volatile working environment for the CIC. In spite of these conditions and because of these conditions, it is an enormous challenge and privilege to be a part of the Libby Project Team.



# **Section 5 Community Profile, Interviews, and Concerns**

This section discusses the demographics of the area in the vicinity of the site. It also describes the community interview process used by EPA to prepare this CEP and summarizes the concerns and suggestions of the community.

## **5.1 Community Profile**

The following information on Libby was obtained from the 2000 U.S. Census. Additional detailed information on the social and economic trends of Lincoln County as a whole was reviewed as part of the evaluation of Libby's environmental justice standing. The results of that evaluation and a socioeconomic profile for Lincoln County are provided in Appendix H.

### **5.1.1 Population Statistics**

Libby population statistics are based on the last census in 2000. At that time, there were 2,626 people, 1,132 households, and 669 families residing in Libby. The population density was 2,062 per square mile. There were 1,264 housing units.

There were 1,132 households out of which 25.4 percent had children under the age of 18 living with them, 43.6 percent were married couples living together, 11.8 percent had a female householder with no husband present, and 40.9 percent were non-families. 36.9 percent of all households were made up of individuals and 18.3 percent had someone living alone who was 65 years of age or older. The average household size was 2.20 and the average family size was 2.87.

In Libby, the population was spread out with 24 percent under the age of 18, 6 percent from 18 to 24, 22 percent from 25 to 44, 25 percent from 45 to 64, and 22 percent who were 65 years of age or older. The median age was 43 years. For every 100 females there were 88 males.

The median income for a household in the city was \$24,276, and the median income for a family was \$29,615. Males had a median income of \$30,174 versus \$19,675 for females. The per capita income for the city was \$13,090. About 10 percent of families and 16 percent of the population were below the poverty line, including 23 percent of those under age 18 and 13 percent of those ages 65 or over.

The racial makeup of the city was 96 percent White, 0.2 percent African American, 1.3 percent Native American, 0.6 percent Asian, 0.5 percent from other races, and 1.9

percent from two or more races. Hispanics or Latinos of any race were 1.2 percent of the population. English is the primary language in Libby.

## **5.1.2 Community Government and Local Services**

Libby is the county seat of Lincoln County. As such, it offers a full range of city and county services. Local, state, and federal government contacts relevant to the site are provided in Appendix C.

### **5.1.2.1 City of Libby**

City government is comprised of a mayor and six elected commissioners. The City Council meets weekly in the Council Chambers in City Hall and also has a less formal weekly breakfast meeting. City Hall is located at 952 E. Spruce Street in Libby. Office hours are Monday through Friday, 8am to 5 pm, except holidays.

City departments and offices include: City Clerk, Building Inspector, Street Department, Police Department, Libby Volunteer Fire Department, Sewage Treatment Plant, and Water Department. The City also has a Board of Adjustments, an Airport Board, and a Police Commission. The City's website is [www.cityoflibby.com](http://www.cityoflibby.com).

### **5.1.2.2 Lincoln County**

County government is comprised of three elected commissioners, representing the districts of Libby, Eureka, and Troy. The commission meets every Wednesday morning, generally in Libby. On the third Wednesday of each month, the meeting is held in Eureka. The county offices are at the main courthouse (512 California Avenue in Libby) and at the north annex in Eureka. Office hours are Monday through Friday, 8am to 5 pm, except holidays.

County departments and offices include: Clerk and Recorder, County Nurse, Clerk of District Court, County Attorney, Emergency Management, Environmental Health, MSU-Extension Agent, Personnel, Planning, Schools, Treasurer, Victim and Witness, Weed Management, and WIC. The county's website is [www.lincolncountymt.us](http://www.lincolncountymt.us).

The county also has three public libraries. Lincoln County Libraries consists of the main library in Libby, Montana and two branch libraries in Eureka, Montana and Troy, Montana. The service area is Lincoln County and Northwest Montana (over 20,000 people). The Lincoln County Public Library recently celebrated its eighty-fourth anniversary. The Libby Library is located at 220 west 6th Street (293-2778) [library@libby.org](mailto:library@libby.org).

### **5.1.2.3 State of Montana**

Several State of Montana offices are also located in Libby and provide services to the local population. These include the Assessor/Appraiser, District Court, Department of

Natural Resources and Conservation, Drivers Examiner, Family Services, Fish Wildlife and Parks, Highway Department, Highway Patrol, Juvenile Probation, and Kootenai Job Services. Contact information for these offices is available at [www.lincolncountymt.us/state\\_offices](http://www.lincolncountymt.us/state_offices).

### 5.1.3 Local News Media Outlets

Local residents have direct access to media outlets from Lincoln County, Kalispell, Missoula, and Spokane (newspapers, radio, and television). Contacts are provided in Appendix I.

- **Newspapers.** There are three local newspapers within the Town of Libby. *The Western News* publishes twice a week, and the *Kootenai Valley Record* and *The Montanian* publish weekly. EPA has accounts with all three papers and regularly places advertisements in them. EPA also occasionally runs an ad in the *Daily Interlake* in Kalispell (90 miles east of Libby).
- **Radio.** Libby has a local radio station, KLCB (1230AM)/KTNV (101.7FM). EPA has an account with this station and has run advertisements for public meetings on occasion.

EPA's use of these media has generally been limited to the local newspapers and radio stations. This is likely to continue because the available television sources are not local, expensive, and have odd schedules in Lincoln County. On occasion, there has been television coverage of events at the site (e.g., when the site was added to the NPL).

### 5.1.4 Internet Access and Usage

It is difficult to determine the level of computer literacy and access in Lincoln County. EPA works with an estimate that maybe 50 percent of the population uses the internet and this figure will only increase in the future. The CIC should frequently revisit the question of whether or not use of the internet and the various social networking sites could be an effective way of communicating with residents of Lincoln County.

### 5.1.5 Education

Libby School District #4 has three schools located in the Town of Libby, Montana. There are approximately 1,200 students in the district.

- **Libby Elementary School** (formerly Asa Woods Elementary). This school is located at 700 Idaho Avenue. It serves approximately 370 students in Grades PK through 4. The student to teacher ratio is relatively low for Montana (13 to 1).

- **Libby Middle School.** This school is located at 101 Ski Road. It serves approximately 420 students in Grades 5 through 8. The student to teacher ratio is relatively low for Montana (13 to 1).
- **Libby High School.** This school is located at 150 Education Way. It serves approximately 460 students in Grades 9 through 12. The student to teacher ratio is average for Montana (17 to 1).

There is also an Alternative high school program within the district. The Libby Campus of the Flathead Valley Community College offers adult college education courses at its campus at 225 Commerce Way in Libby.

### 5.1.6 Community Organizations and Groups

There are numerous community organizations and groups in Libby that are not related to the Superfund project. Several have information regarding their mission listed on the internet:

- **CARD Outreach Recovery Assistance Program (CORA), St. John's Lutheran Hospital.** CORA provides free information, referral and short term counseling about asbestos exposure to those in Libby, Troy and Eureka. It provides confidential support in learning to cope with illness, regain control, and recognize and manage chronic stress. Contact information is Tanis Hernandez, 293-9274 or [tanis@libbyasbestos.org](mailto:tanis@libbyasbestos.org).
- **Heritage Museum.** The mission is “the recovery of and preservation of historical culture of the Lincoln County area.” The Heritage Museum opened in 1978, manned by volunteers. Special grants and assistance from agencies, private businesses, individuals and numerous fund raisers helped build the Museum. Contact information is: 1367 US Highway 2 South, Libby, 293-7521, [museum@libby.org](mailto:museum@libby.org).
- **Center for Asbestos Related Disease (CARD).** The CARD is a non-profit community-based specialty clinic that evolved in response to raised awareness of the wide spread asbestos exposure in the Libby, Montana area that was revealed in 1999. CARD is devoted to healthcare, research, and outreach to benefit all people impacted by exposure to Libby Amphibole asbestos and CARD is governed by a volunteer community-based board of directors. Their mission is “to provide long-term screening, health monitoring, disease diagnosis, specialized asbestos healthcare and counseling to all people impacted by Libby Amphibole asbestos.” In addition, CARD provides outreach, advocacy, disease prevention and research to benefit all people impacted by asbestos.” Contact information is: 214 E. Third Street, Libby, 293-9274, [libbyasbestos.org](http://libbyasbestos.org)

- **Libby Chamber of Commerce.** The Libby Area Chamber of Commerce is an organization of businesses and individuals whose mission is to enthusiastically promote economic and community development through a positive attitude which fosters health, growth, and an improved business climate for the greater Libby Area. Contact information is: 905 West 9<sup>th</sup>, Libby, MT 59923, 293-4167.
- **Kootenai Heritage Council.** The mission is "to preserve and transmit our heritage, enhance culture and contribute to the social, educational and economic well being of Lincoln County through the education, performance, enjoyment, viewing and understanding of all forms of artistic activity." Contact information is: 111 East Lincoln Boulevard, Libby, MT 59923, 293-9643, [khcenter@frontiernet.net](mailto:khcenter@frontiernet.net).

Other community organizations in Lincoln County include:

- |  |   |
|--|---|
| ■ Achievements Inc., 101 Mineral Avenue, Libby 293-8848                                | ■ Lincoln County Asbestos Victims Relief Organization, 293-5535               |
| ■ American Legion, 319 California Avenue, Libby  | ■ Literacy Volunteers of America, Lincoln County, PO Box 327, Libby, 293-2778 |
| ■ ARD Net Partners,  | ■ Mental Health Center, 1469 Us Highway 2 South, Libby,                       |
| ■ Elks BPOE, 220 W 4th Street, Libby, MT, 293-7828                                     | ■ Northwest Montana Human Resources, 933 Farm To Market Road, # B, Libby      |
| ■ Families in Partnership. 83 Collins Avenue, Libby                                    | ■ Opportunity Resources, 952 E Spruce Street, # 202, Libby                    |
| ■ Kootenai Kiwanis Club, PO Box 1279, Libby  | ■ Senior Citizens Center, 206 E 2nd Street, Libby                             |
| ■ Kootenai Valley Partners Habitat for Humanity, PO Box 19, Libby                      | ■ Sons of Norway, 165 Garden Road, Libby                                      |
| ■ Libby Community Interagencies (smoking cessation), 105 W Oak Street, Libby, 293-3951 | ■ U Serve Libby, Inc., P.O. Box 908, Libby, 293-8260                          |
| ■ Libby Food Pantry, 724 Louisiana Avenue, Libby                                       | ■ Veterans of Foreign Wars Post 1548, 114 W 2nd St, Libby, 293-7316           |
| ■ Libby Lions, 293-4838  |   |

## **5.2 Community Interview Process**

To develop a CEP that reflects community interests and concerns, EPA depends heavily upon information obtained during community interviews. In January and February 2009, EPA conducted face-to-face interviews for this CEP.

Interviews were conducted with 25 people, which is within the typical range of number of interviews for a CEP, especially given the population of the area. Each interview lasted about 30 minutes to an hour. EPA read the interview questions to the interviewee and took notes throughout the interview to capture the information provided.

## **5.3 Community Interview Results**

People participating in the interview were told that the interviews were being conducted so EPA could get feedback to determine community interests and to find out which information sources work best for locals. The information gathered would be used to develop outreach methods that would best fit the needs and wishes of the community.

### **Interview questions were:**

- Do you understand why EPA and MDEQ are doing cleanups in Libby and Troy?
- Do you have any concerns about our work being done? Is there anything about the work that you like or dislike?
- When you want to know what is going on with the project or have questions, whom do you contact? Where do you get most of your information about the site? Have you visited EPA's website?
- Do you feel you are receiving enough information about the site? Is there other information you would like to receive from EPA/MDEQ?
- What is the best way to get information to the community? Is email an appropriate way to provide information? Do you have email access and would you like to receive information about site cleanup?
- What issues or concerns would you like to see EPA/ MDEQ address? Have we been responsive to the public's right to know at the site?
- Are there issues or decisions regarding the project that you would like more involvement in?
- Do you think Libby and Troy will see an increase in development once EPA has finished the cleanup?

- How do you think recontamination of a property should be prevented in the future, and would a City or County ordinance regulating future excavations work?
- Are you aware of the health risks that can occur if a person disturbs an area that has been cleaned, and do you think the community is aware of them? Are you aware of the ERS program that can be called for free advice on proceeding with remodeling or excavation projects?
- Are you aware of the health screening options that are available to Lincoln County residents?
- Have you attended any TAG or CAG meetings? What could be done to make the meetings more attractive to the local citizens? Where are the best locations for the meetings?
- Are there other people who you think would like to speak to us?
- Is there anything else you would like to add?

Responses from the community interviews are summarized below and grouped according to similar themes.

### **5.3.1 Do you understand why EPA/DEQ are doing cleanups in Libby and Troy?**

All of the interviewees indicated that they understood why the cleanup was being done. Reasons given included: mitigating vermiculite in buildings because of a real or perceived potential to affect people's health.

One person stated that corporate America did not have the best interest of the community in mind and now the taxpayers are paying for the cleanup. The federal government is making an extensive effort to attempt to cleanup Libby. However, the answer to "how clean is clean?" is probably years away. Another person said that someone had to do the cleanup and the State doesn't have any money, so the cleanup fell to EPA.

### **5.3.2 Do you have any concerns about the site work? Is there anything about the work that you like or dislike?**

Many of the people interviewed (25) shared concerns about the work being done and likes/dislikes with EPA. Their responses were:

- Decisions about work on City property (e.g., a ROD at OU1 in 2010) should not be made without discussions with the City Council. Announcing plans at public

meetings is not an adequate substitute for presentations to the property owner. The cleanup is not thorough enough. EPA has to have a plan that doesn't change with every change of management. Many people believe that EPA is trying to get in and out as quickly as possible. EPA needs to follow up on committees that are planned (e.g., operations and maintenance [O&M]).

- There is not much opportunity for businesses to get involved in cleanup. Businesses bid on parts of remediation (e.g., carpet replacement) but are not chosen and don't get feedback on who was picked and why.
- Concerned about exposure to dust generated by dump trucks that were decontaminated with water that was not properly filtered.
- Concerns are primarily health issues. Where does cleanup end? Is less than 1 percent asbestos safe? Is it safe to leave vermiculite in place? How about exposure to people in the area when vermiculite is removed during remodeling?
- Glad EPA removed the subcontractor who was doing removals incorrectly last year.
- House keeps getting pushed back, and she has two children who stir up a lot of dust. Delayed cleanup is ruining their chances for long-term good health. It's not fair to ask her to keep them from riding their dirt bikes or playing outside, and neighbors are not happy with the dust and the potential for contamination.
- Let people know early if they are on the list for that year or not. A lot of people have delayed planting gardens etc. only to find out that they are not on that year's list after all. It is a hardship to many people.
- There needs to be more common sense in cleanup decisions. Why are they cleaning up flowerbeds that have very little vermiculite when there are still homes with vermiculite inside that have not been cleaned? Also concerned about rumor that EPA was only going to be cleaning up 60 properties this year.
- All vermiculite should be removed from walls and carpets should be removed. Sampling methodology is good, and EPA has learned a lot. Concerned about certain aspects of toxicity model – using the right manner of exposure and timelines may not be comparable to human health risk.
- The cleanup should be done more quickly. This would require a larger commitment of people and money, but could be done. Also, recreational properties need to be cleaned up. Everything needs to be more comprehensive. Have the playgrounds been cleaned?

- It would be nice to have a definitive answer on “how clean is clean.” The public expects an answer, even if the science is evolving and no answer is available yet.
- Is EPA cleaning up things that don’t need cleaning? Their flowerbeds were sampled because of visible vermiculite, even though the soil was from a nursery in Idaho and any vermiculite would not have been from the Grace mine.
- Someone has to stick up for the health of future rail workers. Any railroad-led cleanup will be superficial and just enough to get by. Visual inspection won’t catch vermiculite settled into rail ballast. You must dig under rails to confirm.

Some people indicated that they did not have concerns. One said this was because he had modest expectations for what it is possible to achieve given available funding and thinks everything is probably fine. Another said that there are always questions because it is a scary situation, but you learn to live with it because everything in life has risks.

### **5.3.3 When you want to know what is going on with the project or have questions, whom do you contact? Where do you get most of your information about the site? Have you visited EPA’s website?**

Interviewees named a variety of contacts for questions on the project, with the majority choosing either Linda Newstrom (CDM Federal Programs [CDM] Office Manager) or Mike Cirian (EPA On-Site Project Manager) at the EPA Info Center. Specific individuals (or other methods of communication) cited as contacts and the number of times they were mentioned is provided below:

- |                       |                                |
|-----------------------|--------------------------------|
| ■ Linda Newstrom (14) | ■ Victor Ketellapper (1)       |
| ■ Mike Cirian (5)     | ■ Paul Lammers (1)             |
| ■ Newspapers (4)      | ■ CDM CIC (1)                  |
| ■ CDM staff (2)       | ■ Catherine LeCours (1)        |
| ■ Ted Linnert (1)     | ■ Ask EPA Q&A newspaper ad (1) |

Eight interviewees said they had used the EPA website. Two people had not used the website, but used the internet for other things and would use the website if they needed to. One person indicated that they talked with EPA and community members for their information.

### **5.3.4 Are you receiving enough information about investigation and cleanup? Would you like to receive other information from EPA/DEQ?**

All of the interviewees responded that they were or usually were receiving enough information from EPA about the investigation and cleanup. Several people also said that they knew where to get additional information if they needed it. Property owners who have had their homes cleaned up said that EPA is much better at getting comfort letters to homeowners than they used to be.

Numerous people had suggestions for other information that they would like to receive. These suggestions included:

- Detailed information for the City Council at their Wednesday meetings.
- Information on what is safe and what isn't.
- Daily briefing of residents undergoing cleanup on progress that was made each day and exactly who is doing the work at their house for each task.
- Additional information on reducing risk in yards. Also, more raw data, not just summaries.

### **5.3.5 What is the best way to get information to the community? Is email a good way to provide information? Do you have email access and would you like to receive news about site cleanup?**

Most people thought newspapers were the best way to get information to the public. The methods cited and the frequency with which they were cited are listed below:

- |                   |                                     |
|-------------------|-------------------------------------|
| ■ Newspapers (14) | ■ O&M Meetings (1)                  |
| ■ Radio (5)       | ■ Public meetings (2)               |
| ■ Fact sheets (3) | ■ Presentations to local groups (2) |
| ■ Direct mail (5) | ■ Phone network (1)                 |

Several people thought EPA was doing a good job at informing the public. One person said it is hard to get the public to pay attention. Radio and newspapers are good ways, as are O&M meetings. Press releases are an important way to get information out. Also, try radio interviews (*Voices of the Kootenai*).

Most people preferred a combination of information delivery methods – almost all of which involved newspapers and one or more other techniques. Suggestions were: newspapers and public meetings; newspapers and mailings to people’s homes; newspapers, meetings with the Commission, and talks to local organizations; newspapers, flyers, and a local noon radio talk show; newspapers and fact sheets; newspapers and special meetings; newspapers and direct mail; newspapers, Duane’s news program on the radio, and direct mail; and newspapers and the Troy newsletter.

Two people did not think newspapers were a good tool. They preferred that information be sent directly to homes as letters or fact sheets and also suggested a phone network to get information out. One group interviewed thought that EPA’s previous large brochure was very good for handing out to newcomers and suggested that EPA make sure the Chamber of Commerce knows who to refer people to for answers.

People with an opinion on e-mail updates were almost evenly divided in their belief that it would be effective in Libby. The biggest advocates for e-mail were working people who used e-mail in their job. Of twelve interviewees that had an opinion, two did not have e-mail access and three didn’t think enough Libby residents had e-mail access to make using e-mail worthwhile. The remainder had e-mail access and thought it could be a useful tool, although it should be not the main communication method.

### **5.3.6 What issues or concerns would you like to see EPA/DEQ address? Have we been responsive to the public’s right to know at the site?**

Several people interviewed had issues or concerns they wanted EPA to address. A few people thought that EPA changes focus too often in the project. An example given was the planned ROD for OU1. The interviewees wanted to know how EPA could do a ROD without doing a risk assessment. They wondered if there was a shift within EPA to focus on containment rather than removal. At least one interviewee wanted EPA to address the issue of “How clean is clean?” Others asked to be updated on progress of the project.

None of the respondents indicated that EPA or DEQ had been unresponsive to their requests for information. Interviewees stated that the agencies seem to be upfront with the public on information. They felt that EPA was not holding anything back and has tried to do a good job in getting info to the public. Several people indicated that EPA had answered all their requests (even if the answers might not always be popular). A businessperson indicated that the local CICs have been good about ensuring that work with local businesses runs smoothly.

One interviewee said that the EPA people directly involved at the community level are doing as well as possible, but that the problem with EPA is with those in Washington, DC. It was also stated that EPA is responsive and is trying to take care of the problem

affecting people economically, socially, and physically. EPA can only do what they are allowed. People are very angry and rightly so, but the government is not responsible for putting the contamination here.

### **5.3.7 Are there issues or decisions regarding the project that you would like more involvement in?**

Most the interviewees did not want to be more involved than they currently were in the project. A few indicated that if they really wanted to be more involved, they knew how to increase their involvement.

For those who had an interest in being more involved, suggestions were:

- Any work on City property
- Use of local businesses
- Contamination on the railroad in Libby and former BNSF roundhouse in Troy
- Windblown contamination from the mine
- Status of the research done during the year
- Toxicology and epidemiology work.
- Timing of public involvement– is the public involved at the right time (i.e., in document preparation)

### **5.3.8 Do you think Libby and Troy will see an increase in development once EPA has finished cleanup?**

Most respondents indicated that the area would likely see an increase in development, but that it probably would not be dramatic. This was because the “Superfund Stigma” and the work EPA was doing did not seem to have much of a negative impact on the current community. On the contrary, people were moving in and property values were holding, even with the national economic problems. Additionally, EPA and their contractors were spending a lot of money, and they were actually an economic driver in the community and that money would be missed when EPA eventually finished their work and moved on. A few people voiced concerns about the potential from harm if a public health emergency was declared.

Most people thought that the major impediment to redevelopment was the economy. There needed to be industry and a job base to support development and to draw people to the area. Communication, transportation, and economic issues are what keep Libby low on the list of potential sites for companies to relocate. There has always been high

unemployment, and the economy has been depressed. This is not related to Superfund. Hopefully some small businesses can get established and provide more of a stable economic base. Some people said they didn't want too much growth.

A lot of people spoke of what a beautiful place Libby was to live and how that would eventually help with redevelopment. It was said that many people moving to Libby were older (retirees) who do not have the concerns regarding asbestos that young people have. Property values have gone up because of this. People are moving here because of the scenery. Libby had faced hard economic times before and had survived.

Some people said that the big scare related to vermiculite in the community seems to be over. It doesn't seem to be keeping people from moving in. Asbestos issues might make an occasional difference to an individual, but that person probably had other underlying issues unrelated to Superfund. The initial "hysteria" that was evident when the site was first listed is greatly reduced. The local media need to address some of the positive results, such as housing sales. The public has it in their heads that the vermiculite is stopping the sale of their home, but that is not true.

### **5.3.9 How do you think recontamination of a property should be prevented in the future when new development occurs, and would a City or County ordinance regulating future excavations work?**

People understood that it was not possible to remove all contamination from the area and that there would be contamination below ground when EPA left. They generally agreed that some form of regulation would be needed to keep people from recontaminating already cleaned areas after EPA leaves. They were also almost unanimous in stating that compliance with those regulations had to be free or people would ignore them. Also, O&M regulations probably won't work with all people, especially in Libby where there was a large percentage of the population who didn't want any government involvement in what they were allowed to do.

Many people indicated that it was going to be up to the government to pay for any future O&M type cleanup that was needed. They believed that if someone found vermiculite while digging on their property, that person shouldn't be expected to handle it correctly if it was going to cost them money. If it cost money to dispose of contaminated soil properly, people would not do it, especially if they didn't have kids. People seemed almost unanimous in their belief that locals would not hesitate to recontaminate an area if the alternative was paying for inspection or disposal.

One person thought that the state needed to do something about septic regulations that allow a homeowner to replace their own tanks, as this was an activity that was likely to expose buried vermiculite. Another thought there would need to be both education and

enforcement in order for the O&M to be successful. Controls had to be placed on the movement of soils and there had to be liability for ignoring regulations. The City was concerned that they would be liable for O&M if they pass regulations that limit what can be done on property.

**5.3.10 Are you aware of the health risks that can occur from disturbing an area that has been cleaned, and do you think the community is aware of those risks? Are you aware of the ERS who you can call for free advice on proceeding with remodeling or excavation projects?**

Everyone interviewed said they were aware of the public health risks and thought the community was aware also. By contrast, only three people interviewed knew about the ERS position, although several said it was a great idea to have such a position. People suggested that the ERS be explained to all people when their homes are cleaned. One person suggested that the ERS should be a government representative, since it deals with public health.

**5.3.11 Are you aware of the various health screening options that are available to Lincoln County residents?**

Almost all interviewees said they were aware of the health screening options available to them, although many of them did not have information that was completely up to date. Many of the people knew about the CARD clinic. However, people think it is funded by Grace and is only for those with asbestos related disease. People did not know that the CARD and MASA were two different organizations.

Several people had been tested for asbestos related disease and one had donated blood for an asbestos study. A few people thought that the CARD clinic was no longer operating and that the screenings were over. One person had worked at the Stimson Mill and had a screening while he was there. It was stated that anything that EPA can do to support the CARD would buy them good will in the community.

**5.3.12 Have you attended any TAG or CAG meetings? What could be done to make the meetings more attractive to local citizens? Where are the best locations for these meetings?**

Respondents in nine interviews had been to one or more CAG or TAG meetings, and they said that they generally did not find them to be productive. Reasons cited included: monopolization of the meetings by a small minority, ongoing bickering, anger, lack of control by the meeting facilitator. People suggested that speakers did not always represent the general public and that the meetings were no longer places for people to go to get information, but were a place for some people to argue their point of view.

Some people interviewed said they hoped that the situation could be improved because the meetings had served a useful purpose in the community in the beginning of the project. It was also suggested that the change in the meetings may be due to a natural evolution. The CAG was supposed to be an information conduit for the community, and there was a great need for that in the beginning. Because that need has now lessened, there are fewer people interested in the CAG. Thus, the CAG is dominated by people who make the remaining asbestos issues the focus of their lives. They do not represent the community, and the function of providing project information to the community has been replaced by lobbying, which is not the purpose of the CAG.

Of the people who indicated they had not been to a CAG or TAG meeting, most said it was due to a lack of time or interest. People spoke of the difficulty in carving out time, but said that they knew about the meetings through ads in the newspaper. Other people indicated they did not go because they had heard from others that the meetings were not productive and were gripe sessions. Several people said that they had attended the larger public meetings in Libby or the meetings at the Senior Citizen's Center in Troy.

Suggestions for improving meeting attendance were to put a flyer about them in the info packets that are given to homeowners, offer refreshments, and limit discussion on a given topic so that debate doesn't drag on. There were no suggestions for other venues, and people who had an opinion on the venue thought the current locations were fine.

### **5.3.13 Are there other people you think would like to speak to us?**

Most people could not think of any other people they would like EPA to interview. EPA did receive five suggestions for further interviews and followed up on them.

### **5.3.14 Is there anything else you would like to add?**

Most people did not have anything else to add when asked this question. However, EPA did receive several responses:

- The City is going to put together its own action plan so that EPA knows what the City wants done. They hope to have it done by February 9, 2009.
- Glad that EPA is here and cleaning up the site. It is going to be better than it was in the beginning. People honestly are trying to do what needs to be done.
- How will removals be handled after EPA is gone? What about site boundaries? How far out do they go?
- It is good that EPA is in Libby and trying to make a difference.

- Has concerns related to the declaration of a Public Health Emergency. Would it really provide long-term health care? If not, there would be a terrible stigma with no benefit.
- Why don't homes with children get cleaned up before the homes of older people? There is more risk to children.
- There are too many people elsewhere who think it is not safe to live or even drive through Libby. This just isn't true. Many of the people who had ARD who died were old and they had other issues that killed them – obesity, heart disease, heavy smoking. Libby is a safe place to live. There is no public health emergency in Libby. We don't need any more bad publicity.
- Residents might be interested in knowing which of the properties near them have already been cleaned, are on the cleanup list, or do not require cleanup.
- Appreciates the Info Center and Linda for assistance to lenders, comfort letters, etc. Would like to know if the sampling process damages the yard, or if only very small samples are taken.