

**VOLUNTARY RECRUITMENT PROGRAM**  
**COMMUNICATION AND INFORMATION COLLECTION STRATEGY**  
**FOR**  
**OPERABLE UNIT 4 AND OPERABLE UNIT 7**  
**OF THE LIBBY ASBESTOS SUPERFUND SITE**

February 14, 2011

Prepared by:

**MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY**  
Remediation Division  
P.O. Box 200901  
Helena, Montana 59620

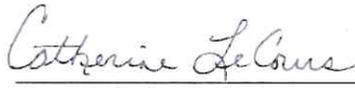
**VOLUNTARY RECRUITMENT PROGRAM**  
**COMMUNICATION AND INFORMATION COLLECTION STRATEGY**  
**FOR**  
**OPERABLE UNIT 4 AND OPERABLE UNIT 7**  
**OF THE LIBBY ASBESTOS SUPERFUND SITE**

**Prepared by:**

**MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**REVIEWS AND APPROVALS**

DEQ Project Officer:

  
Catherine LeCours

Date: 02-14-2011

EPA Remedial Project Manager:

  
Victor Ketellapper

Date: 2-14-2011

## **DISTRIBUTION LIST**

<b><u>Name</u></b>	<b><u>Responsibility</u></b>	<b><u>Affiliation</u></b>
Catherine LeCours	DEQ Project Officer	Montana Department of Environmental Quality – Helena, Montana
Victor Ketellapper	EPA Remedial Project Manager	Environmental Protection Agency

Additional copies of the Voluntary Recruitment Strategy can be made available to the above-listed persons for further distribution within their respective agencies.

# CONTENTS

<u>Section</u>	<u>Page</u>
<b>DISTRIBUTION LIST .....</b>	<b>II</b>
<b>ACRONYMS AND ABBREVIATIONS.....</b>	<b>V</b>
<b>1.0 INTRODUCTION.....</b>	<b>1</b>
1.1 RECRUITMENT OBJECTIVES .....	1
1.2 RECRUITMENT SCHEDULE AND DELIVERABLES .....	1
<b>2.0 RECRUITMENT BACKGROUND.....</b>	<b>2</b>
2.1 LIBBY ASBESTOS SITE HISTORY .....	2
2.2 RECRUITMENT FOCUS .....	2
2.3 RECRUITMENT HISTORY .....	3
<b>3.0 DATA QUALITY OBJECTIVES .....</b>	<b>4</b>
3.1 STEP 1 – STATE THE PROBLEM.....	4
3.2 STEP 2 – IDENTIFY THE DECISION.....	4
3.3 STEP 3 – IDENTIFY THE INPUTS TO THE DECISION .....	5
3.4 STEP 4 – DEFINE THE BOUNDARIES OF THE STUDY .....	5
3.4.1 <i>Spatial Bounds</i> .....	5
3.4.2 <i>Temporal Bounds</i> .....	5
3.5 STEP 5 – DEVELOP DECISION RULES .....	5
3.6 STEP 6 – SPECIFY TOLERABLE LIMITS ON DECISION ERRORS .....	5
3.7 STEP 7 – OPTIMIZE THE INVESTIGATION DESIGN .....	6
<b>4.0 VOLUNTARY RECRUITMENT PROGRAM IN OU4.....</b>	<b>7</b>
4.1 PREPARATION ACTIVITIES .....	7
4.1.1 <i>Pre-Contact Planning</i> .....	7
4.1.2 <i>Inventory Equipment and Supplies</i> .....	8
4.2 RECRUITMENT FIELD ACTIVITIES .....	8
4.2.1 <i>Select Property and Contact Owner</i> .....	9
4.2.2 <i>Review Property Information Summary</i> .....	9
4.2.3 <i>Complete Voluntary Recruitment Questionnaire</i> .....	9
4.2.4 <i>Acquire Signed Access Agreement</i> .....	10
4.2.5 <i>Post-visit Follow Up</i> .....	10
<b>5.0 VOLUNTARY RECRUITMENT PROGRAM IN OU7.....</b>	<b>11</b>
5.1 PREPARATION ACTIVITIES .....	11
5.1.1 <i>Pre-Contact Planning</i> .....	11
5.1.2 <i>Inventory Equipment and Supplies</i> .....	12

## CONTENTS (Cont.)

<u>Section</u>	<u>Page</u>
5.2 RECRUITMENT FIELD ACTIVITIES .....	12
5.2.1 <i>Select Property and Contact Owner</i> .....	13
5.2.2 <i>Review Property Information Summary</i> .....	13
5.2.3 <i>Complete Voluntary Recruitment Questionnaire</i> .....	13
5.2.4 <i>Acquire Signed Access Agreement</i> .....	13
5.2.5 <i>Schedule Inspection</i> .....	13
5.2.6 <i>Post-visit Follow Up</i> .....	14
<b>6.0 DOCUMENT AND DATA MANAGEMENT .....</b>	<b>15</b>
6.1 TABULAR DATA .....	15
6.2 DOCUMENTS AND RECORDS .....	15
<b>REFERENCES.....</b>	<b>16</b>

### Figures

- 1 OPERABLE UNITS 4 AND 7, LINCOLN COUNTY, MONTANA
- 2 ZONES MAP OF OU4
- 3 ZONE MAP OF OU7

### Appendix

- A OU4 VOLUNTARY RECRUITMENT TEMPLATES  
- PROPERTY INFORMATION SUMMARY, QUESTIONNAIRE, ACCESS AGREEMENT
- B OU7 VOLUNTARY RECRUITMENT TEMPLATES  
- PROPERTY INFORMATION SUMMARY, QUESTIONNAIRE, ACCESS AGREEMENT

## ACRONYMS AND ABBREVIATIONS

CICs	Community Involvement Coordinators
DEQ	Montana Department of Environmental Quality
DQO	Data quality objective
EPA	U.S. Environmental Protection Agency
LA	Libby Amphibole asbestos
OU	Operable unit
Strategy	Voluntary Recruitment Strategy
USACE	US Army Corps of Engineers

## **1.0 INTRODUCTION**

This document serves as the voluntary recruitment strategy for Operable Units (OU) 4 and 7 of the Libby Asbestos Superfund Site. This strategy will guide the personal contacts and information collection methods to be performed by the United States Environmental Protection Agency (EPA), the Montana Department of Environmental Quality (DEQ), and the United States Army Corp of Engineers (USACE), or their contractors (collectively referred to as “the agencies”). The document describes the methods for identification of appropriate properties; out-reach to individual property owners and/or occupants; information collection; and scheduling activities that will be implemented to ensure the completion of follow-up Libby amphibole asbestos (LA) investigations of the subject properties.

The strategy is organized as follows:

- Section 1 – Introduction
- Section 2 – Recruitment Background
- Section 3 – Data Quality Objectives
- Section 4 – Voluntary Recruitment Program in OU4
- Section 5 – Voluntary Recruitment Program in OU7
- Section 6 – Document and Data Management

### **1.1 RECRUITMENT OBJECTIVES**

The primary objective of the Voluntary Recruitment Program is to obtain access from property owners to allow the completion of LA investigations on residential, commercial, industrial and public properties within the bounds of OU4 and OU7. Secondary objectives include confirmation of existing property information held by the agencies and collection of supplemental information from property owners.

### **1.2 RECRUITMENT SCHEDULE AND DELIVERABLES**

Given the size of OU4, the recruitment schedule will be geographically based, with a limited number of focus areas per year. For OU7, recruitment activities are expected to begin in March, 2011 with the majority of the work effort anticipated to be completed by mid-May, 2011. However, activities described in this strategy may occur at any time in the future. At least 736 properties in OU4 and 324 properties in OU7 have been identified as candidates for recruitment activities.

## **2.0 RECRUITMENT BACKGROUND**

### **2.1 LIBBY ASBESTOS SITE HISTORY**

From the 1920s until 1990, an active vermiculite mine and associated processing operations were located in Libby, Montana. While it was in operation, the mine may have produced 80 percent of the world's supply of vermiculite (EPA 2005). The processed and exfoliated vermiculite was primarily used for insulation in buildings and as a soil amendment. The Libby vermiculite deposit includes amphibole asbestos. For decades, the processing of vermiculite ore and generation and disposal of waste materials resulted in the widespread presence of amphibole asbestos throughout the Libby community. In 1999, EPA Region 8 dispatched an emergency response team to investigate media reports of abundant amphibole asbestos and high rates of asbestos-related disease in Libby. Subsequent environmental investigations have found asbestos throughout many areas in and around Libby that include a form of amphibole asbestos known as LA.

Typically, the LA found in southern Lincoln County comes from one, or some combination of, primary sources including vermiculite mining waste, vermiculite ore, vermiculite processing waste, bulk residuals from vermiculite processing, LA-containing rock, or LA-containing vermiculite insulation. Residential use of vermiculite from the Libby mine, primarily as building insulation and as a soil amendment, was common. In some cases, vermiculite insulation has been found in interior and exterior walls due to sifting from the attic. In rare cases, vermiculite has been found as an additive in building materials such as plaster, mortar, and concrete.

The LA-containing soil is generally a result of the use of vermiculite for soil amendment in flowerbeds and gardens, grading, or backfilling of utilities.

Given the random use and distribution of LA throughout southern Lincoln County, it is very important for the agencies to inspect as many if not all properties within OU4 and OU7 for the presence of LA or LA-containing materials.

### **2.2 RECRUITMENT FOCUS**

Libby, Montana is located in southern Lincoln County, Montana and has been designated as OU4 of the Libby Asbestos Superfund Site. 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. The OU4 boundary was developed to include the majority of populated, developed areas in and around Libby.

Troy, Montana is located 18 miles northwest of Libby, Montana and has been designated as OU7 of the Libby Asbestos Superfund Site. OU7 is defined as residential, commercial, industrial and public properties in and around the City of Troy. The OU7 boundary was selected to ensure that investigations captured most of the older homes in and around Troy that are more likely to contain LA or LA source materials.

Figure 1 shows the location of both OU4 and OU7 in relation to Lincoln County, Montana.

### **2.3 RECRUITMENT HISTORY**

In 2001, EPA and their contractors began property inspections in OU4. DEQ and their contractors began inspections in OU7 in 2007. These preliminary inspections identified properties which were eligible for removal actions to reduce potential exposure to LA for the residents. As of December 2010, EPA has performed inspections in approximately 3,700 of roughly 4,500 total properties identified in OU4 and DEQ has performed inspections at 908 of 1,232 total properties identified in OU7. Historical out-reach to property owners has included door-knocking, advertisements in local papers, flyers posted throughout towns, public meetings, and direct mailing. While the inspection and removal action programs are voluntary, EPA and DEQ strive for a high level of participation by property owners.

In the spring of 2011, EPA and DEQ will increase the efforts to contact the owners and/or occupants of the remaining uninspected properties within OU4 and OU7 to solicit participation in the inspection program. From the upcoming inspections, EPA and DEQ will identify properties with possible LA contamination, perform additional removal design investigations, and subsequently perform removal actions as appropriate.

### **3.0 DATA QUALITY OBJECTIVES**

The Data Quality Objective (DQO) process is a series of planning steps designed to ensure that the type, quantity, and quality of environmental data used in decision-making are appropriate for the intended purpose. The DQOs presented in this section were developed in accordance with EPA guidance (EPA 2006).

DQOs help to clarify the study objectives, define the most appropriate data to collect and the conditions under which to collect the data, and specify tolerable limits on decision errors that will be used as the basis for establishing the quantity and quality of data needed to support decision-making. The DQOs are used to develop a scientific and resource-effective design for data collection.

The DQO process consists of seven steps; output from each step influences the choices that will be made later in the process. These steps include:

1. State the problem
2. Identify the decision
3. Identify the inputs to the decision
4. Define the study boundaries
5. Develop decision rules
6. Specify tolerable limits on decision errors
7. Optimize the investigation design

#### **3.1 STEP 1 – STATE THE PROBLEM**

The purpose of this step is to describe the problem to be addressed. Despite extensive out-reach activities, there are remaining properties in both OU4 and OU7 that have not been inspected for the presence of LA or LA-containing materials. These properties need to be evaluated for their eligibility in the removal program and future remedial actions at the site.

#### **3.2 STEP 2 – IDENTIFY THE DECISION**

This step identifies the questions the recruitment is designed to answer and what actions may result. The principal questions are included on the Voluntary Recruitment Questionnaires for OUs 4 and 7 (Appendices A and B). The decision and action, based on the outcome of the recruitment, is permission to access the identified properties in the future for investigation, evaluation, and a determination whether removal or remedial actions are necessary.

### **3.3 STEP 3 – IDENTIFY THE INPUTS TO THE DECISION**

The purpose of this step is to identify the information and measurements that need to be obtained to resolve the decision statements. A completed Voluntary Recruitment Questionnaire and signed Access Agreement (Appendices A and B) by the property owner will allow the agencies to obtain information needed to determine whether future investigation, removal, or remedial actions are necessary.

### **3.4 STEP 4 – DEFINE THE BOUNDARIES OF THE STUDY**

This step specifies the spatial and temporal boundaries of the voluntary recruitment activities.

#### **3.4.1 Spatial Bounds**

The spatial boundaries of the recruitment are the boundaries of OU4 and OU7.

#### **3.4.2 Temporal Bounds**

The temporal boundaries of this recruitment are March, 2011 through the duration of the Superfund project. At no time in the future will the agencies turn down the opportunity to recruit additional properties for investigation.

### **3.5 STEP 5 – DEVELOP DECISION RULES**

The primary objective of the recruitment is to obtain access to uninvestigated properties to allow investigation. If access is allowed at a property, then enough information has been collected to fulfill the objectives of the recruitment. If a signed access agreement is not obtained, the agencies will confirm existing information as presented in the Property Information Summary and acquire additional information about a specific property through the Voluntary Recruitment Questionnaire (Appendices A and B).

### **3.6 STEP 6 – SPECIFY TOLERABLE LIMITS ON DECISION ERRORS**

The tolerable limits on decision errors, used to establish performance goals for the data collection design, are specified in this step. Potential decision errors are not significant because the property owner either completes the questionnaire and/or signs the access agreement, or not. Upon receipt of the signed access agreement, the agencies will schedule an investigation, pursuant to the specific property identification and inspection process of each OU.

### **3.7 STEP 7 – OPTIMIZE THE INVESTIGATION DESIGN**

This step identifies a resource-effective data collection design for generating data that are expected to satisfy the DQOs. The data collection design is described in detail in the remaining sections of this strategy.

## **4.0 VOLUNTARY RECRUITMENT PROGRAM IN OU4**

This section summarizes activities that will be performed in support of the Voluntary Recruitment Program specific to OU4. The recruitment program is designed to increase participation in the inspection and removal (if appropriate) processes through personal contact and communication with the property owner and/or occupant. This section also provides standard operating procedures and data collection tools to be used by the field team members. The agencies anticipate the majority of this work will be performed by the agencies' Community Involvement Coordinators (CICs) already assigned to the Libby site.

The site-specific Comprehensive Health and Safety Plan and addendums should be consulted to determine health and safety protocols for performing recruitment work. Each agency or contractor may complete addendums or separate Health and Safety Plans specific for the recruitment activities as deemed necessary. Field forms are included as appendices. All recruitment activities will be performed in accordance with this strategy.

### **4.1 PREPARATION ACTIVITIES**

Prior to beginning the personal contacts, the agencies will host a recruitment kickoff meeting. The meeting will involve all field managers, CICs, and database managers for both OU4 and OU7 and include training on health and safety and field forms (from preparation to data entry and quality control), brainstorming for potential problems, and answering any questions that may arise.

#### **4.1.1 Pre-Contact Planning**

Before the CICs mobilize to recruit property owners for investigations, EPA's ESAT contractor will prepare property maps that identify candidate parcels and corresponding Property Information Summaries (example template in Appendix A). Properties will be bundled for recruitment in OU4 using removal zones (Figure 2).

Candidate properties are properties within the bounds of OU4 that have not had an investigation performed on the property. Property owners that have historically refused access shall be included in this recruitment program and contacted again, if appropriate. There may be some instances where homeowners have been adamant they did not want to be contacted again. In addition, properties that have only been contacted through the Environmental Resource Specialist or U-Dig responses are also candidates for this recruitment program. Properties who have previously deferred any participation (e.g., willing to have inspection done but not scheduled yet) may also be contacted again through this process.

Property boundaries and other identifying details will be gathered from public databases (cadastral) and projected onto air photographs. Information currently held by the agencies will be gathered and summarized on the Property Information Summary form by EPA's ESAT contractor. This Summary form includes, but may not be limited to, the following information (if known):

- Identifier(s) for EPA Geographic Unit(s)
- Identifier and address for all associated properties
- Contact information for property owner (name, mailing address, phone numbers)
- Summary of previous property activities

USACE's contractors will also perform a visual review of on-site documentation as necessary to obtain additional information before contact is made with homeowners.

EPA's RAC contractor will create new property identifiers (ad-numbers) and hard copy property folders as necessary.

#### **4.1.2 Inventory Equipment and Supplies**

An inventory of project-procured equipment and supplies will be conducted prior to field work. The following equipment is required for recruitment activities conducted under this strategy:

- Field Maps
- Summaries of known property information
- Blank Voluntary Recruitment Questionnaire
- Blank Access Agreement
- Project Personnel Identification Cards
- "Sorry We Missed You" flyers and painters tape
- Indelible ink pens
- First Aid kit
- Digital Camera
- Cellular phone and/or communication radio

#### **4.2 RECRUITMENT FIELD ACTIVITIES**

This section describes the methods and procedures that will be used to complete the recruitment activities. The recruitment activities are performed to personally contact property owners, confirm existing and capture additional information about a property, obtain a signed access agreement, and schedule a property investigation.

The following is a summary of field activities that will be performed by the agencies during the recruitment process:

- Select property
- Contact property owner in person
- Review Property Information Summary
- Complete Voluntary Recruitment Questionnaire
- Acquire signed Access Agreement

#### **4.2.1 Select Property and Contact Owner**

EPA's RAC contractor will identify and distribute candidate recruitment properties in their capacity as Property Operations Coordinator (see EPA/MTDEQ's Inter-agency Roles and Responsibilities). EPA's ESAT contractor will provide technical support.

CIC's will, as much as possible, contact property owners and work through all properties in a single zone before moving on to the next zone. Before any contact is made, the CICs will review the Property Information Summary for each property. The CICs will use all methods available to them (phone, property visit, visit place of employment) to personally contact the property owner. The CICs may perform the remainder of the activities in person or over the phone as appropriate and convenient for the property owner. This effort may be completed during non-business hours and on weekends. If the CICs visit the property, either with or without an initial telephone contact, they will visit in two-person teams and photograph the "front" of the property/building for the files.

#### **4.2.2 Review Property Information Summary**

The CICs will personally review ALL property information provided on the Property Information Summary with the property owner. Any changes or new information will be recorded directly on the Property Information Summary form.

#### **4.2.3 Complete Voluntary Recruitment Questionnaire**

The CICs will directly communicate with the property owner, ask the relevant questions and complete the Voluntary Recruitment Questionnaire (example template in Appendix A) for the property owner and/or occupant.

#### **4.2.4 Acquire Signed Access Agreement**

The CICs will discuss the inspection process with the property owner and/or occupant and obtain a signed access agreement (Appendix C). The CICs will bring blank access agreements and complete the form with property-specific information for signature by the property owner. The CICs will provide the property owner with a copy of the signed access agreement. If the property owner is either un-willing to allow access for an inspection (classified as a refusal) or would like to request a deferral, the CICs will indicate such on the Voluntary Recruitment Questionnaire.

#### **4.2.5 Post-visit Follow Up**

Prior to submission to the Voluntary Recruitment Coordinator, the CICs will review all paperwork to ensure completeness. The CICs will also review the Questionnaire to identify any questions or concerns needing to be addressed for the property owner. The CICs will follow up with any outstanding questions or concerns and document their actions as appropriate.

## **5.0 VOLUNTARY RECRUITMENT PROGRAM IN OU7**

This section summarizes activities that will be performed in support of the Voluntary Recruitment Program in OU7. The recruitment program is designed to increase participation in the inspection and removal (if appropriate) processes through personal contact and communication with the property owner and/or occupant. This section also provides general operating procedures and data collection tools to be used by the field team members. The agencies anticipate the majority of this work will be performed by the agencies' Community Involvement Coordinators (CICs) already assigned to the Libby site.

The site-specific Comprehensive Health and Safety Plan and addendums should be consulted to determine health and safety protocols for performing recruitment work. Each agency or contractor may complete addendums or separate Health and Safety Plans specific for the recruitment activities as deemed necessary. Field forms are included as appendices. All recruitment activities will be performed in accordance with this strategy.

### **5.1 PREPARATION ACTIVITIES**

Prior to beginning the personal contacts, the agencies will host a recruitment kickoff meeting. The meeting will involve all field managers, CICs, and database managers for both OU4 and OU7 and include training on health and safety and field forms (from preparation to data entry and quality control), brainstorming for potential problems, and answering any questions that may arise.

#### **5.1.1 Pre-Contact Planning**

Before the CICs mobilize to recruit property owners for investigations, DEQ's contractor will prepare detailed property maps that identify candidate parcels and corresponding Property Information Summaries (example template in Appendix A). Candidate properties are properties within the bounds of OU7 that have not had an investigation performed on the property. Property owners that have historically refused access shall be included in this recruitment program and contacted again. In addition, properties that have only been contacted through Environmental Resource Specialist or U-Dig responses are also candidates for this recruitment program. Properties who have previously deferred any participation (e.g., willing to have inspection done but not scheduled yet) may also be contacted again through this process.

Property boundaries and other identifying details will be gathered from public databases (cadastral) and projected onto air photographs. Information currently held by the agencies will be gathered and summarized on the Property Information Summary form. This Summary form includes name of property owner, mailing address, physical address (post-E911 conversion), legal description of property, phone

numbers, project-specific property identification numbers (AD), and any historical correspondence or communications (e.g., TOAD and Hotline entries) between the agencies and property owners. Project-specific property folders will be created as necessary.

### **5.1.2 Inventory Equipment and Supplies**

An inventory of project-procured equipment and supplies will be conducted by the CICs prior to field work. The following equipment is required for recruitment activities conducted under this strategy:

- Property-specific air photograph
- Property-specific Property Information Summary
- Blank Voluntary Recruitment Questionnaire
- Blank Access Agreement
- Project Personnel Identification Cards
- “Sorry We Missed You” flyers and painters tape
- Indelible ink pens
- First Aid kit
- Digital Camera
- Cellular phone and/or communication radio
- Calendar

## **5.2 RECRUITMENT FIELD ACTIVITIES**

This section describes the methods and procedures that will be used to complete the recruitment activities. The recruitment activities are performed to personally contact property owners, confirm existing and capture additional information about a property, obtain a signed access agreement, and schedule a property investigation.

The following is a summary of field activities that will be performed by the agencies during the recruitment process:

- Select property
- Contact property owner in person
- Review Property Information Summary
- Complete Voluntary Recruitment Questionnaire
- Acquire signed Access Agreement
- Schedule investigation

### **5.2.1 Select Property and Contact Owner**

The candidate properties in OU7 have been mapped and placed into geographical zones (see Figure 3). CIC's, as much as possible, will select a zone and then work through all properties in a single zone before moving on to the next zone. Before any contact is made, the CICs will review the Property Information Summary for each property. Specifically, the CICs will review any historical correspondence and communication to become familiar with the history of the property and owners. The CICs will use all methods available to them (phone, property visit, visit place of employment) to personally contact the property owner. The CICs may perform the remainder of the activities in person or over the phone as appropriate and convenient for the property owner. This effort may be completed during non-business hours and on weekends. If the CICs visit the property, either with or without an initial telephone contact, they will visit in two-person teams and photograph the "front" of the property/building for the files.

### **5.2.2 Review Property Information Summary**

The CICs will review property information provided on the Property Information Summary with the property owner and/or occupant. Any changes or new information will be recorded directly on the Property Information Summary form.

### **5.2.3 Complete Voluntary Recruitment Questionnaire**

The CICs will either ask the property owner and/or occupant to complete, or the CICs will ask the questions and complete the Voluntary Recruitment Questionnaire (example template in Appendix B) for the property owner and/or occupant. More than one Questionnaire may be completed for a single property (e.g., owner and tenants).

### **5.2.4 Acquire Signed Access Agreement**

The CICs will discuss the inspection process with the property owner and/or occupant and obtain a signed access agreement (Appendix B). The CICs will bring blank access agreements and complete the form with property-specific information for signature by the property owner. The CICs will provide the property owner with a copy of the signed access agreement. If the property owner is un-willing to allow access for an inspection, the CICs will indicate such on the Voluntary Recruitment Questionnaire.

### **5.2.5 Schedule Inspection**

Upon receipt of a signed access agreement, the CICs will immediately schedule the property for an inspection at a time that is convenient for the property owner and/or tenant.

### **5.2.6 Post-visit Follow Up**

Prior to submission to the Voluntary Recruitment Coordinator, the CICs will review all paperwork to ensure completeness. The CICs will also review the Questionnaire to identify any questions or concerns needing to be addressed for the property owner. The CICs will follow up with any outstanding questions or concerns and document their actions as appropriate.

## **6.0 DOCUMENT AND DATA MANAGEMENT**

Document and data management during the recruitment activities will be under the supervision of the Field Document Manager and the Field Database Manager. The CICs will generate field data either on paper or electronic copies of the forms provided in Appendix A and Appendix B of this strategy. The Voluntary Recruitment Coordinator will review all forms and provide them to the Field Document Manager and/or the Field Database Manager as appropriate. All field data will be managed according to EPA reporting requirements specified in the EPA Data Management Plan (EPA 2011).

These reporting requirements were developed to help satisfy EPA's cleanup objectives at the Libby Asbestos Superfund Site. The reporting requirements guide data collection processes and data reporting procedures for spatial information, tabular data, and documents (EPA 2011).

### **6.1 TABULAR DATA**

The Field Database Manager will be required to format and submit all tabular data in accordance with EPA reporting requirements (EPA 2011). Operational electronic data will be QC reviewed and entered into EPA's database within 3 business days after the data are collected (see EPA's Data Management Plan). This will ensure that EPA has consistent and up-to-date information.

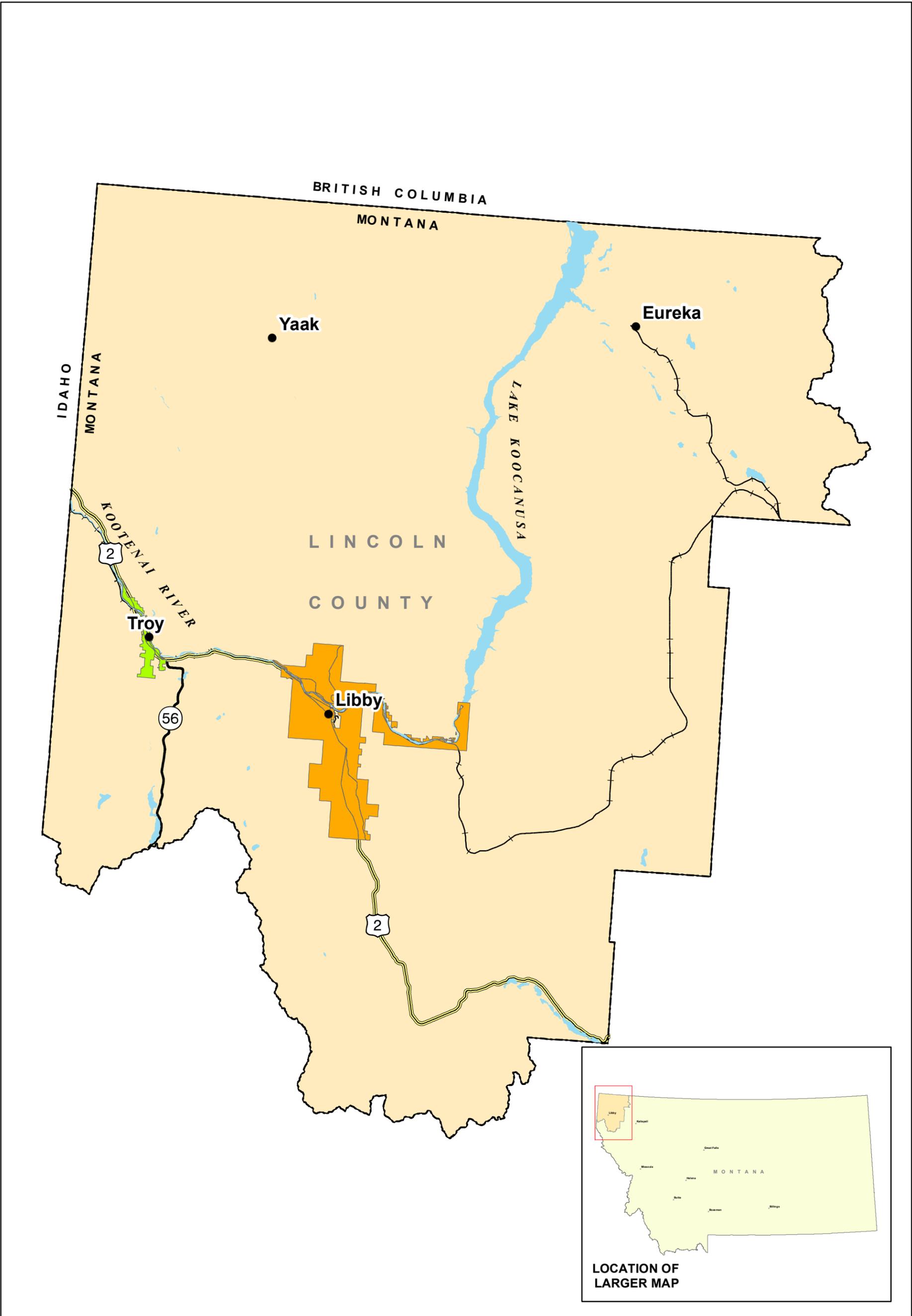
### **6.2 DOCUMENTS AND RECORDS**

The Field Document Manager will be required to format and submit all operations documents and records in accordance with EPA reporting requirements (EPA 2010). Documents must be submitted to the appropriate Records Center within 10 business days of completion of recruitment activities at a given property.

## REFERENCES

- U.S. Environmental Protection Agency (EPA). 2005. Region 8 Background Factsheet, Libby Asbestos. Date accessed: July 5, 2005. Online address: <http://www.epa.gov/region8/superfund/libby/lbybkgd.html>
- EPA. 2006. Guidance on Systematic Planning Using the Data quality Objectives Process, EPA QA/G4
- EPA. 2011. EPA Data Management Plan, Libby Asbestos Site. Version 2010.1. Prepared by EPA Region 8 and EPA Emergency Response and Removal DATA Team. March.

## **FIGURES**



LIBBY ASBESTOS SUPERFUND SITE

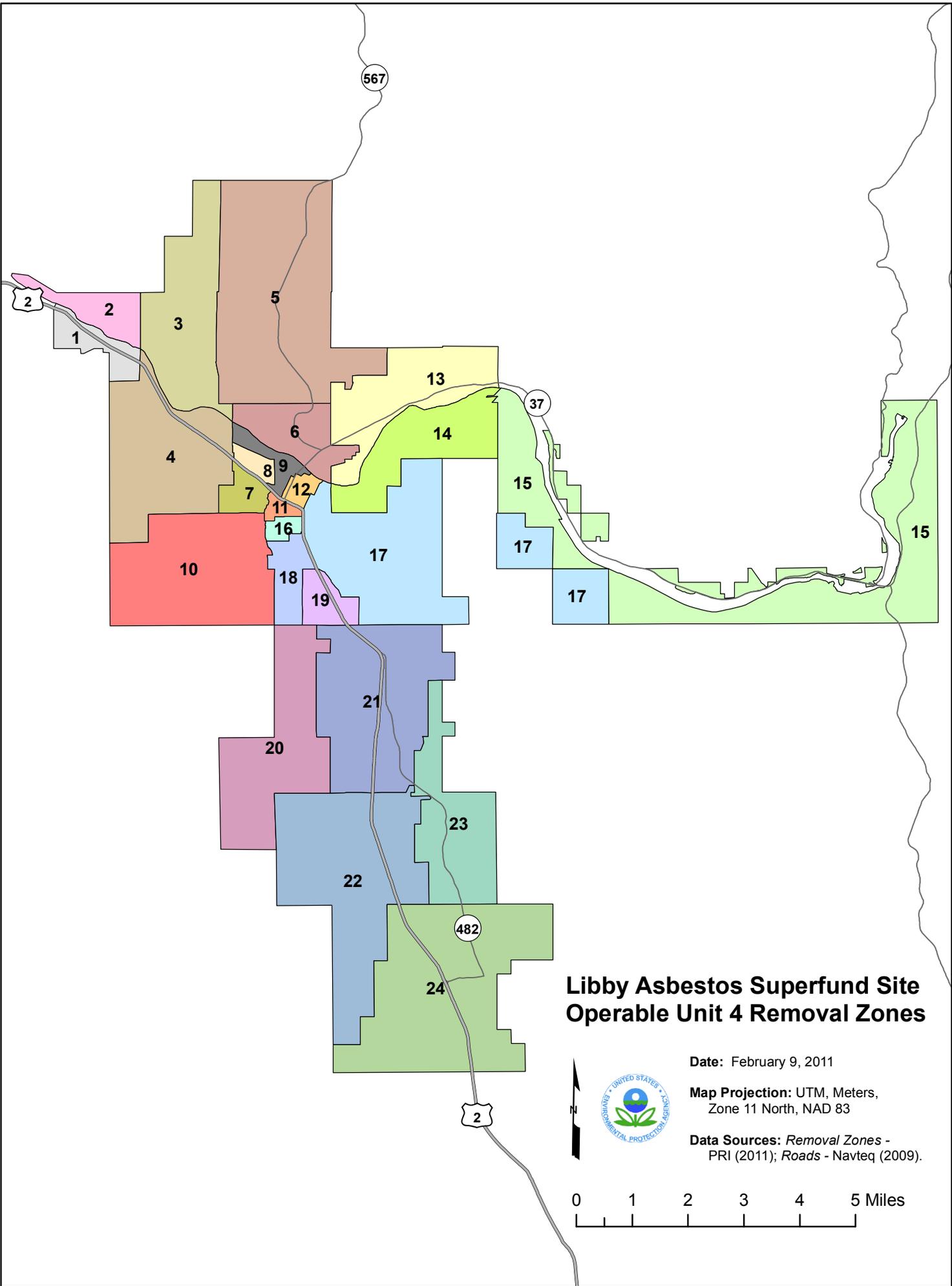
FIGURE 1

LIBBY ASBESTOS SUPERFUND SITE  
LOCATION OF OU4 AND OU7

**Legend**

- OPERABLE UNIT 7
- OPERABLE UNIT 4
- LINCOLN\_COUNTY\_BOUNDARY



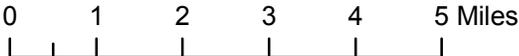


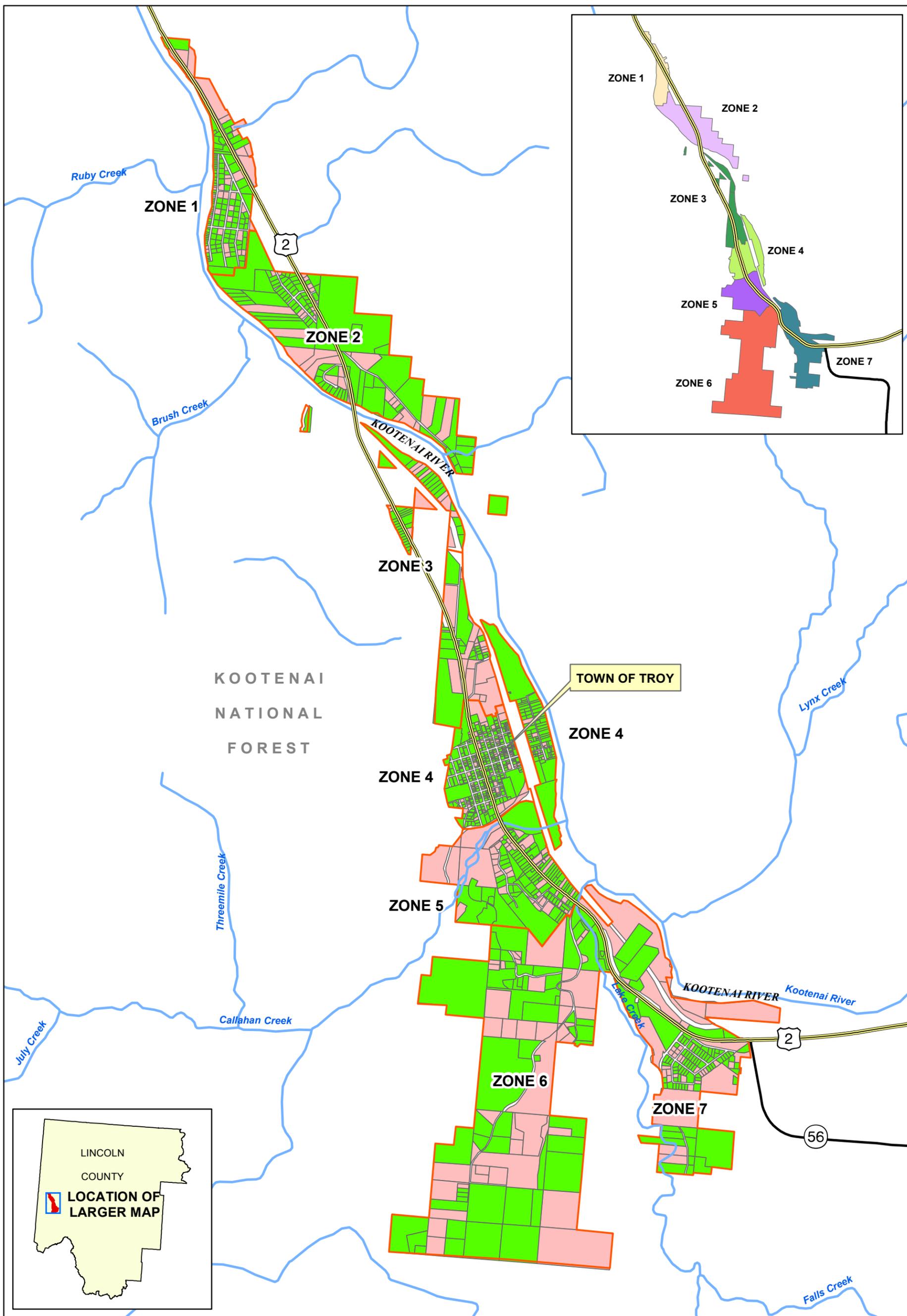
### Libby Asbestos Superfund Site Operable Unit 4 Removal Zones

Date: February 9, 2011

Map Projection: UTM, Meters,  
Zone 11 North, NAD 83

Data Sources: Removal Zones -  
PRI (2011); Roads - Navteq (2009).





Tt TETRA TECH EM, INC.

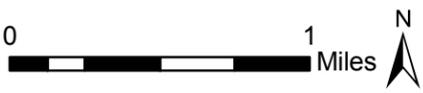
LIBBY ASBESTOS SUPERFUND SITE

FIGURE 3

OPERABLE UNIT 7  
ZONE MAP

**Legend**

- INSPECTION\_ZONES
- NOT INSPECTED AS OF DECEMBER 2010
- INSPECTED PRIOR TO DECEMBER 2010



**APPENDIX A**

**VOLUNTARY RECRUITMENT TEMPLATES**

**OPERABLE UNIT 4**

**Please note: The forms provided in this appendix are a basic template only to identify the information that will be compiled and reviewed with the property owner. The final format and data collection methods may be different and will adhere to the EPA's Reporting Requirements.**

# Libby Asbestos Superfund Site

OPERABLE UNIT 4

## PROPERTY INFORMATION SUMMARY

---

### PROPERTY INFORMATION

Geographic Unit Ids:

Property ID:

Physical Address:

Property Land Use

Business Name:

Property Description:

---

### CURRENT OWNER INFORMATION

Owner Name:

Owner Mailing Address:

Owner Primary Phone:

Owner Secondary Phone:

Owner Email:

---

### SUMMARY OF PREVIOUS PROPERTY ACTIVITIES

Date:

Details:

---

Verification Complete?	Y / N	Date:	Initials:
Entered into Database?	Y / N	Date:	Initials:
Entered into Records Center?	Y / N	Date:	Initials:

# Libby Asbestos Superfund Site

## OPERABLE UNIT 4

### Voluntary Recruitment Questionnaire

#### PROPERTY INFORMATION

Property ID:

#### RECRUITMENT HISTORY

Date/Time	Contact Type	Notes

1. Are any children under the age of 18 present on the property on:  
a monthly basis? Y / N  
a weekly basis? Y / N  
a daily basis? Y / N  
  
If yes how many and what are their ages as of today?
2. Does this property serve as a school or day care facility?
3. Are you aware of any vermiculite materials present in the attic, crawl spaces or any accessible interior areas in any building on the property? Y / N  
  
If yes, what and where?
4. Are you aware of any vermiculite materials present in any exterior portion of the property? Y / N  
  
If yes, what and where?
5. Is there a history of residents or visitors with asbestos related disease? Y / N  
*(Do not include any names or specific medical information as these forms may be public record)*
6. Signed access agreement? Y / N  
  
If no, is this a refusal or a deferral?
7. Comments:

---

Questionnaire Complete?	Y / N	Date:	Initials:
Entered into Database?	Y / N	Date:	Initials:
Entered into Records Center?	Y / N	Date:	Initials:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 81595 Wynkoop Street  
Denver, CO 80202-1129  
Phone 800-227-8917  
<http://www.epa.gov/region08>

**CONSENT FOR ACCESS TO PROPERTY**

Owner Name: \_\_\_\_\_ Phone Home: \_\_\_\_\_  
Location of Property: \_\_\_\_\_ Work: \_\_\_\_\_  
Mailing Address: \_\_\_\_\_ Cell: \_\_\_\_\_  
Relationship to Property (owner, tenant, etc.): \_\_\_\_\_

I, the undersigned, am the owner, their representative, or otherwise control the real property at the location described above. The Environmental Protection Agency has requested entry and access to my property pursuant to its response and enforcement responsibilities under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or Superfund) as amended, 42 U.S.C 9601 et seq.

I consent to officers, employees, authorized representatives, and authorized contractors of the EPA entering and having continued access to the above referenced property for the following purposes:

1. Conducting field inspections and investigations of the property and structures on the property in support of removal activity planning;
2. Taking samples of air, soil, dust and/or bulk samples on the property;
3. Performing construction set-up (i.e. fencing, containment, equipment) to support the removal of contaminated material;
4. Using minimal amounts of heat, water (city sources only), and electricity without reimbursement while conducting investigation, removal and/or restoration activities;
5. Taking response actions, including, but not limited to: site stabilization, marking or temporarily covering exposed vermiculite, removal of hazardous materials and substances;
6. Completing restoration efforts once contaminated material has been removed to include repair of possible damage or property loss as a proven direct result of removal and restoration activities; and
7. Other such actions as the EPA Remedial Project Manager determines may be necessary to protect human health and the environment.

If relocation is necessary, I realize that I may not have access to my property during removal activities for health and safety reasons. Only in the event of an emergency will I be able to request items from my property.

This written permission is given by me voluntarily with knowledge of my right to refuse and without threats or promises of any kind. I certify that this Consent for Access is entered into voluntarily and constitutes an unconditional consent and grant of permission for access to the property by officers, employees, representatives and authorized contractors of the EPA at reasonable times.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## **APPENDIX B**

### **VOLUNTARY RECRUITMENT TEMPLATES OPERABLE UNIT 7**

**Please note: The forms provided in this appendix are a basic template only to identify the information that will be compiled and reviewed with the property owner. The final format and data collection methods may be different and will adhere to the EPA's Reporting Requirements.**



**Voluntary Recruitment Questionnaire**

Libby Asbestos Site  
Operable Unit 7  
Created: February 2011

Primary CIC:

**RECRUITMENT HISTORY**

Date/Time	Contact Type	Notes

Date of confirmation:

Property Identification:

AD #:                      GeoUnit#:                      Legal Description:

Owner or Tenant Name (please circle one):

Business Name (if applicable):

Mailing Address:

Physical Address (E911 correct):

Phone numbers: home/work/cell

Type of Property: Residential/commercial/etc. – match the database entries for a TAPE

Please list all individuals who live (owner or tenant) or work here, or visit frequently (especially children): (for part time, please indicate number of days per year)

First Name	Last Name	Date of Birth (MM/DD/YYYY)	Circle One	Circle One
		/ /	Resident Employee	Part Time Full Time
		/ /	Resident Employee	Part Time Full Time
		/ /	Resident Employee	Part Time Full Time
		/ /	Resident Employee	Part Time Full Time
		/ /	Resident Employee	Part Time Full Time

Are you as property owner/business owner or tenant aware of any vermiculite materials present in the attic, crawl spaces or any accessible interior areas in any building on the property?      Yes      No  
If yes, what and where?

Is there a history of residents or visitors with asbestos related disease?      Yes      No  
(Do not include any names or specific medical information as these forms may be public record)

Signed access agreement?      Yes (staple to this form)      No      Reason given?  
If yes, when is inspection (GPI or TAPE) scheduled?

Appointment scheduled on master calendar?    Yes    confirmed

Any follow up questions or concerns from resident?

Follow up complete (date and actions)

---

Data entry

Date entered to Scribe:                      initials:

Date forms scanned:                          initials:

Date form filed:                                initials:

**OPERABLE UNIT 7**

**Montana Department of Environmental Quality  
Remediation Division/Federal Superfund Section**

**DEQ Troy Information Center  
303 N. Third St., PO Box 1170  
Troy MT 59935  
Local in Troy 406.295.9238**

**1100 North Last Chance Gulch  
PO Box 200901  
Helena MT 59620-0901  
406.841.5040 or 1.800.246.8198**

**CONSENT FOR ENTRY AND ACCESS TO PROPERTY  
DEQ Tracking Number AD-200XXX**

<b>Name:</b>		<b>Phone (home):</b>	
<b>Address:</b>		<b>(work):</b>	
		<b>(cell):</b>	

Address and/or legal description of property for which consent for entry and access is being granted:

Legal Property Description \_\_\_\_\_ Property Address (if available) \_\_\_\_\_

**Relationship to property:** \_\_\_\_\_  
(i.e., owner, owner's representative, tenant, etc.)

I, the undersigned, am the owner, their representative, or otherwise control the real property at the location described above. The State of Montana's Department of Environmental Quality (DEQ) and the United States Environmental Protection Agency (EPA) have requested entry and access to my property pursuant to its response and enforcement responsibilities under the Comprehensive Environmental Response, Compensation and Liability Act as amended (Superfund), 42 U.S.C. 9601 et seq.

I consent to officers, employees, and authorized representatives of the DEQ and EPA, including their authorized contractors, entering and having continued access to my property for the following purposes:

1. Visually inspecting and photographing the property, including the interior and exterior of any home or any other structures on the property;
2. The taking of such soil and/or dust samples as may be determined to be necessary;
3. The taking of actions to mark or temporarily cover exposed vermiculite.

Print Name: \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_