



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Ref: 8EPR-SR

June 5, 2014

Mr. Mike Noble, President
Libby Area Technical Assistance Group
P.O. Box 53
Libby, Montana 59923

Re: Libby Area Technical Assistance Group (LATAG) Comments, May 2, 2014, Review of EPA Findings, Tony Ward, Ph.D., Impact of Wildfires on Asbestos-Contaminated Areas Near Libby

Dear Mr. Noble:

Thank you for the Technical Advisory Group's review of the various fire-related studies that the EPA has conducted as part of the Operable Unit 3 Remedial Investigation. The purpose of these studies was to evaluate potential exposures to forest fire-fighters from inhalation of asbestos-contaminated smoke during firefighting activities. In addition, these studies also modeled potential exposures to Libby residents from inhalation of asbestos-contaminated smoke-filled ambient air as a result of large fires within OU3.

Many of the comments relate to the limited nature of these studies and the lack of actual data that is representative of actual wildfire exposures. EPA understands this concern and has made every effort to provide meaningful evaluations of fire-related exposures to the extent possible within the confines of what is currently allowed under Montana law. As you are aware, Montana Department of Environmental Quality (MDEQ) has taken the position that burning any material that contains known quantities of asbestos, including timber that may be contaminated, is prohibited. Therefore EPA has been unable to conduct activity based sampling (ABS) during test burns of significant size and scope to represent exposures during an actual wildfire.

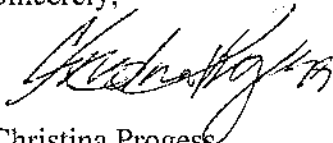
EPA consulted with USFS personnel to determine the appropriate exposure durations and frequencies of typical firefighting activities that would be expected to occur within OU3, which were used in our exposure calculations. Additionally, the USFS provided the PM2.5 data that EPA used in the evaluation of firefighter exposures as well as the fire parameters used in the model to predict exposures to Libby residents from inhalation of contaminated smoke.

EPA acknowledges and agrees that post-fire erosion or aerial deposition of contaminated ash, duff, and partially burned woody debris could spread contamination into nearby areas and

waterways. In the event that a fire occurs within the Superfund site boundary EPA will work with the USFS and DNRC to suggest post-fire best management practices (BMPs) to prevent further spread of contamination.

I appreciate the dialogue on these important fire-related issues and would be happy to have further discussions with the LATAG. Please contact me anytime at (303) 312-6009 or progress.christina@epa.gov.

Sincerely,



Christina Progress
EPA Superfund Project Manager

cc: Tony Ward, Technical Advisor
Steve Ackerlund, Technical Advisor
Tracy McNew, TAG Grant Administrator
Carolyn Rutland, MDEQ

