## **NPL Partial Site Deletion Narrative**

## Libby Asbestos Libby, Montana

On May 26 2020, the EPA partially deleted the Operable Unit 1 (OU1) Former Export Plant, of the Libby Asbestos Superfund site located in Lincoln County, Montana from the National Priorities List (NPL). This partial deletion pertains only to OU1. OU2 was deleted from the NPL on April 10, 2019. All other OUs (OU3, OU4/OU7, OU5, OU6 and OU8) will remain on the NPL.

The Libby Asbestos site is located approximately 35 miles east of Idaho and 65 miles south of Canada in the northwest corner of Montana. The site is the location of a former vermiculite ore mine that stopped operations in 1990. The vermiculite ore (containing a mixture of amphibole mineral fibers: Libby amphibole asbestos or LA), was mined using standard strip mining techniques and conventional mining equipment. OU1 is known as the Former Export Plant and is located north of Libby on the Kootenai River next to Highway 37. The OU1 site was owned by W.R. Grace and used for stockpiling, staging, and distributing vermiculite and vermiculite concentrate to processing areas and insulation distributors outside of the city of Libby. This OU has been further divided into subareas including the Former Export Plant (Area 1), the Riverfront Park (Area 2), and the embankments of Montana Highway 37 (Area 3). The Highway 37 right-of-way was included due to its proximity to OU1 and the presence of contamination. The OU1 total acreage is approximately 17 acres. The site was listed on the NPL on October 24, 2002, in response to extensive asbestos-related health problems in the Libby population. The asbestos contamination found in Libby Valley comes from one or some combination of source materials (e.g., vermiculite insulation, processed vermiculite ore, mine wastes). Asbestos from these source materials has been found in interior building dust samples and local soils, acting as secondary sources.

Remedial Investigations (RIs) began in 1999. From 2000 through 2008, various removal actions were conducted to excavate source areas in order to reduce exposure. In 2009, the Former Export Plant RI evaluated the potential human health and environmental impacts, and determined that OU1 had been partially cleaned up by prior removal actions and about nine acres needed further remediation. A Record of Decision (ROD) was issued by EPA on May 10, 2010 to break the exposure pathway to LA on the OU1 locations. Three remedial action objectives were identified to accomplish this goal: breaking the exposure pathway for inhalation of LA fibers, controlling erosion of contaminated soil to prevent exposures and spread of contamination, and implementing controls to prevent uses of the site that could pose unacceptable risks to human health. The major remedy components were: (1) Excavation and offsite disposal of top layers of soil in certain areas plus removal and replacement of riprap on the river; (2) Protective cover of clean soil; (3) Institutional Controls (ICs) such as utility location service and community awareness programs to prevent exposure and the spread of contamination; and (4) Operations and maintenance of the remedy. The selected remedy for OU1 includes ICs to restrict future uses of the site, and to limit the actions that could pose unacceptable risks or compromise the remedy. Remedial actions began in the summer of 2011 with excavation in areas where exposure pathways needed to be broken. Materials were excavated and disposed at the former vermiculite mine (OU3). Up to 36 inches of soil were removed, replaced with clean cover as backfill at depths of 6-25 inches depending upon location, and revegetated. A total of 25,656 cubic yards of contaminated soil were removed. Additional confirmation sampling was conducted in the summer of 2013. The OU1 post-construction risk assessment (December 2014) and the site-wide risk assessment (November 2015) both confirmed that the remedy at OU1 is protective of human health and the environment. The city of Libby placed an environmental covenant on its property in OU1 on June 19, 2019 that meets the IC objectives. All remedial components described in the 2010 OUI ROD have been implemented.

The EPA in consultation with the state, Lincoln County Commissioners, and the city of Libby, has determined that all appropriate response actions under CERCLA, other than maintenance of ICs and five-year reviews, have been completed for OU1 at the Libby Asbestos Superfund site. Therefore, the EPA is deleting OU1 of the Libby Asbestos Superfund site from the NPL. OU2 was deleted on April 10, 2019. All other OUs (OU3, OU4/OU7, OU5, OU6 and OU8) will remain on the NPL and will not be considered for deletion as part of this action.