

City-County Board of Health for Lincoln County

418 Mineral Ave
Libby, MT 59923



November 15, 2018

US Environmental Protection Agency- Region 8
1595 Wynkoop Street
Denver, CO 80202-1129
Attention: Andrew Schmidt, P.G.
Remedial Project Manager
Superfund Remediation Program

Re: Agencies Response to Comments, Controlled Groundwater Area (CGA) Petition,
October 16, 2018

Dear Mr. Schmidt:

Thank you for your October 16 letter presenting collective EPA, MDEQ and IP responses to our comments from July. Besides your response to our individual comments, you note that the Agencies would like for the City-County Board of Health for Lincoln County (BOH) to be the petitioner for the proposed CGA.

The BOH response to the question of serving as the petitioner has primarily been delayed by our concerns related to the Groundwater Resource (BOH Comment 14) that was part of our original comments about a year ago. We are currently awaiting guidance from the Port Authority and the City of Libby. Though you may elect to pursue other sponsorship of the CGA, we offer two suggestions related to our possible involvement.

First, it is probably now appropriate to accept your offer from several months ago to make a public presentation about the CGA. We would suggest scheduling for early March, hopefully allowing for potential progress on the Groundwater Resource topic. This would allow for a fuller airing of the information, and provide you the opportunity to respond to questions. (Our deferral to March is also based on the continued need to prioritize the BOH resources as we address O&M planning issues for the Asbestos Superfund Site.)

Second, we request that IP representatives participate in meaningful dialogue about the Groundwater Resource. We believe this request is not unreasonable, and reflects the spirit of cooperation that we expected from our discussions a year ago when we were approached about the CGA. The meaningful dialogue requested is likely the most expedient path to the BOH receiving guidance to proceed as the petitioner of the CGA.

We are all hopeful that these issues can be resolved. We appreciate your responsiveness and patience to comments and concerns over the past year. In general, aside from the above, they

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have largely been resolved. We understand if you decline our suggestions (requests) and move on to another direction. If however you (EPA, MDEQ and IP) are interested in continuing to work with us, then please advise as soon as possible in writing, as we are deferring any consideration of other comments in your October 16 letter.

Sincerely,

A handwritten signature in black ink that reads "George F. Jamison".

George F. Jamison
Vice Chair

cc via email: BOH, Lincoln County Commissioners, Port Authority Board, City of Libby