

# **Libby Community Advisory Group**

## **Meeting Summary**

### **October 11, 2007**

#### **Introductions**

The members of the Libby Community Advisory Group (CAG) and its facilitator, Gerald Mueller, introduced themselves. A list of the members and visitors in attendance is attached below as Appendix 1.

#### **Agenda**

The CAG agreed to the following agenda for this meeting:

- Budget Discussion
  - EPA FY 2008 Budget
  - Libby FY 2008 Burn Rate
  - Libby FY 2008 Investigations
  - Public Meeting
- CAG Outreach
- Responses to CAG Letters;
- South African Experience; and
- Public Comment.

#### **Budget Discussion**

##### **EPA FY 2008 Budget**

In response to a request at the September CAG meeting, Ted Linnert provided information on the President's budget for EPA for FY 2008 using three handouts. See Appendices 2 - 4. The first two, entitled "Trust Funds" and "Summary of Agency Resources by Appropriation," respectively, are excerpts from an EPA budget document available at <http://www.epa.gov/ocfo/budget/2008/2008bib.pdf>. The third is a newsletter article discussing the prospects for EPA's overall budget.

##### **Libby FY 2008 Burn Rate**

Also at the September CAG meeting, Paul Peronard was asked to provide information on two topics, the maximum amount of money that EPA could use for Libby cleanups and investigations next year, the so-called "burn rate," and an explanation of the possible FY 2008 investigation expenditures. Mr. Peronard stated that he decided not to estimate the maximum "burn rate" because it is not consistent with EPA's budget process, he is very unlikely to receive that amount for next year, and prioritizing expenditures for next year would still be required.

##### **Libby FY 2008 Investigation Budget**

Using the handout contained in Appendix 5, Mr. Peronard discussed funding for the investigation projects. The handout lists four values for each sampling, investigation and cleanup category: the FY07 budget request, the FY08 budget request, and the estimated lifetime expenditure beginning with the FY07 and for FY08 (including the FY07 funding). The total budget request for FY08 for investigations is \$9.25 million. The total Region 8 budget for all such projects is only \$10 million. Because Congress has not yet appropriated funding to EPA for FY08, EPA is currently operating under a continuing resolution at the FY07 level. For Libby

investigation projects, the FY08 budget amount was \$2 million. We do not know whether EPA Headquarters will supplement the difference between the \$9.25 and \$2 million levels. The FY08 cleanup budget will be \$17 million, the same as for the last 6 years. Given these constraints, EPA needs to decide what to fund first.

A summary of Mr. Peronard's discussion of the individual Exposure/Efficacy Sampling and Remedial Investigation/Feasibility Study investigation categories follows:

#### Exposure/Efficacy Sampling

Under sampling category in Appendix 5, the ABS acronym means activity based sampling. In ABS, an EPA contractor conducts typical indoor or outdoor or tradesman/fireman activity wearing a personal sampler. The indoor, outdoor and tradesman/fireman activities are the three asbestos exposure pathways. The indoor sampling will include passive and active activities. Examples of passive activities are eating dinner, watching television or reading. The active sampling will include house cleaning actions such as vacuuming. Tradesman sampling will include pulling carpets and remodeling. Indoor activities will be sampled during the summer, fall, and winter seasons. Examples of outdoor activities that will be monitored are lawn mowing, raking and child's play. The ABS sampling will define exposure data which, when married to the risk model, will produce the risk assessment.

The ABS will test three important EPA cleanup decisions, leaving vermiculite in building walls and in inaccessible crawl spaces and not to replace carpeting.

*Audience Member Question - Have you already started the indoor sampling?*

Answer - Yes. Each property cleaned has had clearance sampling to test the cleanup efficacy. Also, this past summer we conducted ABS indoor sampling of 80 properties and 75 outdoor sampling of 75 properties.

*Audience Member Question - Does your sampling include some properties already cleaned and some that were not contaminated and therefore not cleaned?*

Answer - Yes, we are doing both. It is important to check on properties that have not been cleaned. My worst nightmare is finding exposure on properties identified through the screening properties as not needing a cleanup. We also want to verify that cleanups worked.

*Audience Member Question - How are you conducting the ABS?*

Answer - For residential properties we begin by moving residents out of their home. Then an EPA contractor who wears a personal sampler in the breathing zone of either an adult or a child follows a script carrying out actions that are meant to be representative of active and passive indoor and outdoor activities. Contractors also conduct representative actions for tradesmen and firemen.

*Audience Member Question - Will you be sampling the activities of carpenters?*

Answer - Yes, in 2008.

#### Remedial Investigation/Feasibility Study (RI/FS) Investigations

RI/FS investigations are designed to determine the nature and extent of asbestos contamination of each of the operable units (OUs):

- Mine - Sampling will be conducted to determine how far the contamination traveled in the air,

soil, and water. The University of Montana research has found asbestos in tree bark around the mine. The mine investigation will determine the extent and direction of the bark contamination. Rainy Creek will be sampled to the river. During FY08, W.R. Grace will pay for the mine work, leaving EPA to pay only for oversight. This is why the lifetime mine expenditure drops in FY08 from FY07 in Appendix 5.

- Troy - In this year half of the Troy properties were screened to identify contaminated properties.
- Processing areas
  - Export plant site, OU1 - We hope to close out the investigation work at the export plant site this year by compiling the data and writing the report.
  - Stimson Mill - Except for the buildings, we have not found widespread vermiculite at the Stimson lumber mill. The vermiculite has been removed from the mill buildings, and we will conduct two rounds of activity sampling when the buildings are occupied and when they are not.
  - Screening plant - This site has been cleaned from stem to stern on the Highway 37 side of the river. Across the river on the bluffs, we still need to define the area of contamination. Our task has been complicated by the construction of a new home on contaminated ground.
  - BN railroad - BN funded a cleanup of the rail yards. The contamination along the rail line remains to be characterized.
- Libby residential and business district, OU4 - Some properties have not been screened because EPA was denied access. Access has been granted to some of them. Sampling of the creeks remains to be completed. We will repeat sampling at the elementary, middle, and high schools this year.
- Baseline risk assessment (BRA) - These investigations support the contract work on the toxicological and epidemiologic evaluations. For FY07, they were funded separately.

*CAG Member Question - Does one of the cleanup categories include the funding for the Environmental Resource Specialist (ERS) position?*

Answer by Paul Peronard - Yes, the amount listed for the category "Libby Homes/Businesses" includes funds for the property cleanups and the ERS position and activities. I hope this coming year to test moving the ERS function to local government because ultimately, after EPA leaves Libby, local government will probably be responsible for carrying out the ERS function.

### **Public Meeting**

At its September 13, 2007 meeting, the CAG decided to hold a public meeting, separate from a CAG meeting, on November 8, 2007 to solicit advice from the community regarding priorities for EPA's FY08 budget for Libby. The CAG revisited this decision. Some members initially questioned the value of such a meeting, arguing that it may be divisive, that members of the community may not have enough information and understanding to contribute meaningful advice about budget priorities, the CAG does not adequately represent the community, and EPA should merely set the budget. Paul Peronard also stated that he would be unable to attend a meeting in November, and that obtaining advice by February 2008 would not be too late to be effective.

*After a discussion involving both CAG members and the audience, the CAG agreed on the following:*

- *Providing information to the community about the ongoing sampling, investigations, and cleanup needs would be beneficial;*
- *A public meeting should be held on January 10, 2008 at 7:00 p.m. at the school system's*

### ***Little Theater to discuss the budget and alternative funding choices;***

- ***Prior to the meeting, EPA should prepare a short summary of the FY08 budget items and choices and publicize the summary through local print and other media;***
- ***EPA should also prepare a form that people attending the January meeting could use to indicate their preferences among the budget choices;***
- ***During the meeting, the public should also be afforded the opportunity to comment on the budget choices;***
- ***During the meeting, those in attendance would not be asked to vote on the budget choices; and***
- ***At its February meeting the CAG should consider the public's written and oral comments and seek to provide advice to EPA about the budget choices.***

### **CAG Outreach**

Bill Patten reported that he has made available disks of a power point presentation that explains the purpose, activities, and accomplishments of the CAG and solicits additional community participation in it. CAG members have or are planning to make presentations to the following community groups: Gen X, clergy, Libby and Troy City Councils, Rotarians, and the United States Forest Service. The power point will have to be revised with the new January 10, 2008 date of the budget public meeting.

### **CAG Letters**

Bill Patten reported that Joan Miles, Director of the Montana Department of Health and Human Services, has agreed to come to Libby but could not do so for this meeting. She hopes to come in either November or December. Mr. Patten has not yet had a reply to his letter to Senator Baucus. DC Orr reported that the letter to EPA Secretary Johnson has not yet been mailed, but it soon will be.

*Comment by Paul Peronard - Bullet points are being prepared for Secretary Johnson to visit with Secretary Leavitt of the US Department of Health and Human Services to seek an alternative to the declaration that would address Libby's health care needs.*

### **Agency Reports**

Except for a brief state report by Catherine LeCours, agency reports were not given because of the lateness of the hour. Ms. LeCours stated that Paul Lammers had prepared a draft operation and maintenance plan for the export plant site.

### **South African Experience**

Robert Jones with Sustainable Development Consulting International, LLC, reported on his study of three years of research into asbestos contamination sources in South Africa using a power point presentation.

### **Public Comment**

There was no additional public comment.

### **Next Meeting Agenda Topics**

- Review of EPA prepared materials for the January 10, 2008 community meeting on FY08 budget alternatives;
- Report on the CAG member outreach efforts, including which groups have been addressed;

- If MDPHHS Director Miles is able to come, the current situation regarding asbestos disease-related funding will be discussed;
- The draft operation and maintenance plan for the export plant site will be presented;
- And, if time remains, agency reports.

### **Next Meeting**

The next meeting is scheduled for 7:00 to 9:00 p.m. on November 8<sup>th</sup>, 2007 in the Ponderosa Room of Libby City Hall. The CAG will not meet in December.

**Appendix 1**  
**CAG Member & Guest Attendance List**  
**October 11, 2007**

**Members**

David F. Latham

K.W. Maki

DC Orr

Phillip Erquiaga

Catherine LeCours

Rita Windom

Ted Linnert

Paul Peronard

Mike Giesey

Eileen Carney

Bill Patten

**Group/Organization Represented**

*The Montanian*

Libby Schools

Libby Resident

Libby Resident

Montana Department of Environmental Quality

Lincoln County Commission

EPA

EPA

Center for Asbestos Related Disease (CARD)

Montana State Board of Respiratory Care

St. John's Lutheran Hospital

**Visitors**

Robert Jones

Sustainable Development Consulting International, LLC

## **Trust Funds**

*(Dollars in Millions)*

	FY 2007 President's Budget <sup>1</sup>		FY 2008 President's Budget <sup>1</sup>	
	\$	FTE	\$	FTE
Superfund <sup>2</sup>	\$1,218	3,097	\$1,211	3,057
Inspector General (Transfers)	\$13	94	\$7	44
Research & Development (Transfers)	\$28	106	\$26	105
<b>Superfund Total</b>	<b>\$1,259</b>	<b>3,297</b>	<b>\$1,245</b>	<b>3,206</b>
<b>Base Realignment and Closure<sup>3</sup></b>	<b>\$0</b>	<b>78</b>	<b>\$0</b>	<b>78</b>
<b>LUST</b>	<b>\$73</b>	<b>77</b>	<b>\$72</b>	<b>75</b>
<b>Trust Funds Total:</b>	<b>\$1,332</b>	<b>3,452</b>	<b>\$1,317</b>	<b>3,359</b>

<sup>1</sup> Totals may not add due to rounding.

<sup>2</sup> Includes about \$26 million for the Department of Justice in FY 2007 and approximately \$25 million in FY 2008.

<sup>2</sup> Includes Department of Justice Funding (about \$26 million in FY 2007 & about \$25 million in FY 2008)

<sup>3</sup> Funding for reimbursable FTE provided by the Department of Defense via an Interagency Agreement.

### **Superfund**

In FY 2008, the President's Budget requests a total of \$1,245 million in discretionary budget authority and 3,206 work years for Superfund. Currently, more than 95 percent of the 1,557 sites on the Superfund National Priorities List (NPL) are either undergoing cleanup construction, are completed, or are deleted.

Of the total funding requested for Superfund, \$617 million and 1,080 work years are for Superfund cleanups, including Federal facilities. The Agency's Superfund cleanup program addresses public health and environmental threats from uncontrolled releases of hazardous substances. The Agency expects to demonstrate significant progress in reducing risk to human health and the environment. To address the challenges of meeting construction and post-construction responsibilities, EPA proposes to redirect a total of \$4 million for Regional construction cleanup work at NPL sites. In FY 2008, EPA and its partners anticipate completing 30 Superfund cleanups at NPL sites to achieve the overall goal of 1,060 total construction completions by the end of FY 2008.

Of the total funding requested, \$179 million and 1,060 work years are for Superfund enforcement related activities. One of the Superfund program's primary goals is to have responsible parties pay for and conduct cleanups at abandoned or uncontrolled hazardous waste sites. The program focuses on maximizing all aspects of Potentially Responsible Party (PRP) participation; including reaching a settlement with or taking an enforcement

action by the time of a Remedial Action start at 90 percent of non-Federal Facility Superfund sites. EPA emphasizes fairness in the settlement process.

The Agency has also been encouraging the establishment and use of Special Accounts. These accounts provide EPA with the ability to more efficiently clean up sites using funds provided by responsible parties. These funds can be provided to PRPs as an incentive to perform clean up work they might not be willing to perform, or used by the Agency to fund clean up. The result is the Agency can clean up more sites, and allows the Agency to preserve appropriated Trust Fund dollars for other sites where there are no viable PRPs. Where PRP negotiations and previous enforcement actions fail, EPA uses its appropriation to clean up sites and then seeks to recover these costs from the PRPs.

The FY 2008 President's Budget also includes resources supporting Agencywide resource management and control functions. This includes essential infrastructure, contract administration, financial accounting, other fiscal operations and funds for Federal agency partners. The Agency works with several Federal agencies to perform essential services in areas where the Agency does not possess the specialized expertise. In most years, contributors include the United States Coast Guard, the National Oceanic and Atmospheric Administration, the Department of the Interior, the Federal Emergency Management Agency, and the Occupational Safety and Health Administration.

In addition, the Agency provides funds for Superfund program research and auditing. The President's Budget requests \$26 million and 105 work years to be transferred to Research and Development for innovative cleanup technology testing. The Superfund research program is driven by program office needs to reduce the cost of cleaning up Superfund sites, improve the efficiency of characterizing and remediating sites, and reduce the scientific uncertainties for improved decision-making at Superfund sites. The President's Budget also requests \$7 million and 44 work years to be transferred to the Inspector General for program auditing.

#### ***Base Realignment and Closure Act***

The FY 2008 President's Budget requests 78 reimbursable work years to conduct the Base Realignment and Closure Act (BRAC) program. Since 1993, EPA has worked with the Department of Defense (DoD) and the states' environmental programs to make property environmentally acceptable for transfer, while protecting human health and the environment at realigning or closing military installations.

**Summary of Agency Resources by Appropriation**

(Dollars in Thousands)

<b>Appropriation Account</b>	<b>FY 2007 PresBud</b>	<b>FY 2008 PresBud</b>
Science & Technology (S&T) <sup>1</sup>	\$788,274	\$754,506
Environmental Programs and Management (EPM)	\$2,306,617	\$2,298,188
Rescission of Prior Year's EPM Funds		
Office of Inspector General <sup>1</sup>	\$35,100	\$38,008
Buildings & Facilities	\$39,816	\$34,801
Oil Spill Response	\$16,506	\$17,280
Superfund (SF)	\$1,258,955	\$1,244,706
- <i>Superfund Program</i>	\$1,217,828	\$1,211,431
- <i>Inspector General Transfer</i>	\$13,316	\$7,149
- <i>Science &amp; Technology Transfer</i>	\$27,811	\$26,126
Rescission of Prior Year's SF Funds		
Leaking Underground Storage Tanks	\$72,759	\$72,461
State & Tribal Assistance Grants (STAG)	\$2,797,448	\$2,744,450
Rescission of Prior Year's STAG Funds	\$0	-\$5,000
<b>Agency Total:</b>	<b>\$7,315,475</b>	<b>\$7,199,400</b>

<sup>1</sup> Does not include Superfund transfers--see the Superfund line items below for annual amounts.

## Appendix 4

Tuesday, September 18, 2007

### **InsideEPA: FY08 Budget Clash Could Force Cuts To Democrats' Priorities For EPA**

The showdown between President Bush and congressional Democrats over federal spending limits in fiscal year 2008 could force lawmakers to scale back proposed funding increases for key Democratic policy priorities, including huge increases for EPA's clean water state revolving loan fund (SRF) and new funding for an EPA-led climate change commission, Capitol Hill sources say.

The showdown stems from Democrats' efforts to increase overall discretionary spending by an estimated \$22 billion over the administration's requested levels. EPA's share of that increase amounted to about \$900 million. President Bush calls the increase "excessive" and is vowing to veto the appropriations bills.

Several Democratic and Republican Hill sources say that there is now great uncertainty about how Congress will address appropriations legislation for FY08, particularly since the start of the new fiscal year is less than three weeks away.

The House version of EPA's spending bill, H.R. 2643, would fund the agency at \$8 billion, which is \$361 million above FY07 enacted levels and \$887 million above the president's request. The House by a 272-155 vote passed EPA's funding bill June 27. The Senate version, S. 1696, would fund the agency at \$7.77 billion, a \$574 million increase over Bush's request. While the Senate bill passed the appropriations committee, it is yet to get time for Senate floor consideration.

With the fate of EPA's spending bill uncertain, congressional sources say there are a number of different ways events could proceed -- but almost all of them would result in reduced funding for core EPA programs and would likely see certain policy-specific provisions dropped from the final bill.

One option is that House Appropriations Committee Chairman Dave Obey (D-WI) and Senate Appropriations Committee Chairman Robert Byrd (D-WV), as well as other senior Democratic leaders, may try to seek a deal with Bush over an acceptable total funding level.

A Republican source says this approach may be viable if lawmakers and Bush can reach a "global deal" that could provide, for example, \$10 billion more in discretionary spending.

Under this approach, lawmakers would then have to send revised, and possibly much smaller, funding allocations to the various appropriations panels to work out new proposed FY08 funding levels. The appeal of this approach is that if a deal can be reached with the president -- which several observers believe would be highly unlikely at the moment -- the spending bills would all get a modest increase over Bush's budget request and also help the bills avoid a presidential veto.

If this were to happen, the House and Senate appropriations panels responsible for EPA's budget would then have to revise their FY08 proposals drastically.

In this situation, the clean water SRF would be a prime candidate for lawmakers to reduce the fund's proposed increase and even potentially assign it a small increase compared to FY07, sources say. The House proposed a \$437 million increase for EPA's Clean Water state revolving loan fund above the president's request, bringing funding to \$1.1 billion. S. 1696 would provide \$887 million for the fund. A White House statement of administration policy says that administration opposes the House increase, which is 63 percent above the president's requested level.

One Democratic source says that if lawmakers ultimately have to find ways to lower EPA's overall FY08 funding level, eliminating the House's proposed \$437 million increase for the clean water SRF is one way to go about it.

However, the source acknowledges this move “would not be popular” with states.

A second Republican source adds that lawmakers in this situation would also look elsewhere in the funding bill for ways to meet a lower compromise funding level, ranging from eliminating funding for new policy items to reducing funds for core EPA programs. The source says one item that “could go right away” is the provision in H.R. 2643 that provides \$50 million to establish a new Commission on Climate Change Adaptation & Mitigation to review scientific questions that need to be addressed to address global warming.

Alternatively, Congress may try to pass EPA’s spending bill alongside several other agencies’ funding bills in an omnibus measure if agreement cannot be reached with the president to avoid a veto. This would send several funding bills to Bush at once as “must pass” legislation that lawmakers would hope the president could not veto because it would cover several key agencies.

If this is the approach Congress takes, a second Democratic source says EPA’s spending bill could find itself attached to appropriations legislation that has already passed both the House and Senate and is awaiting conference, such as the FY08 military construction, the Department of Veterans Affairs, and related agencies appropriations bill. The Senate recently appointed conferees for that bill.

Under congressional rules, because EPA’s spending bill has passed the appropriations committee it could be attached to the military construction appropriations conference without receiving any Senate floor consideration. The Democratic source describes this as a “highly irregular” procedure but says it may happen if it appears that a veto of individual spending bills is inevitable, or if time runs out this year for floor consideration and conferences on all of the remaining appropriations bills.

In this situation, only senior lawmakers on the House and Senate appropriations panels responsible for EPA’s budget would be invited to the conference negotiations, the source adds.

Under this approach, the most contentious policy items that would normally be resolved in a dedicated House-Senate conference on EPA’s spending bill could easily be dropped. For example, lawmakers could quickly drop an amendment to the House version of EPA’s funding bill that Rep. Eddie Bernice Johnson (D-TX) successfully included during full floor debate which would prevent EPA from finalizing a controversial proposal to allow facilities to downgrade from “major” to “area” sources of hazardous air pollutants, which are subject to less stringent pollution reduction requirements.

Despite the irregularity of this approach, the second GOP source believes the omnibus or minibus bill approach is “the most likely” of all the options open to lawmakers looking to pass all the spending bills this year.

Another option for Congress is to try and pass the appropriations bills individually, and both GOP and Democratic sources in the House and Senate say this is what they are seeking. However, the Iraq war debate and other issues may limit the amount of progress that can be made on the spending bills.

Should lawmakers try to push through the spending bills individually they will have to battle with President Bush’s veto threat. The president has issued several warnings that he will veto a wide range of pending appropriations bills due to their high spending levels, meaning if Congress does pass the bills individually they would likely be vetoed, leading to a standoff between Congress and the White House.

Other Democratic and Republican sources stress that lawmakers are intent on passing the appropriations bills individually. The sources adds that by mid-October -- following the current Iraq war debate -- Congress will have a better idea of what will be the most viable option for passing the spending legislation.

In the meantime, sources say that a continuing resolution will be necessary as a short-term measure. The current fiscal year ends Sept. 30, and the resolution will likely fund agencies at FY07 levels through late October or early November. The first Democratic source describes this move as “standard” in recent years, and is hopeful that FY08 appropriations bills will all have become law by the end of the year. -- *Anthony Lacey*

## Appendix 5

### Libby FY-08 Budget Estimates

Item	FY-07 Request	FY-08 Request	FY-07 Lifetime Estimate	FY-08 Lifetime Cost (Including FY-07)
<b>Exposure/Efficacy Sampling</b>				
Ambient Air Sampling <sup>1</sup>	\$600,000.00	\$700,000.00	\$1,200,000.00	\$1,300,000.00
Indoor ABS	\$2,000,000.00	\$1,500,000.00	\$3,500,000.00	\$3,500,000.00
Outdoor ABS	\$2,000,000.00	\$1,500,000.00	\$3,000,000.00	\$3,500,000.00
Worker/Fireman ABS	\$0.00	\$1,000,000.00	\$0.00	\$1,000,000.00
<b>RI/FS Investigations</b>				
Mine <sup>2</sup>	\$610,000.00	\$1,000,000.00	\$7,500,000.00	\$2,500,000.00
Troy	\$1,000,000.00	\$2,000,000.00	\$3,000,000.00	\$3,500,000.00
Processing Areas	\$500,000.00	\$500,000.00	\$1,000,000.00	\$1,200,000.00
Libby OU <sup>3</sup>	\$250,000.00	\$550,000.00	\$750,000.00	\$1,000,000.00
BRA Support <sup>4</sup>	\$0.00	\$500,000.00	\$0.00	\$1,200,000.00
<b>Pipeline Total</b>	<b>\$6,960,000.00</b>	<b>\$9,250,000.00</b>	<b>\$19,950,000.00</b>	<b>\$18,700,000.00</b>
<b>Clean up</b>				
Libby Homes/Business <sup>5</sup>	\$17,000,000.00	\$17,000,000.00	\$70,500,000.00	\$70,500,000.00
Troy <sup>6</sup>	NA	\$8,000,000.00	\$31,500,000.00	\$31,500,000.00
Creeks <sup>7</sup>	NA	\$2,000,000.00	NA	\$2,000,000.00
CVCC <sup>7</sup>	NA	\$2,000,000.00	NA	\$2,000,000.00
<b>Clean up Total</b>	<b>\$17,000,000.00</b>	<b>\$29,000,000.00</b>	<b>\$102,000,000.00</b>	<b>\$106,000,000.00</b>

Notes:

1. Includes expansion to processing areas, highway 37 corridor, and rail corridor
2. Assumes Grace will do bulk of sampling, EPA will develop sampling plans and BRA
3. Includes assessment of Creeks and CVCC, as well as properties which have yet to be screened
4. Technical input for Site wide analytical, toxicological, statistical, and sampling strategy support
5. This estimate includes the total number of properties that meet the current removal triggers (1440) less the properties cleaned up prior to properties that have LA contamination, but do not exceed the current removal triggers.
6. Assumes 300 total properties to be cleaned in Troy, plus infrastructure set-up.
7. We are in the initial stages of preparing designs for these projects, the estimates are very rough.