

City-County Board of Health for Lincoln County

418 Mineral Ave
Libby, MT 59923



February 28, 2018

Douglas Benevento, Administrator
U.S. EPA, Region 8
80C-EISC
1595 Wynkoop Street
Denver, CO 80202-1129

Re: Health Care Concerns, Public Health Emergency Designation
Libby Asbestos Superfund Site, Lincoln County, Montana

Dear Mr. Benevento:

The recent undated letter (copy attached) voiced concern that consideration of changes to the Public Health Emergency (PHE) designation not be made without community input and thorough vetting of the issue. The focus in the earlier letter was potential impacts on funding during Operation and Maintenance activities. However, there are additional concerns of equal or greater health care impacts.

The 2009 PHE designation specifically underscored the need for asbestos related health care, and initiated providing crucial medical care. The PHE designation was (and remains) an essential element allowing the "Libby provisions" to be included in the Affordable Care Act. Thousands of persons affected by exposure to Libby Amphibole asbestos have received screening, treatment and other services, and new cases continue at a steady rate. These services, which would otherwise not be available, were instituted as a part of a "long term solution". The importance of continuing these programs cannot be overstated. A 2017 community health needs assessment identified asbestos related disease as the #1 community health concern.

We would appreciate knowing whether, or to what extent, considerations of altering or rescinding the PHE are occurring. The City-County Board of Health for Lincoln County and the Lincoln County Health Officer formally request to be a party to any such dialogue concerning the medical and environmental health of Lincoln County.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Black, MD".

Brad Black, MD
County Health Officer
Lincoln County, Montana

A handwritten signature in black ink, appearing to read "Jan Ivers".

Jan Ivers, Chair
City-County Board of Health
Lincoln County, Montana

cc/encl: Lincoln County Commissioners
Mayor, City of Libby
Mayor, City of Troy
Montana, Department of Environmental Quality (Attn: Tom Livers)

Lincoln City-County Board of Health

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Re: Public Health Emergency Designation
Libby Asbestos Superfund Site
Lincoln County, Montana

Dear Mr. Benevento:

As efforts progress to move the site into the post-construction phase, we are concerned that continuation or termination of the Public Health Emergency designation not be made without community input and thorough vetting of the issue.

In particular, we are concerned that rescinding the designation not jeopardize the availability to conduct future Operation and Maintenance activities, including funding, and other activities related to the long term protection of the remedy and public health. We also recognize there may be benefits to dropping the designation, under appropriate circumstances.

We would appreciate being part of a thorough examination of this topic.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jan Ivers', with a long, sweeping underline.

Jan Ivers, Chair
City-County Board of Health
Lincoln County, Montana

cc:
Lincoln County Commissioners
Mayor, City of Libby
Mayor, City of Troy
Montana, Department of Environmental Quality (Attn: Tom Livers)