



## Memo

To: Ralph Adam, USFS  
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Date: September 23, 2011

Project: 32106F001  
cc: Kurt Muenchow, USFS  
Grant Ohland, AMEC

**Subject: Summary of September 22, 2011 Meeting with USFS and South Dakota DENR Nemo Work Center Project**

A meeting was held on September 22, 2011 at the South Dakota (SD) Department of Environment and Natural Resources (DENR) office in Pierre, SD. The purpose of the meeting was to allow the USDA Forest Service (USFS) to meet with DENR to discuss ongoing activities at the Nemo Work Center Site (Nemo) and obtain past correspondence from DENR for the project file being compiled by AMEC. USFS was able to provide an update on the new USFS staff and clarification on the path forward since their last meeting approximately 18 months ago. The following people were in attendance:

- Ralph Adam (USFS), the Remedial Project Manager (RPM) for Nemo;
- Brian Walsh (DENR), hydrologist in the Groundwater Quality Program and state contact for the Nemo site;
- Mark Lawrensen (DENR), senior scientist in the Groundwater Quality Program and program manager of the Superfund and Federal Facilities Program; and
- Abby Bazin (AMEC), regulatory and technical support to the USFS.

Brian and Mark are very familiar with this site and have worked on it for a number of years. They know many of the historical key players in the USFS. Mark also noted that because the Gilt Edge Mine Superfund Site is in Lawrence County, County officials would have some familiarity with CERCLA.

Approximately 18 months ago the USFS met with DENR to discuss the Nemo site. From that meeting, DENR was under the impression that USFS was "starting over" at the site. The USFS and DENR have not been in regular contact regarding the site since that time. Ralph and Abby clarified that the USFS was not "starting over" but was moving from the removal actions pathway in CERCLA into the remedial actions pathway, with the goal of completing an RI/FS and executing a Record of Decision. Data previously collected at the site was still valid and would be used for decision making but additional data may be collected to fill data gaps as part of a Remedial Investigation (RI). Mark and Brian viewed the RI as primarily a paper exercise and were amenable to this approach. They were not of the opinion that there would be many data gaps and preferred this approach in lieu of "starting over" at the site. Ralph also indicated that a Draft RI had been produced and that EPA and DENR would be allowed to review it once



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an internal review is complete. When asked if DENR would receive the RI by late October, Abby stated that was likely too optimistic and that the RI may be a few months out.

Brian and Mark expressed concerns about the lack of communication from the USFS since the last meeting 18 months ago. DENR used to regularly receive operations and monitoring reports as recently as 2008, but have not recently been updated on the plume boundary or status of the pump and treat system. They stated that they did not intend to comment on the reports, but wanted to be able to speak intelligently about the site if other state offices or citizens had questions. Ralph explained that there had been significant changes in the USFS since that meeting and that communications had trailed off as many people took on new roles. Ralph agreed to send operations and monitoring reports and to send a list of contacts for the USFS. Correspondence will be addressed to Mark or to both Mark and Brian.

Mark and Brian also noted that the goals of the cleanup had changed over time as new personnel and consultants took over or as new problems emerged. Ralph and Abby noted that one purpose of the shift to a remedial action pathway was to unify the USFS in their goals at all levels (local, regional, national) and that a Strategic Plan had been developed to identify a clear path forward.

Finally, Brian provided a disc containing the DENR files related to the Nemo Guest Ranch underground storage tank (UST). Mark pointed out these files were related to the state removal of USTs and not to the EDB investigation. Brian and Mark said that any documents related to the EDB investigation would have been generated by the USFS or would consist of comments on a USFS document. Abby had a chance to look through the DENR files regarding the EDB investigation (less than one file cabinet drawer in size) and confirmed this was generally true. Abby was allowed to copy emails and letters that were not available in the Nemo project file.