Notes from Lac du Flambeau (LDF) / EPA Check in Call on October 31, 2016

Attendees:
Dee Allen, LDF
Kristin Hanson, LDF
Sherry Kamke, EPA
Bob Egan, EPA
Jennifer Manville, EPA

- LDF indicated that they believed that the project timeline focused on state activities and that it should be updated to include tribal and EPA activities past, present and future.
- LDF indicated that they expected a formal site investigation plan to be developed and that this would articulate how a conceptual site model will be arrived at.
- LDF stated that they expected the site investigation plan be fully executed before any corrective action other than interim measures were to take place.
- EPA indicated the belief that site investigation activities could occur as interim remediation was going on.
- LDF stated that they believed that remedial alternatives were being explored as if a decision was made already.
- EPA indicated that we saw the Bristol report as something that was evaluating source area interim remediation measures and that those measures may or may not be a component of the final remediation measure(s) at the site.
- LDF indicated that soil excavation was one type of interim measure that fits the definition of interim but most other measures would be considered full blown remediation steps that would require complete site investigation of the site before they were selected for implementation.
- EPA stated that an interim action could be anything, soil excavation or any other remedial measure but any step taken would not necessarily be the final remedial step. Any logical step, even one conducted while conducting site investigation activities, would be considered an interim measure.
- EPA stated that we heard that LDF had a strong preference now to complete a site assessment/investigation phase before doing any work in the source area. EPA noted that previously we heard LDF indicating a strong desire to do work in the source area as quickly as possible.
- LDF indicated that they want to be sure that the remedial options evaluated include an evaluation of how each option addresses NAPL, lead scavengers and lead and other contaminants of concern. LDF stated that there is a need to evaluate remedial options and you can't do that until after the site is fully categorized.
- LDF expressed a desire to have a plan to fully investigate the site in order to go forward.
- LDF also expressed a desire to have a conceptual site model update that incorporated all the relevant data and then using that to update the scope of work. Everyone should agree on the conceptual site model.
- LDF stated that data gaps need to be identified and then we need to close those gaps.
- LDF expressed concern that air sparge soil vapor extraction systems may not address all environmental contaminants of concern- it may take care of BETX compounds only.

- LDF said the modeling shows that the soil contamination extends below the road but the text in the Bristol report doesn't support that. The Bristol report is missing components and accurate data.
- EPA indicated that Bristol was in the process of updating the model to include more data and then would tweak the information about the options.
- LDF indicated that they believed that finishing the evaluation of the media below the site such as the groundwater plume was more of a priority than the lake bed.
- EPA explained that completing the site investigation was an iterative process and that it can't be done all at one time. The process whether led by responsible parties or by EPA is an iterative process, done in phases. EPA also gets funding to support this work for EPA lead sites on an annual basis so we plan for annual activities for sites.
- LDF stated that they believed not having a plan has a consequence. LDF stated that a timeline of the project process should include a site assessment/site investigation completion stage.
- LDF pushed for an order of operations that was planned together and agreed upon by everyone.
- LDF stated that the site investigation should be completed by EPA or the tribe, not by the state.
- LDF stated that all available data collected to date should be evaluated.
- LDF asked if EPA maintains a site file. They expressed the desire that EPA would maintain all data within the reservation with a complete site all in one location for each site in the reservation.
- LDF pointed out the existence of a conceptual site model checklist on EPA's OUST website and indicated that it should be used to formulate a plan.
- LDF indicated a concern with Bristol making a recommendation of remedial options. LDF stated that Bristol should only evaluate options but should not make recommendations. This is because Bristol could recommend something that the EPA would not implement. That could be damaging because the information will be stored on WDNR's website.
- LDF asked when the next senior managers' call would be. EPA indicated that there wasn't one scheduled. EPA thought it might be a good idea to schedule one.
- LDF also inquired about the status of the MOA. EPA said that they would follow up on that.
- LDF stated that they look forward to including EPA and tribal input into the workplan going forward.
- The next check in call between LDF and EPA was scheduled for November 10th at 1pm.