

TABR Realty Services, LLC

June 2, 2021

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Martin McComb, OSC McComb.Martin@epa.gov
U.S. Environmental Protection Agency Region 8
1595 Wynkoop Street
Denver, CO 80202-1129

**RE: MONTHLY PROGRESS REPORT
 ILLINOIS GULCH SUPERFUND SITE
 MAY 2021 REPORTING PERIOD**

Dear Messrs. Peronard and McComb:

This monthly progress report is submitted in accordance with Paragraph 37 of the Unilateral Administrative Order for Removal Action (“UAO”) issued to Respondent, TABR Realty Services, LLC (“TABR”) by U.S. EPA Region 8, Docket No. CERCLA-08-2020-0003 (Effective Date of September 14, 2020). This progress report describes activities associated with the Removal Action that were completed after the Effective Date during this May reporting period, and the objectives and planned activities for the next reporting period.

Objectives

The objectives for the May reporting period were to:

- Conduct a Site visit with Removal Action construction bidders on May 21, 2021.
- Submit the Final Sampling Analysis Plan/Quality Assurance Project Plan (SAP/QAPP) for Residential Yards within 30 days of receipt of EPA’s comments on the draft SAP/QAPP for Residential Yards.

The Site visit with Removal Action construction bidders was held on May 21, as planned. TABR submitted the draft SAP/QAPP to EPA on April 23, 2021. TABR has not received comments from EPA in review of the submitted SAP/QAPP for Residential Yards.

Objectives for the June reporting period are as follows:

- Receive bids from Removal Action construction bidders on June 4, 2021.
- Select a Removal Action construction contractor by targeted date of June 11, 2021.
- Commence the Geotechnical Investigation, as described in the approved 2021 Removal Design Work Plan, by the end of June 2021.
- Submit the Final SAP/QAPP for Residential Yards within 30 days of receipt of EPA’s comments on the draft SAP/QAPP for Residential Yards.

Current Operations

TABR distributed a Request for Proposal (RFP) to three qualified prospective Removal Action construction contractors (Entact; Environmental Restoration, LLC; and Envirocon) on April 30, 2021. Entact subsequently informed TABR that it did not plan to submit a bid. TABR approached four additional qualified construction firms with the RFP but none of these firms were interested in submitting a bid.

Planned Activities

TABR expects bids from Environmental Restoration, LLC and Envirocon on June 4, 2021, and TABR's goal is to award the construction contract by June 11, 2021, subject to successfully negotiating a contract acceptable to both parties.

The draft SAP/QAPP for Residential Yards describes a sampling and analysis program for seven private properties on Brooks Hill Drive. Analytical data from the program will be provided to EPA for its use in assessing potential human health risks and whether residential yard remediation is required.

TABR offers to support EPA's community engagement efforts to share and explain the planned 2021 construction activities. TABR requests that EPA provide an update on its efforts to secure access to the seven residential properties on Brooks Hill Drive. TABR requires access to these properties for the purpose of collecting soil samples per the SAP/QAPP for Residential Properties, as required by the UAO and SOW. In addition to access for sampling, TABR requires access to the property at 1210 Brooks Hill Drive, by mid-June 2021. TABR will need to cross the westernmost extent of this residential property to access the Willard waste rock pile for the purpose of conducting the geotechnical investigation required by the UAO and SOW.

TABR appreciates EPA's May 28, 2021 update regarding EPA's efforts to confirm access to privately owned property in the vicinity of the Puzzle Extension Shaft in Illinois Gulch. TABR requires access to this property by mid-June 2021 as part of the aforementioned geotechnical investigation and also to implement a portion of the Removal Action.

Please contact me if there are questions regarding this monthly progress report.

Sincerely,

Edwin (Eddie) Downey, Project Coordinator for TABR Realty Services, LLC

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