

# TABR Realty Services, LLC

January 3, 2022

Paul Peronard, OSC                      Peronard.Paul@epa.gov  
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  
         DECEMBER 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 December reporting period, and the objectives and planned activities for the next reporting period.

## **Objectives**

The objectives for the December reporting period were to:

- Continue preparation of the draft Phase 1 Construction Completion Report (“CCR”).
- Initiate preparation of the draft Water Quality Monitoring/Bench-Scale Testing Work Plan.
- 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.

The first two objectives were met. Regarding the third objective, 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 January reporting period are to:

- Continue preparation of the draft Phase 1 CCR.
- Continue preparation of the draft Water Quality Monitoring/Bench-Scale Testing Work Plan.
- 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**

The Phase 1 construction work concluded on November 8, 2021.<sup>1</sup> Per the UAO and its attached Statement of Work (“SOW”), the draft Phase 1 CCR is to be submitted 90 days following conclusion of the Removal Action construction. Thus, the draft Phase 1 CCR will be submitted to EPA on or before February 7, 2022.<sup>2</sup>

The UAO/SOW requires submission of the draft Water Quality Monitoring/Bench-Scale Testing Work Plan by March 31, 2022. The Alloy Group of Anaconda, MT, has been retained as a subcontractor to Formation Environmental, LLC to assist with preparation of this Work Plan and to provide expertise regarding semi-passive treatment of the combined discharges from the Willard No. 1 and Willard No. 2 adits.

## **Planned Activities**

TABR will continue work on the draft CCR and the draft Water Quality Monitoring/Bench-Scale Testing Work Plan. TABR will also prepare the Final SAP/QAPP for Residential Yards if comments on the draft Work Plan are provided by EPA.

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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<sup>1</sup> As described in the November 2021 monthly report, repair work will be implemented in spring 2022 to address leakage from the settling pond outlet structure.

<sup>2</sup> The UAO/SOW identifies this deliverable as the “Construction Completion Report (Phases 1 and 2)” and requires submission of this draft document “90 days following the conclusion of the Phase 1 and Phase 2 removal action construction.” However, as clarified with EPA (P. Peronard) on October 5, 2021, it is appropriate for the CCR to address Phase 1 only given that Phase 2 consists of water quality monitoring and bench-scale testing rather than construction activities.