

TABR Realty Services, LLC

February 2, 2022

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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
 JANUARY 2022 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 January reporting period, and the objectives and planned activities for the next reporting period.

Objectives

The objectives for the January reporting period were to:

- Continue preparation of the draft Phase 1 Construction Completion Report (“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.

The first two objectives were met. The draft Phase 1 CCR was submitted to EPA and the State on January 28, 2022. 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 February reporting period are to:

- Continue preparation of the draft Water Quality Monitoring/Bench-Scale Testing Work Plan.
- Submit the Final Phase 1 CCR within 30 days of receipt of EPA’s comments on the draft Phase 1 CCR.
- 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

As described in prior monthly reports, the Phase 1 construction work concluded on November 8, 2021. Per the UAO and its attached Statement of Work (“SOW”), the draft Phase 1 CCR was to be submitted 90 days following conclusion of the Removal Action construction, which would be on or before February 7, 2022.¹ TABR submitted the draft Phase 1 CCR to EPA and the State through provision of a download link on January 28, 2022, well in advance of the required submission date.

The UAO/SOW requires submission of the draft Water Quality Monitoring/Bench-Scale Testing Work Plan by March 31, 2022. As stated in the December 2021 monthly report, the Alloy Group of Anaconda, MT, has been retained as a subcontractor to Formation Environmental, LLC to assist with preparation of this draft Work Plan and to provide expertise regarding the efficacy of semi-passive treatment of the combined flows from the Willard No. 1 and Willard No. 2 adits.

Planned Activities

TABR will continue work on 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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¹ 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.