

TABR Realty Services, LLC

April 4, 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
 MARCH 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 March reporting period, and the objectives and planned activities for the next reporting period.

Objectives

The objectives for the March reporting period were to:

- Continue preparation of the draft Water Quality Monitoring/Bench-Scale Testing Work Plan (“Work Plan”) with submission to EPA by March 31, 2022.
- Submit the Final Phase 1 Construction Completion Report (“CCR”) by March 27, 2022 (i.e., 30 days following EPA’s approval of the draft Phase 1 CCR, as written).
- 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 Work Plan was submitted to EPA on March 30, 2022. The Final Phase 1 CCR was made available to EPA by download link on March 2, 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 April reporting period are to:

- Submit the Final Work Plan within 30 days of receipt of EPA’s comments on the draft 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

Pursuant to Paragraph 26 of the UAO, TABR hereby informs EPA that SVL Analytical of Kellogg, Idaho has been selected to provide laboratory testing services related to implementation of the Work Plan. SVL will be subcontracted through Formation Environmental, LLC. As noted in previous monthly reports, Alloy Group of Anaconda, Montana has also been subcontracted by Formation to provide technical assistance regarding potential passive water treatment approaches.

Planned Activities

TABR will prepare the Final Work Plan following receipt of EPA's comments on the draft Work Plan. TABR will also prepare the Final SAP/QAPP for Residential Yards if comments on the draft SAP/QAPP are provided by EPA.

TABR is monitoring snow conditions in the project area as they relate to Site access with the intent to implement 2021 punch-list activities and initiate water-quality monitoring in May 2022.¹ Specifically, when access allows, TABR's construction contractor, Environmental Restoration LLC ("ER"), will return to the Site to drain the lined pond and repair the pond outlet structure to address the leakage issues described in previous monthly reports as well as the Final CCR. Flow rates during pond draining will be controlled using the outlet structure stop logs, and straw bales or other best management practices will be used to minimize pass-through of any pond sediment. ER will also remove erosion control measures from the Site later in 2022 after vegetation has become established.

As detailed in the draft Work Plan, water-quality sampling will be implemented weekly from May through July and then monthly from August through November, or until sampling locations are no longer accessible due to weather/snow. Through submission of the draft Work Plan, TABR provided EPA and the State with the advance notice required by Paragraph 41.a of the UAO as it relates to this planned sample collection activity. Specific planned sampling dates will be communicated to EPA based on TABR's assessment of Site access.

In addition, TABR will continue its preparation of the draft Phase 1 Post-Removal Site Control Plan, which is due for submittal to EPA by May 26, 2022, and will propose the activities TABR plans to conduct to maintain the effectiveness and integrity of the removal action elements constructed as part of the Phase 1 work.

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

Sincerely,

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

319-355-5489

edowney@aeagonam.com

cc:	Doug Naftz – USEPA	Naftz.Douglas@EPA.gov
	Mark Rudolph – CDPHE	Mark.Rudolph@state.co.us
	Aron Hansen – AEGON	Ahansen@aeagonam.com
	Blaine Shaffer – AEGON	Bshaffer@aeagonam.com
	Anne Faeth-Boyd – AEGON	Anne.FaethBoyd@aeagonam.com
	Sherilyn Pastor – McCarter & English	Spastor@mccarter.com

¹ Initiation of water-quality monitoring assumes EPA's prior approval of the Work Plan.

William Duffy – Davis Graham & Stubbs	William.duffy@dgsllaw.com
Lucas Satterlee – Davis Graham & Stubbs	Lucas.satterlee@dgsllaw.com
Brian Hansen – Formation	Bhansen@formationenv.com