

# TABR Realty Services, LLC

July 1, 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  
      JUNE 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 June reporting period, and the objectives and planned activities for the next reporting period.

## **Objectives**

The objectives for the June reporting period were to:

- Continue implementation of the field monitoring program described in the approved Water Quality and Bench-Scale Testing Work Plan (“Work Plan”).
- Implement repairs to the lined pond outlet structure to address the leakage issues described in previous monthly reports as well as the Final Phase 1 Construction Completion Report.

These objectives were met.

## **Current Operations**

TABR’s consultant, Formation Environmental (“Formation”), implemented field monitoring activities at the Site on June 1, June 7, June 15, June 22, and June 29, 2022, in accordance with the Work Plan.

Per TABR’s June 14, 2022, notification to EPA, TABR’s construction contractor, Environmental Restoration (“ER”), initiated draining of the lined pond by means of a siphon pipe on June 21, 2022, in preparation for implementing repairs to the pond outlet structure. The flow from the Willard No. 1 adit was also rerouted around the lined pond, into its former flow path in the vegetated area to the north of the Willard Repository, to expedite pond draining. On June 22, 2022, approximately 24 hours after the pond draining process started, Formation measured field parameters in Illinois Gulch surface water near the Stephen C. West Ice Rink (stream station IG-01). The pH of Illinois Gulch at that time was 7.36, indicating minimal, if any, effects associated with the draining pond water (pH of approximately 3). ER returned to the Site on June 28, 2022, repaired the outlet structure by installing a gasket material behind the stop log bracket, and returned the Willard No. 1 flow to the lined pond. The lined pond continued to fill through the end of the reporting period (June 30, 2022).

Per TABR’s June 13, 2022, notification to EPA, Formation implemented the Spring 2022 Post-Removal Site Control (“PRSC”) inspection, as described in the approved Phase 1 PRSC Plan, on June 22, 2022. As will be discussed in the forthcoming PRSC Inspection Memorandum (described below), no issues were identified during this inspection as potentially affecting the effectiveness of the Phase 1 Removal Action work.

**Results of Sampling and Tests Received During the Reporting Period**

The table below identifies the numbers and types of field parameter measurements made and analytical results received during the June reporting period. A spreadsheet summarizing the field parameters is included with the emailed transmission of this progress report along with the electronic data deliverables (“EDDs”) that were received from the May and June reporting periods. Additional analytical data from the subcontracted laboratory (SVL Analytical, Inc.) are forthcoming and will be included in future progress reports. The data are in the process of being validated.

Date Received	Agency/Analyst	SDG	Description	Associated Event	Validated	No. Samples
6/27/2022	SVL Analytical Analytical, Inc.	X2E0304	Unvalidated EDD	20220517 Monthly	No	3
6/27/2022	SVL, Inc.	X2E0452	Unvalidated EDD	20220525 Monthly	No	4
6/1/2022	Formation Environmental	--	Field Parameters	20220601 Monthly	n/a	3
6/27/2022	SVL Analytical, Inc.	X2F0060	Unvalidated EDD		No	3
6/7/2022	Formation Environmental	--	Field Parameters	20220607 High Frequency	n/a	8
6/27/2022	SVL Analytical, Inc.	X2F0202	Unvalidated EDD		No	5
6/27/2022	SVL Analytical, Inc.	X2F0201	Unvalidated EDD		No	3
6/15/2022	Formation Environmental	--	Field Parameters	20220615 Monthly	n/a	3
6/22/2022	Formation Environmental	--	Field Parameters	20220622 Monthly	n/a	4

**Planned Activities**

As detailed in the Work Plan, water-quality sampling is being implemented weekly from May through July and will be implemented monthly from August through November, or until sampling locations are no longer accessible due to weather/snow. Through submission of the 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. During July, TABR plans to conduct the weekly sampling events on July 6, July 12, July 19, and July 26. It may be necessary to shift one or more of these dates by one day based on weather conditions. TABR will advise EPA regarding any changes to the planned sampling dates.

TABR will initiate preparation of the Spring 2022 PRSC Inspection Memorandum that will summarize observations from the June 22, 2022, PRSC inspection. Per the Phase 1 PRSC Plan, the draft Inspection Memorandum will be submitted to EPA within 60 days following the inspection, or by August 22, 2022.

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

Sincerely,

**Anne Faeth-Boyd, RG, PE**  
**Project Coordinator for TABR Realty Services, LLC**

319-355-8806

[Anne.FaethBoyd@aegonam.com](mailto:Anne.FaethBoyd@aegonam.com)

cc:	Doug Naftz – USEPA	<a href="mailto:Naftz.Douglas@EPA.gov">Naftz.Douglas@EPA.gov</a>
	Andrea Madigan – USEPA	<a href="mailto:Madigan.Andrea@EPA.gov">Madigan.Andrea@EPA.gov</a>
	Mark Rudolph – CDPHE	<a href="mailto:Mark.Rudolph@state.co.us">Mark.Rudolph@state.co.us</a>
	Aron Hansen – AEGON	<a href="mailto:Ahansen@aegonam.com">Ahansen@aegonam.com</a>
	Blaine Shaffer – AEGON	<a href="mailto:Bshaffer@aegonam.com">Bshaffer@aegonam.com</a>
	Sherilyn Pastor – McCarter & English	<a href="mailto:Spastor@mccarter.com">Spastor@mccarter.com</a>
	William Duffy – Davis Graham & Stubbs	<a href="mailto:William.duffy@dgsllaw.com">William.duffy@dgsllaw.com</a>
	Lucas Satterlee – Davis Graham & Stubbs	<a href="mailto:Lucas.satterlee@dgsllaw.com">Lucas.satterlee@dgsllaw.com</a>
	Brian Hansen – Formation	<a href="mailto:Bhansen@formationenv.com">Bhansen@formationenv.com</a>