

# TABR Realty Services, LLC

May 2, 2022

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U.S. Environmental Protection Agency Region 8  
1595 Wynkoop Street  
Denver, CO 80202-1129

**RE:    MONTHLY PROGRESS REPORT  
         ILLINOIS GULCH SUPERFUND SITE  
         APRIL 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 April reporting period, and the objectives and planned activities for the next reporting period.

## **Objectives**

The objectives for the April reporting period were to:

- Submit the Final Water Quality Monitoring/Bench-Scale Testing Work Plan (“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.

EPA approved the draft Work Plan without comment on April 20, 2022. Therefore, a subsequent Work Plan submission is no longer required. Regarding the second 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 May reporting period are to:

- Commence the field monitoring program described in the Work Plan.
- Submit the draft Phase 1 Post-Removal Site Control (“PRSC”) Plan to EPA by May 26, 2022.<sup>1</sup>
- 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.

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<sup>1</sup> The UAO/SOW identifies this deliverable as the “Draft Post-Removal Site Control (PRSC) Plan (Phases 1 and 2).” Per a March 3, 2022, email exchange between EPA and Formation Environmental, LLC (“Formation”), it was agreed that the PRSC Plan appropriately addresses only Phase 1 given that Phase 2 comprises a monitoring/testing program rather than Removal Action construction activities.

## **Current Operations**

TABR provided a letter to EPA on April 14, 2022, advising that TABR's previous Project Coordinator, Eddie Downey, was replaced by Anne Faeth-Boyd, RG, PE, effective May 2, 2022.

As noted in previous monthly reports, SVL Analytical of Kellogg, Idaho and Alloy Group of Anaconda, Montana have been subcontracted by Formation to provide analytical services and technical assistance regarding potential passive water treatment approaches, respectively.

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. Recent observations indicate that Site access should be possible beginning in early May.

## **Planned Activities**

TABR will prepare the Final SAP/QAPP for Residential Yards if comments on the draft SAP/QAPP are provided by EPA.

TABR's construction contractor, Environmental Restoration LLC ("ER"), will return to the Site in mid to late May 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 Phase 1 Construction Completion Report. TABR will notify EPA of the specific date for this work once it has been identified. Flow rates during pond draining will be controlled using the outlet structure stop logs, straw bales, and potentially other best management practices as appropriate 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 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 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 May, TABR plans to implement the weekly sampling on May 10, May 17, May 24, and May 31. 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 continue its preparation of the draft Phase 1 PRSC 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,

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

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