

TABR Realty Services, LLC

September 2, 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
 AUGUST 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 August reporting period, and the objectives and planned activities for the next reporting period.

Objectives

The objectives for the August reporting period were to:

- Continue implementation of the field monitoring program described in the approved Work Plan.
- Submit the Spring 2022 Post-Removal Site Control (“PRSC”) Inspection Memorandum to EPA by August 22, 2022 (60 days following the June 22, 2022, PRSC inspection).

These objectives were met.

The objectives for the September reporting period are to:

- Continue implementation of the field monitoring program described in the approved Work Plan.
- Initiate evaluation of data collected during 2022 to identify potential passive water treatment approaches.

Current Operations

TABR’s consultant, Formation Environmental (“Formation”), implemented field monitoring activities at the Site on August 17, 2022, in accordance with the Work Plan.

TABR submitted the Spring 2022 PRSC Inspection Memorandum to EPA on August 8, 2022. EPA provided its approval of the memorandum by email on the same day.

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 August reporting period. The subcontracted laboratory (SVL Analytical, Inc.) issued revised electronic data deliverables (“EDDs”) for select May and June analytical data with corrected detection limits. Those data were subsequently validated and are included with the emailed transmission of this progress report. A spreadsheet summarizing revised field parameters collected in June and July and those collected during the current August reporting period are also included. The revisions correct errors associated with field iron analyses and related sample dilutions. Additional analytical data from the subcontracted laboratory 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
8/9/2022	SVL Analytical, Inc.	X2E0304	Revised and validated EDD	May Week 2	Yes	4
8/9/2022	SVL Analytical, Inc.	X2E0452	Revised and validated EDD	May Week 3	Yes	6
8/9/2022	SVL Analytical, Inc.	X2F0060	Revised and validated EDD	May Week 4	Yes	5
8/9/2022	SVL Analytical, Inc.	X2F0202	Revised and validated EDD	June Week 1	Yes	5
8/9/2022	SVL Analytical, Inc.	X2F0201	Revised and validated EDD	June Week 1	Yes	5
8/17/2022	Formation Environmental	n/a	Field parameters	August	n/a	10
8/24/2022	Formation Environmental	n/a	Revised field parameters	June Week 4	n/a	4
8/24/2022	Formation Environmental	n/a	Revised field parameters	July Week 2	n/a	4

Planned Activities

As detailed in the Work Plan, water-quality sampling was 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.

TABR plans to conduct the next monthly sampling event on September 13, 2022. It may be necessary to shift this date by one day based on weather conditions. TABR will advise EPA regarding any changes to the planned sampling dates.

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

cc:	Doug Naftz – USEPA	Naftz.Douglas@EPA.gov
	Andrea Madigan – USEPA	Madigan.Andrea@EPA.gov
	Mark Rudolph – CDPHE	Mark.Rudolph@state.co.us
	Andy Martin – AEGON	AWmartin@aegonam.com
	Blaine Shaffer – AEGON	Bshaffer@aegonam.com
	Sherilyn Pastor – McCarter & English	Spastor@mccarter.com
	William Duffy – Davis Graham & Stubbs	William.duffy@dgsllaw.com
	Lucas Satterlee – Davis Graham & Stubbs	Lucas.satterlee@dgsllaw.com
	Brian Hansen – Formation	Bhansen@formationenv.com