

TABR Realty Services, LLC

October 10, 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
 SEPTEMBER 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 September reporting period, and the objectives and planned activities for the next reporting period.

Objectives

The objectives for the September 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”).
- Initiate evaluation of data collected during 2022 to identify potential passive water treatment approaches.

These objectives were met.

The objectives for the October reporting period are to:

- Continue implementation of the field monitoring program described in the approved Work Plan.
- Continue evaluation of data collected during 2022 to identify potential passive water treatment approaches.
- Conduct the Fall 2022 Post-Removal Site Control (“PRSC”) inspection event.

Current Operations

TABR’s consultant, Formation Environmental (“Formation”), measured water flow rates and collected water samples at the Site on September 13, 2022, in accordance with the Work Plan.

Formation has provided the currently available flow and water quality data for the Site to its water-treatment subcontractor, Alloy Group of Anaconda, MT. Both Formation and Alloy have initiated assessment of the data with respect to potential passive water-treatment approaches.

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 September reporting period. A spreadsheet summarizing the field parameters and an electronic data deliverable (“EDD”) for the analytical results are included with the emailed transmission of this progress report. 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
9/13/2022	Formation Environmental	n/a	Field parameters	September	n/a	11
9/24/2022	SVL Analytical, Inc.	X2H0344	Unvalidated EDD	August	No	8

Planned Activities

As detailed in the Work Plan, water-quality monitoring was conducted 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 conducted the Fall 2022 PRSC inspection event on October 5, 2022. TABR plans to conduct the next monthly sampling event on October 11, 2022. Representatives of Alloy Group will participate in this sampling event to familiarize themselves with the Site and to assist with field measurements of iron species.

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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