

TABR Realty Services, LLC

September 2, 2021

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 2021 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 Removal Action construction work, as described in the approved 2021 Removal Design Work Plan (“RDWP”).
- Receive and interpret geotechnical test results.
- Submit the Geotechnical Report to EPA, as required by the RDWP.
- 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.¹

The first two of these objectives were achieved. Receipt of the geotechnical analyses has been delayed due to heavy backlog at the subcontracted laboratory, but geotechnical analyses have proceeded based on conservative values of material properties based on the literature or engineering judgment, where needed. These analyses have been confirmed using test results from the laboratory. Delays associated with the geotechnical analyses have correspondingly delayed submission of the Geotechnical Report to EPA.

Objectives for the September reporting period are as follows:

- Continue implementation of the Removal Action construction work, as described in the RDWP.
- Submit the Geotechnical Report to EPA, as required by the RDWP.

¹ 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.

- 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 (see footnote 1).

Current Operations

The construction contractor, Environmental Restoration ("ER") continued the Removal Action construction work during the August reporting period. The access driveway to the Willard repository was substantially completed, including the installation of all required culverts. Additional erosion protection at two of the culvert inlets was deemed necessary by the Project Engineer and this work was subsequently completed. All of the accessible Cally waste rock pile was moved to the Willard repository and the remainder of the waste rock was covered with clean soil. Reshaping of the Willard repository, including the settling pond, was nearly complete at the close of the August reporting period. The settling pond outlet structure associated piping were installed.

Installation of the piping system in Illinois Gulch commenced in late August. By the close of the reporting period, surface water flow in Illinois Gulch had been directed around the work area, the inlet and outlet headwall areas had been excavated, the pre-cast drop structure mid-way along the system had been installed, and the twin 36-inch culverts had been installed.

Planned Activities

ER will continue the Removal Action construction work during September 2021 and expects substantial completion of the work at the end of September or in early October.

TABR expects to submit the Geotechnical Report to EPA in September 2021.

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@aegonam.com

cc:	Doug Naftz – USEPA	Naftz.Douglas@EPA.gov
	Mark Rudolph – CDPHE	Mark.Rudolph@state.co.us
	Nick Koluch – TABR	Nkoluch@aegonam.com
	Gregg Snitker – TABR	Gsnitker@aegonam.com
	Blaine Shaffer – TABR	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
	Curtis Stevens – The Sanitas Group	Cstevens@thesanitasgroup.com
	Brian Hansen – Formation	Bhansen@formationenv.com