

TABR Realty Services, LLC

August 3, 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
 JULY 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 July reporting period, and the objectives and planned activities for the next reporting period.

Objectives

The objectives for the July reporting period were to:

- Mobilize Environmental Restoration, LLC (“ER”) to the Site during the week on July 6, 2021.
- Initiate the Removal Action construction work, as described in the 2021 Removal Design Work Plan (“RDWP”), following mobilization.
- Receive and interpret geotechnical test results.

The first two of these objectives were achieved. The subcontracted geotechnical testing laboratory has not yet provided the geotechnical test results due to heavy backlog, but preliminary slope stability analyses have proceeded based on literature values of material properties. These analyses will be confirmed upon receipt of the test results from the laboratory.

Objectives for the August reporting period are as follows:

- Continue implementation of the Removal Action construction work, as described in the 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

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.

Current Operations

ER began mobilization to the Site on July 6, 2021. Initial work included set-up of a construction management trailer and attendant facilities on a rented lot near the intersection of Boreas Pass Road and Bright Hope Road. Stormwater best management practices (“BMPs”), including silt fences and straw wattles, were then installed. The alignment for the new access driveway was cleared and grubbed and driveway construction commenced. Initial clearing and grading of the Willard waste rock pile also began. By the close of the July reporting period, the access driveway was nearly completed, accessible portions of the Cally waste rock pile had been removed, and reshaping of the Willard waste rock pile was underway.

TABR implemented additional test pitting around the periphery of the Willard waste rock pile on July 7, 2021, to investigate the presence of low-strength peat deposits in areas that will be overlain by the expanded footprint of the Willard repository. The test pits were completed by ER personnel using an excavator and were logged and sampled by Formation Environmental’s geotechnical engineer. Soil samples collected from the test pits were submitted to Advanced Terra Testing of Lakewood, Colorado for analysis.

TABR has submitted three Engineering Change Orders (“ECO”) to EPA as part of the Removal Action construction work:

- ECO #1, regarding an alternative liner material for the settling pond, was submitted on June 17, 2021.
- ECO #2, regarding foundation improvements for a portion of the access driveway, was submitted on June 19, 2021.
- ECO #3, regarding foundation improvements for the north and west embankments of the Willard repository, was submitted on July 30, 2021.

EPA approved each of these ECOs.

Planned Activities

ER will continue the Removal Action construction work during August 2021.

TABR should receive the geotechnical test results in August 2021. Those results will be summarized and interpreted in a Geotechnical Report that is expected to be submitted to EPA in late August 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@aeonam.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