

TABR Realty Services, LLC

December 1, 2021

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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
 NOVEMBER 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 November reporting period, and the objectives and planned activities for the next reporting period.

Objectives

The objectives for the November reporting period were to:

- Conclude implementation of the Phase 1 Removal Action construction work as described in the approved 2021 Removal Design Work Plan (“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.

The Phase 1 construction work concluded with the installation of the locking Site access gate near the intersection of the access driveway and Boreas Pass Road on November 8, 2021, though leakage still occurs in the lined pond outlet structure. “No Trespassing” signs were also installed at key locations around the Site in early November 2021.

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 December reporting period are to:

- Continue preparation of the draft Phase 1 Construction Completion Report (“CCR”).
- Initiate preparation of the draft Water Quality Monitoring/Bench-Scale Testing Work Plan.

Current Operations

As discussed in the previous (October) monthly report, leakage was noted in the outlet structure from the lined pond which prevented the pond from filling to the design water surface elevation. The leakage occurs around

brackets that support “stop logs” in the outlet structure that are used to vary the pond surface elevation and/or to drain the pond when necessary. Environmental Restoration (“ER”) attempted to eliminate the leakage on several occasions in early November but was unsuccessful. Given the onset of winter with freezing temperatures and the need to remove and reinstall the stop log brackets to address the leakage, TABR and ER have made plans to defer the repairs until spring 2022 when warmer weather returns.¹ The water surface in the pond appears to have stabilized at an elevation that is approximately 1.5 feet below the design elevation. Thus, the pond is approximately 3.5 feet deep at the outlet structure. Observations indicate that settling of iron is occurring in water impounded in the pond.

Field measurements were made on flows into and out of the lined pond on November 4, 2021, as summarized below.

**Illinois Gulch Lined Pond Inflows/Outflows
Field Measurements – 11/4/2021**

Field Measurement	LPI-1	LPI-2	LPD
Temperature (°C)	7.1	6.8	7.4
Dissolved Oxygen (mg/l)	8.45	6.17	8.16
Specific Conductance (µS/cm)	673	510	605
pH	3.70	5.84	3.93
Oxidation-Reduction Potential (mV)	374	146	335
Turbidity (NTU)	15	2.8	14

Notes:

LPI-1 is inflow to the lined pond from the Willard No. 1 adit.

LPI-2 is inflow to the lined pond from the Willard No. 2 adit.

LPD is the lined pond discharge at the Parshall flume.

With prior notice and EPA’s approval, a sample of flow exiting the pond (station LPD) was collected on November 4, 2021 and submitted for laboratory analysis. The analytical results for this sample are provided as an electronic data deliverable with this monthly report. The flow rate at LPD was measured at 20.5 gallons per minute (“gpm”) at the time of sample collection. However, due to the aforementioned leakage at the outlet structure, this measurement does not reflect the true combined flow rate from the Willard Nos. 1 and 2 adits.² A flow measurement of 24.5 gpm was made a few days earlier (October 28, 2021) when the stop logs were absent from the outlet structure. This measurement is viewed as more representative of the combined adit flows for the late October/early November 2021 time frame.

As discussed above, the Phase 1 construction work concluded on November 8, 2021. Per the UAO and its attached Statement of Work (“SOW”), the draft Phase 1 CCR is to be submitted 90 days following conclusion of the Removal Action construction. Thus, the draft Phase 1 CCR will be submitted to EPA on or before February 7, 2021.³

¹ EPA (P. Peronard) was informed of the leakage situation by voice mail from Formation (B. Hansen) on November 22, 2021.

² At the time of sample collection, the leakage rate at the outlet structure appeared to be less than the combined inflows from the Willard Nos. 1 and 2 adits, and thus the pond was slowly filling.

³ The UAO/SOW identifies the deliverable as the “Construction Completion Report (Phases 1 and 2)” and requires submission of this draft document “90 days following the conclusion of the Phase 1 and Phase 2 removal action construction.” However, as clarified with EPA (P. Peronard) on October 5, 2021, it is appropriate for the CCR to address Phase 1 only given that Phase 2 consists of water quality monitoring and bench-scale testing rather than construction activities.

Planned Activities

TABR will continue work on the draft CCR and will initiate development of the draft Water Quality Monitoring/Bench-Scale Testing Work Plan.

Please contact me if there are questions regarding this monthly progress report.

Sincerely,

Edwin (Eddie) Downey, Project Coordinator for TABR Realty Services, LLC

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