

# TABR Realty Services, LLC

March 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  
      FEBRUARY 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 February reporting period, and the objectives and planned activities for the next reporting period.

## **Objectives**

The objectives for the February reporting period were to:

- Continue preparation of the draft Water Quality Monitoring/Bench-Scale Testing Work Plan.
- Submit the Final Phase 1 CCR within 30 days of receipt of EPA’s comments on the draft Phase 1 CCR.
- 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 first objective was met. For the second objective, EPA approved the draft Phase 1 CCR as written on February 25, 2022 and requested that TABR finalize the report. Regarding the third 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 March reporting period are to:

- Continue preparation of the draft Water Quality Monitoring/Bench-Scale Testing Work Plan with submission to EPA by March 31, 2022.
- Submit the Final Phase 1 CCR by March 27, 2022 (i.e., 30 days following EPA’s approval of the draft Phase 1 CCR, as written).
- 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.

## **Current Operations**

The UAO/SOW requires submission of the draft Water Quality Monitoring/Bench-Scale Testing Work Plan by March 31, 2022. As stated in the December 2021 and January 2022 monthly reports, the Alloy Group of Anaconda, MT, has been retained as a subcontractor to Formation Environmental, LLC to assist with preparation of this draft Work Plan and to provide expertise regarding the efficacy of semi-passive treatment of the combined flows from the Willard No. 1 and Willard No. 2 adits.

## **Planned Activities**

TABR will continue work on the draft Water Quality Monitoring/Bench-Scale Testing Work Plan. TABR will also prepare the Final SAP/QAPP for Residential Yards if comments on the draft Work Plan are provided by EPA.

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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