

# TABR Realty Services, LLC

August 5, 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  
         JULY 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 July reporting period, and the objectives and planned activities for the next reporting period.

## **Objectives**

The objectives for the July 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 preparation of the Spring 2022 Post-Removal Site Control (“PRSC”) Inspection Memorandum that will summarize observations from the June 22, 2022, PRSC inspection.

These objectives were met.

The objectives for the August reporting period are to:

- Continue implementation of the field monitoring program described in the approved Work Plan.
- Submit the Spring 2022 PRSC Inspection Memorandum to EPA by August 22, 2022 (60 days following the June 22, 2022, PRSC inspection).

## **Current Operations**

TABR’s consultant, Formation Environmental (“Formation”), implemented field monitoring activities at the Site on July 6, July 13, July 20, and July 27, 2022, in accordance with the Work Plan.

As described in the previous (June 2022) monthly report, TABR’s construction contractor, Environmental Restoration (“ER”), effected repairs to address leakage within the lined pond outlet structure on June 28, 2022. ER returned to the Site in early July and determined that, though reduced, leakage was still occurring. ER

implemented additional repairs to the outlet structure on July 12 and 13, 2022, and the leakage now appears to be minimal and the issue has been resolved.

### **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 July reporting period. A spreadsheet summarizing the field parameters and electronic data deliverables (“EDDs”) 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.

<b>Date Received</b>	<b>Agency/Analyst</b>	<b>SDG</b>	<b>Description</b>	<b>Associated Event</b>	<b>Validated</b>	<b>No. Samples</b>
7/7/2022	SVL Analytical, Inc.	X2F0339	Unvalidated EDD	Monthly, June Week 2	No	3
7/16/2022	SVL Analytical, Inc.	X2F0516	Unvalidated EDD	Monthly, June Week 3	No	4
7/20/2022	SVL Analytical, Inc.	X2F0605	Unvalidated EDD	Monthly, June Week 4	No	2
7/20/2022	Formation Environmental	n/a	Field Parameters	Monthly, June Week 4	n/a	9
7/6/2022	Formation Environmental	n/a	Field Parameters	High Frequency, July Week 1	n/a	10
7/29/2022	SVL Analytical, Inc.	X2G0243	Unvalidated EDD	Monthly, July Week 2	No	2
7/29/2022	Formation Environmental	n/a	Field Parameters	Monthly, July Week 2	n/a	9
7/20/2022	Formation Environmental	n/a	Field Parameters	Monthly, July Week 3	n/a	10
7/26/2022	Formation Environmental	n/a	Field Parameters	Monthly, July Week 4	n/a	10

### **Planned Activities**

As detailed in the Work Plan, water-quality sampling was implemented 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.

During August, TABR plans to conduct the monthly sampling event on August 16. It may be necessary to shift this date by one day based on weather conditions. TABR will advise EPA regarding any changes to the planned sampling dates.

TABR will submit the Spring 2022 PRSC Inspection Memorandum to EPA within 60 days following the inspection, or by August 22, 2022.

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**

319-355-8806

[Anne.FaethBoyd@aegonam.com](mailto:Anne.FaethBoyd@aegonam.com)

cc:	Doug Naftz – USEPA	<a href="mailto:Naftz.Douglas@EPA.gov">Naftz.Douglas@EPA.gov</a>
	Andrea Madigan – USEPA	<a href="mailto:Madigan.Andrea@EPA.gov">Madigan.Andrea@EPA.gov</a>
	Mark Rudolph – CDPHE	<a href="mailto:Mark.Rudolph@state.co.us">Mark.Rudolph@state.co.us</a>
	Andy Martin – AEGON	<a href="mailto:AWmartin@aegonam.com">AWmartin@aegonam.com</a>
	Blaine Shaffer – AEGON	<a href="mailto:Bshaffer@aegonam.com">Bshaffer@aegonam.com</a>
	Sherilyn Pastor – McCarter & English	<a href="mailto:Spastor@mccarter.com">Spastor@mccarter.com</a>
	William Duffy – Davis Graham & Stubbs	<a href="mailto:William.duffy@dgsllaw.com">William.duffy@dgsllaw.com</a>
	Lucas Satterlee – Davis Graham & Stubbs	<a href="mailto:Lucas.satterlee@dgsllaw.com">Lucas.satterlee@dgsllaw.com</a>
	Brian Hansen – Formation	<a href="mailto:Bhansen@formationenv.com">Bhansen@formationenv.com</a>