

# TABR Realty Services, LLC

June 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  
       MAY 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 May reporting period, and the objectives and planned activities for the next reporting period.

## **Objectives**

The objectives for the May reporting period were to:

- Commence the field monitoring program described in the Final Water Quality Monitoring/Bench-Scale Testing Work Plan (“Work Plan”).
- Submit the draft Phase 1 Post-Removal Site Control (“PRSC”) Plan to EPA by May 26, 2022.<sup>1</sup>
- 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 two objectives were achieved. Regarding the third objective, TABR submitted the draft SAP/QAPP for Residential Yards to EPA on April 23, 2021. On May 25, 2022, EPA provided an e-mail transmission to TABR’s consultant, Formation Environmental, LLC (“Formation”), stating EPA’s conclusion that *“a sampling effort by TABR and/or a yard cleanup is unneeded”* and *“No further work on this front is required.”* Based on these statements, TABR understands that EPA views all remaining obligations related to Paragraph 6 of the UAO’s Statement of Work (“Implement soil sampling at residential properties on Brooks Hill Drive to the South of Bright Hope Circle”) as no longer applicable as part of the Phase 1 Work required by the UAO. TABR requests a written response from EPA should this understanding be inaccurate.

Objectives for the June reporting period are to:

- Continue implementation of the field monitoring program described in the Work Plan.

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<sup>1</sup> The UAO/SOW identifies this deliverable as the “Draft Post-Removal Site Control (PRSC) Plan (Phases 1 and 2).” Per a March 3, 2022, email exchange between EPA and Formation, it was agreed that the PRSC Plan appropriately addresses only Phase 1 given that Phase 2 comprises a monitoring/testing program rather than Removal Action construction activities.

- Implement repairs to the lined pond outlet structure to address the leakage issues described in previous monthly reports as well as the Final Phase 1 Construction Completion Report.

### **Current Operations**

TABR’s consultant, Formation, implemented field monitoring activities at the Site on May 10, May 17, and May 25, 2022 in accordance with the Work Plan.

TABR submitted the draft PRSC Plan to EPA on May 20, 2022. EPA provided its approval of the PRSC Plan, without comment, on May 23, 2022.

As described in the previous monthly report, TABR had planned to implement repairs to the lined pond outlet structure in May 2022. TABR will now implement those repairs in June 2022.

### **Results of Sampling and Tests Received During the Reporting Period**

The table below identifies the numbers and types of field parameter measurements made during the monitoring events conducted by TABR during the May reporting period. The field parameters are being included with the emailed transmission of this progress report. The electronic data deliverables (“EDDs”) providing analytical data from the subcontracted laboratory (SVL Analytical, Inc.) are forthcoming and will be included in future progress reports.

<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>
5/10/2022	Formation Environmental	n/a	Field Parameters	High Frequency, May	n/a	10
5/17/2022	Formation Environmental	n/a	Field Parameters	Monthly, May	n/a	9
5/25/2022	Formation Environmental	n/a	Field Parameters	Monthly, May	n/a	12

### **Planned Activities**

TABR’s construction contractor, Environmental Restoration LLC (“ER”), will return to the Site in mid to late June to drain the lined pond and repair the pond outlet structure to address the leakage issues described in previous monthly reports as well as the Final Phase 1 Construction Completion Report. TABR will notify EPA of the specific date for this work once it has been identified. Flow rates during pond draining will be controlled using the outlet structure stop logs and potentially other best management practices as appropriate to minimize pass-through of any pond sediment. ER will also remove erosion control measures from the Site later in 2022 after vegetation has become established.

As detailed in the Work Plan, water-quality sampling is being implemented weekly from May through July and then 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 June, TABR plans to implement the weekly sampling events on June 1, June 7, June 14, June 21, and June 28. It may be necessary to shift one or more of these dates by one day based on weather conditions. TABR will advise EPA regarding any changes to the planned sampling dates.

TABR will implement the Spring 2022 PRSC inspection, as described in the PRSC Plan, in mid to late June.

