REGION 10
SEATTLE, WA 98101

July 30, 2024

MEMORANDUM

SUBJECT: Comments on the 2024 Leave Surface Sampling and Analysis Plan
Crawford Street South Site, Portland, Oregon
ECSI # 2363
June 13, 2024

FROM: Laura Hanna, RG, Remedial Project Manager
Superfund and Emergency Management Division, EPA

TO: Kevin Dana, Project Manager
NWR Cleanup, Oregon Department of Environmental Quality

The following are the U.S. Environmental Protection Agency's (EPA's) comments on the document titled *2024 Leave Surface Sampling and Analysis Plan* (LSSAP). The LSSAP was prepared by GeoEngineers for Crawford Street South (Site). The Site is located at 8524 North Crawford Street in Portland, Oregon and listed as Environmental Cleanup Site Information (ECSI) #2363. The Site is located on the eastern side of Willamette River upland of the Willamette Cove and Cathedral Park remedial design project areas within the Portland Harbor Superfund Site (PHSS). The LSSAP focuses on the soil and bank erosion upland source contaminant transport pathways.

EPA understands the LSSAP was prepared in support of the 60% Riverbank Design Report for the Site. EPA's comments are categorized as "Primary," which identify concerns that must be resolved to achieve the objective; and "To Be Considered," which, if addressed or resolved, would reduce uncertainty, improve confidence in the document's conclusions, and/or best support the objectives.

Primary Comments

1. **Additional Sampling at XS13:** PHSS Record of Decision (ROD; EPA, 2017) remedial action level (RAL) exceedances for PCBs and PAHs have been identified in riverbank soils on the adjacent Willamette Cove (WC) property, approximately 60 to 65 feet from transect XS13 (WC Group, 2024). There are no existing or proposed sample points between XS13-70R and XS13-TOE, but the Willamette Cove data suggests potential for contamination along XS13, particularly between offset ~100 and 130 feet (see LSSAP Figure 21g). EPA recommends adding sample locations in this

area to help laterally bound the riverbank contamination and to inform the 60% Design and/or incorporating WC Group data.

2. **Scope of Leave Surface Sampling**: Revise the LSSAP to clarify why, according to Section 1.0, "additional sampling above mean high water is not needed." Based on Figures 21a-g, along several transects at different sample points, there is no data at or within ~3 feet vertically of the newly proposed leave surface. For example, at XS3-51, there is a RAL exceedance just above the leave surface, however there are no existing or proposed sample points at or below the leave surface. For most other transects there seems to be a lack of data at the leave surface, particularly in the upper bank. This appears to be a data gap and may be insufficient to support remedial design.

To Be Considered

1. **Consistency with 30% Drawings**: The LSSAP cross-section figures and historical sampling data should be reviewed and revised as needed for consistency with the *Preliminary (30%) Design Report Riverbank Source Control Measure* (30% Design; GeoEngineers, 2023). There are several locations where data presented in the LSSAP figures do not match the 30% Design figures so a clarification should be provided as it appears color coding has been updated between deliverables. For example, XS3-OHW is depicted as having only PHSS ROD cleanup level (CUL) exceedances in LSSAP Figure 21b which matches data presented in Table 4, but the corresponding 30% Design Figure 5b shows a RAL exceedance in the lower interval at this location.

2. **Proposed Capping Extent**: EPA recommends that the LSSAP text, figures and/or typical sections in Appendix A be revised to clarify the physical extent of capping being considered. The typical sections in Appendix A show that the cap may not cover the upper bank. However, there are several locations on the upper/mid bank and outside of this presumed capped area where additional leave surface sampling data may be necessary if these locations are indeed not being capped (e.g., XS3-51, refer to primary comment #2).

3. **Depth of Contamination (DOC):** DOC should be determined for locations in the in-water region where a dredge-only remedy is being proposed. EPA considers DOC to have been established when there are at least two clean 1-foot intervals underlying a contaminated interval. EPA therefore recommends revising the LSSAP to analyze both samples in potential dredge-only areas, instead of archiving the lower interval as currently proposed.

4. **Cathedral Park and Willamette Cove Data**: As sediment and riverbank sampling data from investigations at the Cathedral Park and Willamette Cove remedial design project areas become available, the Crawford Street South team should incorporate these data into the Crawford riverbank design.

References

EPA. 2017. *Record of Decision. Portland Harbor Superfund Site. Portland, Oregon.* January.

GeoEngineers. 2023. *Preliminary (30%) Design Report Riverbank Source Control Measure. Crawford Street South Site. Portland, Oregon.* June 15.

Willamette Cove In-water Remedial Design Group. 2024. *Willamette Cove Supplemental Pre-Design Investigation Evaluation Report*. July.

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