



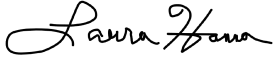
REGION 10

SEATTLE, WA 98101

July 30, 2024

MEMORANDUM

SUBJECT: Comments on the Addendum to Groundwater Source Control Evaluation Report
Crawford Street South Site, Portland, Oregon
ECSI # 2363
May 7, 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 *Addendum to Groundwater Source Control Evaluation Report* (GW SCE Addendum). The GW SCE Addendum 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).

EPA understands the GW SCE Addendum was prepared in response to Oregon Department of Environmental Quality (DEQ) comments (March 27, 2023) on the *Groundwater Source Control Evaluation Report* (2022 GW SCE; GeoEngineers, 2022a). EPA's comments are categorized as "To Be Considered," which, if addressed or resolved, would reduce uncertainty, improve confidence in the document's conclusions, and/or best support the objectives.

To Be Considered

1. EPA suggests a more holistic evaluation of the groundwater contamination near or within the riverbank and its fate and transport at a scale that pulls in existing groundwater information (both level and concentration) from the properties bordering the Site. Additionally, including the river stage would help to inform whether groundwater contamination found within the Site wells, particularly the slightly elevated arsenic and pesticide concentrations found near the riverbank to

evaluate if there is the potential to recontaminate the in-water remedy. EPA believes there is a low groundwater recontamination risk.

The adjacent properties and the river appear to influence the groundwater gradients conditions observed within the Site based on Figures 6 to 12 in the GW SCE Addendum. Groundwater concentrations are generally higher at the wells closer to the riverbank along the property boundaries upstream and downstream. EPA recommends the findings from the *July 2022 Revised Additional Riverbank Soil Data (GeoEngineers, 2022b)* and any available groundwater and porewater investigation information within, or immediately adjacent to, the Crawford Street property (e.g. in-water work at Willamette Cove) be incorporated to strengthen the evaluation and support conclusions under a multiple lines of evidence approach and conceptual site model basis of the groundwater source control evaluation. EPA notes that fund-lead porewater data will not be publicly available until approximately Q2 2025.

2. EPA recommends adding a description of the contouring method and a reassessment of the contouring and gradient relationships that incorporates the river elevation at the time the synoptic water level data were obtained for each of the gradient conditions¹. Because the groundwater source control evaluation relies heavily on the groundwater elevation contours and resulting gradients, a reassessment of the contouring and potential influences to the water levels measured in the wells is recommended.
 - a. EPA also recommends adding the surface water stage on Figure 6 through 12 for the given time period to allow for comparison between groundwater and Willamette River stage to evaluate the potential recontamination pathway towards the river.

References

GeoEngineers a., 2022. *Groundwater Pathway Source Control Evaluation*. Dated December 16, 2022.

GeoEngineers b., 2022. *Revised Additional Riverbank Soil Data*. Dated July 8, 2022.

cc: David Lacey, DEQ
Erin McDonnell, DEQ
Ken Thiessen, DEQ
Josie Clark, EPA
Eva DeMaria, EPA
Katie Young, CDM Smith

¹ This data could be obtained and transposed either from the Willamette Cove project area river staff gauge data if available for the specific time that matches the synoptic groundwater data collection period, or from the USGS gauge at Morrison Street Bridge with necessary adjustments in gradient and datum.