



# Oregon

Kate Brown, Governor

## Department of Environmental Quality

Northwest Region

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October 12, 2021

Amanda Spencer  
GeoEngineers, Inc.  
5820 S. Kelly Ave., Suite B  
Portland, OR 97239

RE: Approval of SCE Work Plan  
for Crawford Street South in Portland  
ECSI #2363

Amanda:

The Department of Environmental Quality (DEQ) has completed its review of the proposed final *Source Control Evaluation Work Plan*, prepared by GeoEngineers on August 16, 2021 for the Crawford Street South property, located at 8524 North Crawford Street in Portland. DEQ has also reviewed and considered the Response to Comments that were prepared by GeoEngineers and sent to DEQ on August 16.

In consultation with the U.S. Environmental Protection Agency (EPA), DEQ approves the *Source Control Evaluation Work Plan*, subject to the following considerations and caveats:

- It is not clear that the proposed scope of sampling at the site will determine the depth of principal threat waste (PTW) exceedances in the riverbank. If the depth of PTW exceedances is not determined, this will be a data gap that could potentially hold up approval of the riverbank remedial design.
- Six-inch sampling intervals were proposed for most of the upcoming soil and sediment sampling at the site. While acceptable for the upland riverbank soils, EPA has requested that the launchable toe leave surface sample locations (shown on Figure 11) and other sediment samples adjacent to in-water sediment management areas (i.e., PCB samples proposed along Transect XS1 on Figure 10) be collected from 12-inch sampling intervals, to ensure consistency with sampling conducted in the Willamette Cove and Cathedral Park In-Water Project Areas.
- While DEQ supports development and implementation of an interim stormwater source control measure at the site, if an interim control measure cannot be implemented due to permitting or other issues, a full stormwater evaluation as originally outlined in the Work Plan will need to be conducted.
- EPA found GeoEngineers' response to EPA's Primary Comment #3 (regarding PCB sampling in stormwater) to be "helpful and satisfactory", and asks that a similar explanation be added to Section 4.3.3 of the Work Plan.
- EPA found GeoEngineers' response to EPA's To Be Considered Comment #2 (regarding changes in stormwater drainage at the site) to be "clear and beneficial", and asks that a similar explanation be added to Section 4.3.1 of the Work Plan.

In all other respects, the *Source Control Evaluation Work Plan* is approved as written. Please prepare a final, signed and stamped work plan. DEQ requests one bound hard copy and one electronic copy of the final work plan for our records. If you have any questions, please contact me at (503) 229-5369, or via e-mail at [dana.kevin@deq.state.or.us](mailto:dana.kevin@deq.state.or.us). We appreciate your efforts and thank you for your work on this project.

Sincerely,

A handwritten signature in blue ink that reads "Kevin Dana". The signature is written in a cursive, flowing style.

Kevin Dana, Project Manager  
Northwest Region Cleanup Program

cc: Mat Cusma, Schnitzer Steel Industries  
Tom Leaptrott, Steel Hammer Properties  
Josie Clark, EPA (via e-mail)  
Eva DeMaria, EPA (via e-mail)  
Benjamin Leake, EPA (via e-mail)  
Caleb Shaffer, EPA (via e-mail)  
ECSI #2363 File