



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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December 21, 2021

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

RE: Comments on Interim Stormwater SCM Work Plan
for Crawford Street South in Portland
ECSI #2363

Amanda:

The Department of Environmental Quality (DEQ) has completed its review of the *Interim Stormwater Source Control Measures Work Plan*, prepared by GeoEngineers on December 2, 2021 for the Crawford Street South property, located at 8524 North Crawford Street in Portland.

In consultation with the U.S. Environmental Protection Agency (EPA) and the Five Tribes, DEQ generally approves the *Interim Stormwater Source Control Measures Work Plan*, subject to the following comments:

- The memo states that the proposed berm will be “installed around the interior perimeter of the fenced area along the base of the fence.” It is not clear from the description or from the attached figures if the berm will impact the monitoring wells that were recently installed at the top of the riverbank. An additional figure showing the proposed berm in relation to the monitoring wells would be helpful.
- A previous effort to implement a stormwater source control measure (SCM) at the site was stymied, in part, by concerns that stormwater infiltration could mobilize soil and groundwater contamination. Consideration should be given to utilizing the new top-of-riverbank monitoring wells to alleviate any similar concerns with the current proposal.
- A rough estimation of the duration of the interim SCM should be added to Table 1, so that the expected time until a permanent stormwater SCM is implemented at this site can be considered and evaluated by the reviewers.
- A title page for Attachment A should be inserted between Figure 3 and Figure 9.

In all other respects, the *Interim Stormwater Source Control Measures Work Plan* is approved as written. Please prepare a final version for our records.

If you have any questions, please contact me at (503) 229-5369, or via e-mail at kevin.dana@deq.oregon.gov. (Note that my e-mail address has recently changed). 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
Bill Beckley, Ridolfi (via e-mail)
Jennifer Hart, IEc (via e-mail)
Benjamin Leake, EPA (via e-mail)
ECSI #2363 File