



# Oregon

Kate Brown, Governor

## Department of Environmental Quality

Northwest Region

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July 16, 2021

Amanda Spencer  
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5820 S. Kelly Ave., Suite B  
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RE: Comments on Draft Source Control Evaluation Work Plan  
for Crawford Street South in Portland  
ECSI #2363

Amanda:

The Department of Environmental Quality has completed review of the draft *Source Control Evaluation Work Plan* prepared by Cascadia on May 7, 2021 for the Crawford Street South property, located at 8524 North Crawford Street in Portland. DEQ offers this letter of comment for your consideration.

In addition, DEQ provided the draft *Source Control Evaluation Work Plan* to the United States Environmental Protection Agency for review and comment. DEQ concurs with EPA's comments and requests that they be addressed in the revised work plan.

### DEQ General Comments:

1. Section 5.2 of the work plan discusses the installation of nine groundwater monitoring wells at the site. Figure 13 shows the proposed placement of the wells. As currently proposed, the placement of the wells leaves a coverage gap along the top of the riverbank between MW-2 and MW-4. The stormwater drainage map (Figure 9) indicates that stormwater runoff from basin "E" discharges over the riverbank in this location. A 10<sup>th</sup> monitoring well should be added along the top of the riverbank between MW-2 and MW-4 to fill in the coverage gap and to evaluate the effects of stormwater infiltrating in that area.
2. Section 5.2.1 of the work plan states that groundwater samples from the monitoring wells will initially be analyzed for all chemicals of interest. *"The analytical program for the remaining three monitoring events will be developed based on the results of the first groundwater monitoring event. Analytical suites . . . that are not detected or for which the constituent concentrations are below [levels of concern] will not be included in the quarterly monitoring analytical program for the remaining events."* One round of sampling is not a sufficient basis to support reducing the analytical testing suite. The work plan should anticipate analyzing all groundwater samples for all COIs for four quarters. DEQ may agree to reductions in the analytical testing suite in the third or fourth quarters if certain chemicals or classes of chemicals remain below levels of concern.
3. As noted by EPA, the vertical extent of contamination below the riverbank leave surface is a data gap that is not addressed in the current work plan. Depending on the outcome of the

Basis of Design Report, this data gap may need to be addressed in the future to design the riverbank source control measure.

4. DEQ recommends that an interim source control measure for the stormwater pathway be considered for the site. Construction of an interim source control measure, such as berms/curbs to eliminate off-site flows prior to redevelopment, would obviate much of the need for additional stormwater evaluation and analysis.

DEQ Section-Specific Comments:

1. Section 2.5.1. The last sentence of the *Preliminary Assessment – 1999 to 2002* section should reference Section 2.5.7 instead of Section 2.5.6.
2. Section 2.5.6. DEQ clarifies that, consistent with determinations at several other Portland Harbor sites, stormwater that is observed to “infiltrate into the bank” is considered discharge. As such, DEQ considers stormwater from sub-basins B, C, D and E to discharge over the bank, requiring control or further evaluation. Any discharges of stormwater off-site, even into adjacent treatment facilities, require control or further evaluation.
3. Section 3.2 Chemicals of Interest.
  - a. Please add semi-volatile organic compounds to the list of COIs.
  - b. Please provide a comprehensive list of all COIs for the site, which can include acknowledgement of those which apply only to specific pathways.
  - c. Please ensure that dioxins/furans are included as a COI for the stormwater pathway.
4. Section 3.4 of the work plan lists both a “stormwater discharge to the river” contaminant migration pathway and an “overland flow” pathway. These are effectively the same stormwater pathway. Please revise to one category of overland flow stormwater discharge.
5. Section 4.0. The extent of soil contamination exceeding Remedial Action Levels and/or Principal Threat Waste thresholds below the riverbank leave surface, and the potential presence of subsurface sources of contamination leaching to groundwater, are data gaps that should be noted in this section.
6. Section 4.1.2 should include an explanation of how riverbank areas with contaminants exceeding Remedial Action Levels/Principal Threat Waste thresholds from Table 21 of EPA’s 2017 Portland Harbor Record of Decision will be addressed in conformance with EPA’s River Bank Guidance.
7. Section 4.1.3. To clarify, notification to the State Historic Preservation Office should occur before field work is conducted, as described in Section 7.I.(2) of the Consent Order.
8. Section 4.2. The proposed groundwater monitoring wells are upgradient of the riverbank, leaving the riverbank soils leaching to groundwater pathway as a data gap. Consider angling some of the top of bank monitoring wells beneath the riverbank to address this data gap.
9. Section 4.3.3 should note that there are data gaps in the stormwater sampling data. In addition to the data gap for PCBs described in EPA’s comments, site stormwater samples were not analyzed for DDx or dioxins/furans, as shown on Table 13.
10. Section 5.1 Riverbank.
  - a. Given the heterogeneous nature of the soil contamination and the previous detections of dioxins/furans in riverbank samples, dioxins/furans should be added to the list of analytes for all soil samples to complete characterization of the eastern area of the upper riverbank and the launchable toe leave surface.

- b. The first paragraph at the top of Page 36 should describe the applicable sampling methodologies, rather than refer to a Sampling and Analysis Plan that is not included with the current work plan.
11. Section 5.3. In DEQ's experience at other sites in Portland Harbor, back-to-back storms late in the rainy season (Jan-Mar) also produced stormwater runoff and observable overland flow.
  12. The Willamette Cove and Cathedral Park Sediment Management Areas should be included on the riverbank transect figures (Figures 6, 7, 8, 10 & 11).
  13. Table 12. Portland Harbor Cleanup Levels and source control screening criteria should be referenced, rather than RBCs.
  14. Figure 12. Please include the proposed additional sampling locations on the cross-sections.
  15. Appendix C (*Groundwater Sampling and Analysis Plan*).
    - a. Modify to include the installation of 10 monitoring wells, and sampling and analysis for all groundwater COIs for four quarters.
    - b. Obtaining well start cards should be included in Section 3.1.
    - c. Portions of Section 3.3 are inconsistent with Oregon Water Resources Department rules (e.g., surging the wells prior to installation of the well seals). Please state that the wells will be installed per OWRD rules (Chapter 690, Division 240).
  16. Appendix D (*Health and Safety Plan*). The HASP should be signed on Page i.
  17. Appendix J is currently a second copy of the Evergreen Environmental Management report in Appendix I. Appendix J should be a copy of the 2016 *Focused Subsurface Investigation Report* from EVREN Northwest.

Overall, DEQ agrees with your plan to collect additional soil, groundwater, and stormwater samples at the site to fill in existing data gaps. Please address DEQ's and EPA's comments in a response to comments letter and prepare a final, signed and stamped work plan incorporating the comments. In accord with the Consent Order executed between Crawford Street Corporation, Steel Hammer Properties, and DEQ, please submit the final work plan within 30 days of the date of this letter, or by August 16, 2021. 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 [kevin.dana@deq.state.or.us](mailto:kevin.dana@deq.state.or.us).

Sincerely,



Kevin Dana, Project Manager  
Northwest Region Cleanup Program

cc: Mat Cusma, Schnitzer Steel Industries  
ECSI #2363 File