GeoEngineers

5820 S Kelly Avenue, Unit B
Portland, Oregon 97239
503.906.6567

October 15, 2021

Oregon Department of Environmental Quality (DEQ)
Northwest Region Office
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Attention: Kevin Dana, Cleanup Project Manager

Subject: Progress Report—Third Quarter 2021
Crawford Street South Site, Portland, Oregon
ECSI No. 2363
File No. 006209-010-01

This letter presents the quarterly progress report for the Crawford Street South site (ECSI # 2363) located in Portland Oregon. This letter is submitted in accordance with the Order on Consent ("Order") executed on March 8, 2021. This progress report includes the following for the third quarter of 2021:

- Updated Gantt Chart;
- Actions performed during this reporting period under the Order;
- Actions scheduled for the next reporting period;
- Summary of data generated; and
- Problems experienced and resolution.

UPDATED GANTT CHART

A copy of an updated Gantt chart is included as Attachment A; the Gantt chart has been updated to revise the project start date (i.e., DEQ approval of the Source Control Evaluation [SCE] Work Plan) from September 15, 2021 to October 15, 2021. Some of the other elements of the schedule were revised to reduce the amount of time to complete the task (e.g., well installations, pre-field preparation/coordination) to maintain the overall schedule.

THIRD QUARTER 2021 ACTIONS PERFORMED UNDER THE ORDER

- A Response to DEQ and EPA comments on the May 7, 2021 draft SCE Work Plan was submitted on August 16, 2021; transmitted the revised SCE Work Plan.
- Technical and project update meetings were held via MS Teams with DEQ on July 20, and August 9, 2021.

ACTIONS SCHEDULED FOR THE NEXT QUARTER

The following actions are anticipated for fourth quarter 2021:

- Conduct pre-field coordination and preparation activities for riverbank soil boring and groundwater well installation field work.
- Install, develop, and monitor 10 groundwater monitoring wells in accordance with the approved SCE Work Plan.
- Conduct riverbank soil sampling and chemical analysis in accordance with the approved SCE Work Plan.
- Tabulate and conduct a quality assurance/quality control (QA/QC) review of analytical data received from the laboratories in fourth quarter 2021.
- Submit a draft stormwater interim source control measures work plan (ISCMWP) consistent with the approved SCE Work Plan; respond to DEQ comments; and finalize the stormwater ISCMWP.

SAMPLING, TEST RESULTS, AND ANY OTHER DATA GENERATED DURING THE THIRD QUARTER 2021

- No data were generated during the reporting period.

PROBLEMS EXPERIENCED AND RESOLUTION

No problems were experienced during the reporting period.

If you have any questions regarding this progress report, please do not hesitate to contact me at 503.577.1535.

Sincerely,
GeoEngineers, Inc.

Amanda Spencer, PE, RG
Principal Hydrogeologist

AS:jm

cc: Mat Cusma, SSI
Tom Leaptrott, Steel Hammer Properties, LLC
Paul Seidel, DEQ NWR
Mark Pugh, DEQ NWR
Dave Lacey, DEQ NWR
Benjamin Leake, EPA

ATTACHMENT

Attachment A—Updated (10-5-2021) Gantt Chart

Disclaimer: Any electronic form, facsimile or hard copy of the original document (email, text, table, and/or figure), if provided, and any attachments are only a copy of the original document. The original document is stored by GeoEngineers, Inc. and will serve as the official document of record.

Crawford Street North - Schedule - October 2021

Task	Start Date	End Date	Days
Source Control Evaluation Work Plan			
Source Control Evaluation Work Plan Submitted to DEQ		**5/8/2021**	
DEQ Comments Received		7/16/2021	
Address Comments and Submit Final	7/16/2021	8/16/2021	***30***
DEQ Approval	8/16/2021	**10/15/2021**	60
RIVERBANK			
SCE Investigation and Reporting			
Contractor coordination and prepatory work	10/15/2021	10/30/2021	15
Complete field investigation	10/30/2021	11/14/2021	15
Laboratory Analysis	11/14/2021	12/29/2021	45
Prepare and submit Data Package	12/29/2021	1/28/2022	30
Work Plan Addendum (if needed) for final characterization data gaps	12/29/2021	1/28/2022	30
DEQ review Addendum	1/28/2022	2/12/2022	15
Address Comments and Submit Final Work Plan Addendum	2/12/2022	2/19/2022	7
DEQ Approval	2/19/2022	2/26/2022	7
Complete supplemental characterizations (if needed)	2/26/2022	3/28/2022	30
Riverbank SCMWP (Basis of Design Report)	**10/15/2021**	**7/12/2022**	**270**
Prepare and submit Draft SCMWP	10/15/2021	4/13/2022	***180***
DEQ review draft SCMWP and provide comments	4/13/2022	5/13/2022	30
Address Comments, Add in Data Gap Characterization Results, and Submit Final	5/13/2022	6/12/2022	***30***
DEQ Approval	6/12/2022	7/12/2022	30
Preliminary Riverbank Design Report (30% - 60%)	**7/12/2022**	**2/7/2023**	**210**
Conduct design studies identified in the SCMWP (if needed)	7/12/2022	11/9/2022	120
Prepare and submit Draft Preliminary Design Report	11/9/2022	1/8/2023	60
DEQ review and provide comments	1/8/2023	2/7/2023	30
Pre-Final Riverbank Design Report (90% - 95%)	**2/7/2023**	**4/8/2023**	**60**
Prepare and submit Draft Pre-Final Design Report	2/7/2023	3/9/2023	***30***
DEQ review and provide comments	3/9/2023	4/8/2023	30
Final Riverbank Design Report	**4/8/2023**	**6/7/2023**	**60**
Prepare and submit Draft Final Design Report	4/8/2023	5/8/2023	30
DEQ Approval	5/8/2023	6/7/2023	30
GROUNDWATER			
Groundwater SCE	**10/15/2021**	**9/14/2022**	
Contractor coordination and prepatory work	10/15/2021	11/19/2021	**35**
Install monitoring wells	11/19/2021	12/4/2021	15
Develop wells and conduct first round of sampling	12/4/2021	12/11/2021	7
Laboratory Analysis	12/11/2021	1/25/2022	45
Submit Data Package - results of first monitoring event	1/25/2022	2/24/2022	30
Conduct 2nd quarter monitoring event	3/11/2022	3/18/2022	7
Conduct 3rd quarter monitoring event	6/9/2022	6/16/2022	7
Conduct 4rth quarter monitoring event	9/7/2022	9/14/2022	7
Groundwater SCMWP	**9/14/2022**	**2/11/2023**	**150**
Prepare and submit Draft SCMWP	9/14/2022	11/28/2022	75
DEQ review draft SCMWP and provide comments	11/28/2022	12/28/2022	30
Address Comments and Submit Final	12/28/2022	1/27/2023	30
DEQ Approval	1/27/2023	2/11/2023	15
STORMWATER			
Stormwater Interim SCM Work Plan (ISCMWP)	**10/15/2021**	**1/13/2022**	**90**
Prepare and submit Draft ISCMWP	10/15/2021	11/14/2021	30
DEQ review draft ISCMWP and provide comments	11/14/2021	11/29/2021	15
Address Comments and Submit Final	11/29/2021	12/29/2021	30
DEQ Approval	12/29/2021	1/13/2022	15
Stormwater ISCM	**1/13/2022**	**9/10/2022**	**240**
Implement ISCM	1/13/2022	5/13/2022	120
Prepare Implementation Report	5/13/2022	6/27/2022	45
DEQ review draft Implementation Report and provide comments	6/27/2022	7/27/2022	30
Address Comments and Submit Final	7/27/2022	8/26/2022	30
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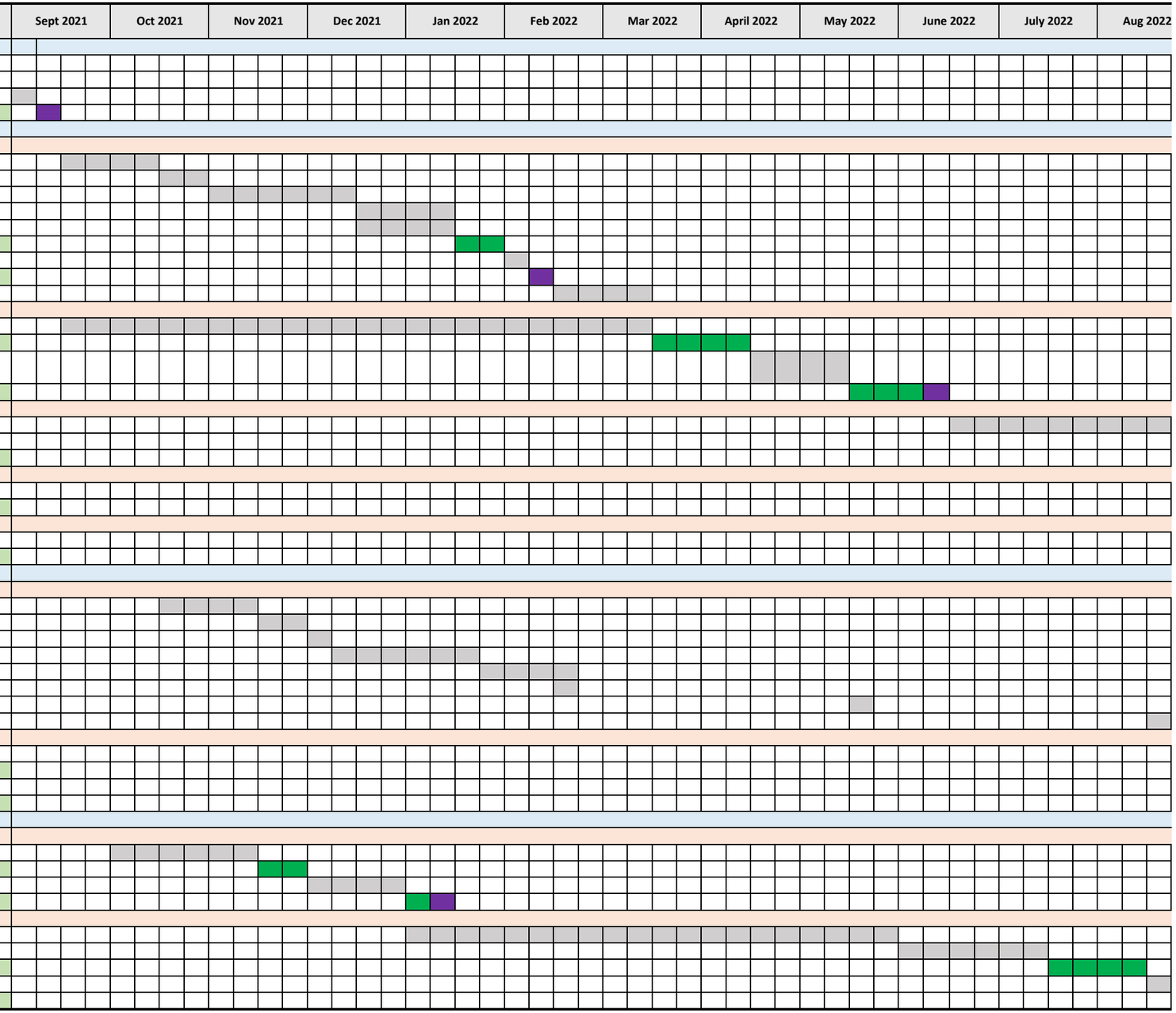

Notes:
(1) Number of days identified in bold italics are required by the ASAOC
(2) Number of days shaded in green are for DEQ commitments
(3) Green shading under calendar = DEQ action; gray shading under calendar = CSC action; purple shading = source control pathway milestone

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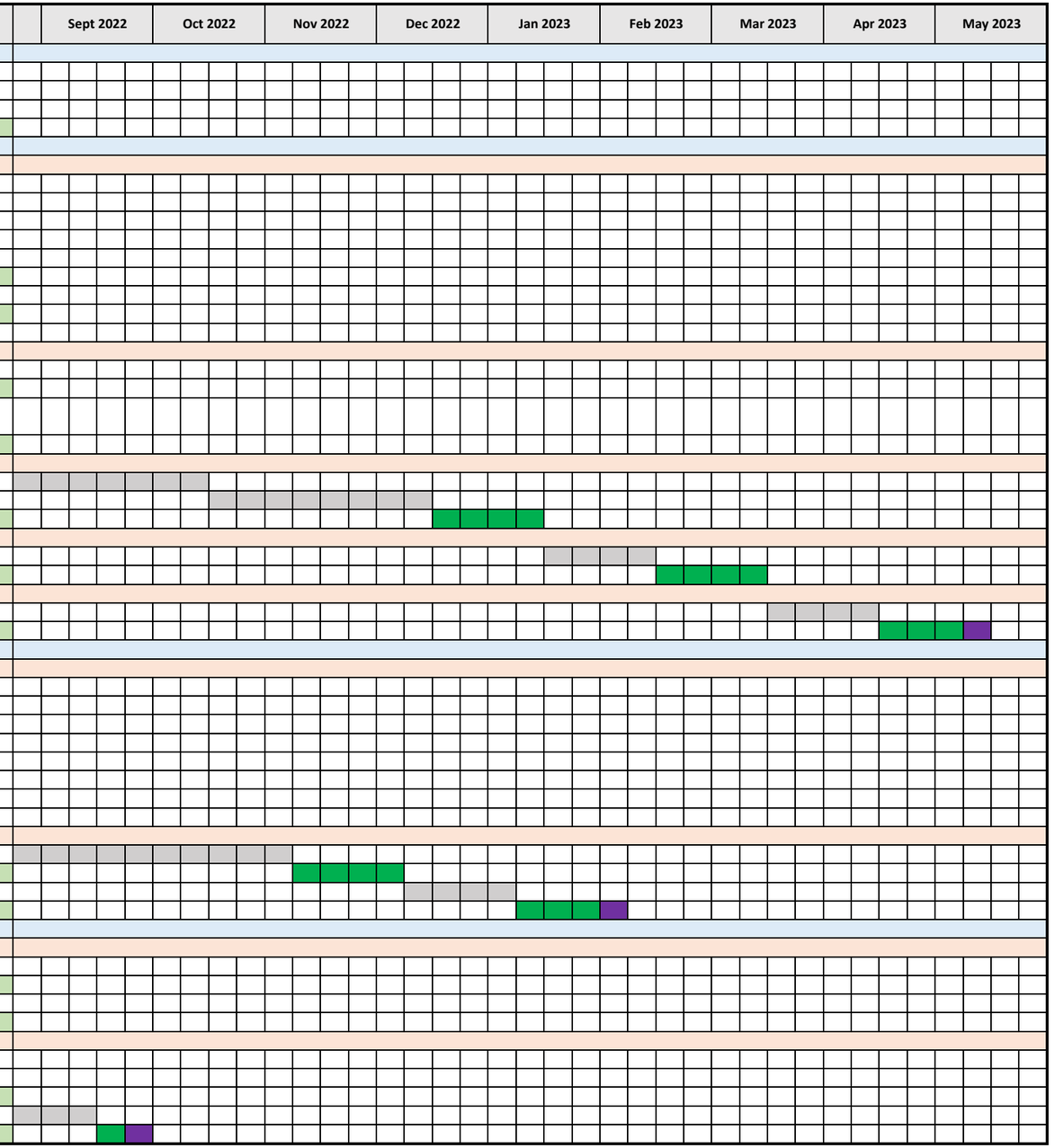

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