

January 6, 2022

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—Fourth Quarter 2021
Crawford Street South Site, Portland, Oregon
ECSI No. 2363
File No. 6209-010-01

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 fourth 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 incorporate the anticipated schedule for completing the Stormwater Interim Source Control Measure (Stormwater ISCM) as outlined in the December 2, 2021 Stormwater ISCM Work Plan. Additionally, due to inclement weather and contractor unavailability, well installations were not completed until mid-December and the first round of sampling was not completed until December 22, 2021; the previous schedule anticipated installation by December 4 and first round sampling by December 11, 2021. Additionally, analytical laboratories are reporting longer than typical turn-around times due to a significant amount of fieldwork conducted within Portland Harbor this fall. Therefore, we are anticipating submittal of the data package for the first groundwater monitoring event on March 15, 2022. This will not delay completion of the additional three quarters of monitoring, which will be conducted during the fourth weeks of March, June



and September, as initially proposed. We are anticipating submittal of the data package for the riverbank sampling and analysis by February 12, 2022.

FOURTH QUARTER 2021 ACTIONS PERFORMED UNDER THE ORDER

- Received approval of the August 16, 2021 revised SCE Work Plan from DEQ on October 15, 2021.
- Initiated pre-field coordination and preparation activities for riverbank soil boring and groundwater well installation fieldwork on October 18, 2021.
- Installed, developed and monitored 10 groundwater monitoring wells in accordance with the approved SCE Work Plan.
- Conducted riverbank soil sampling and chemical analysis in accordance with the approved SCE Work Plan.
- Retained a licensed surveyor to survey the 10 newly installed monitoring wells for lateral and vertical control.
- Prepared and submitted a draft interim stormwater source control measures work plan to DEQ on December 2, 2021 and received comments on and approval of the work plan from the DEQ on December 21, 2021.

ACTIONS SCHEDULED FOR THE NEXT QUARTER

The following actions are anticipated for first quarter 2022:

- Tabulate and conduct a quality assurance/quality control (QA/QC) review of analytical data received from the laboratories in fourth quarter 2021.
- Revise and finalize the interim stormwater source control measures work plan consistent with the DEQ comments and initiate implementation.
- Submit a data package with results of the riverbank sampling data and identify data gaps (if any) that require additional characterization prior to completing the Riverbank Basis of Design Report.
- Submit a data package with results of the first quarter of groundwater monitoring data.

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

The riverbank sampling and groundwater well installation and sampling were completed during the reporting period. Data packages with the analytical results from this work will be submitted during the first quarter of 2022.

PROBLEMS EXPERIENCED AND RESOLUTION

Heavy rainfall required specialty equipment and construction of gravel pads to access some of the top of riverbank monitoring well locations, leading to field delays in completing the activities. Contractor



unavailability led to additional delays in completing well installations, and analytical laboratories are currently running behind on typical turnaround times. However, the quarterly monitoring program will remain on track and data packages for first quarter groundwater monitoring event and the riverbank sampling will be submitted in first quarter 2022.

If you have any questions regarding this progress report, please do not hesitate to contact me at 503.1577.1535.

Sincerely,
GeoEngineers, Inc.



Amanda Spencer, PE, RG
Principal Hydrogeologist

AS:mce

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

Attachments:

Attachment A. Updated (1-5-2022) 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.



ATTACHMENTS

Crawford Street North - Schedule - January 2022

Task	Start Date	End Date	Days	Sept 2021	Oct 2021	Nov 2021	Dec 2021	Jan 2022	Feb 2022	Mar 2022	April 2022	May 2022	June 2022	July 2022	Aug 2022
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 preparatory work	10/15/2021	10/22/2021	7												
Complete field investigation	10/22/2021	11/18/2021	27												
Laboratory Analysis	11/18/2021	1/17/2022	60												
Prepare and submit Data Package	1/17/2022	2/16/2022	30												
Work Plan Addendum (if needed) for final characterization data gaps	1/17/2022	2/16/2022	30												
DEQ review Addendum	2/16/2022	3/3/2022	15												
Address Comments and Submit Final Work Plan Addendum	3/3/2022	3/10/2022	7												
DEQ Approval	3/10/2022	3/17/2022	7												
Complete supplemental characterizations (if needed)	3/17/2022	4/16/2022	30												
Riverbank SCMWP (Basis of Design Report)															
Prepare and submit Draft SCMWP	10/15/2021	5/3/2022	200												
DEQ review draft SCMWP and provide comments	5/3/2022	6/2/2022	30												
Address Comments, Add in Data Gap Characterization Results, and Submit Final	6/2/2022	7/2/2022	30												
DEQ Approval	7/2/2022	8/1/2022	30												
Preliminary Riverbank Design Report (30% - 60%)															
Conduct design studies identified in the SCMWP (if needed)	8/1/2022	11/29/2022	120												
Prepare and submit Draft Preliminary Design Report	11/29/2022	1/28/2023	60												
DEQ review and provide comments	1/28/2023	2/27/2023	30												
Pre-Final Riverbank Design Report (90% - 95%)															
Prepare and submit Draft Pre-Final Design Report	2/27/2023	3/29/2023	30												
DEQ review and provide comments	3/29/2023	4/28/2023	30												
Final Riverbank Design Report															
Prepare and submit Draft Final Design Report	4/28/2023	5/28/2023	30												
DEQ Approval	5/28/2023	6/27/2023	30												
GROUNDWATER															
Groundwater SCE															
Contractor coordination and preparatory work	10/15/2021	11/24/2021	40												
Install monitoring wells	11/24/2021	12/9/2021	15												
Develop wells and conduct first round of sampling	12/9/2021	12/24/2021	15												
Laboratory Analysis	12/24/2021	2/12/2022	50												
Submit Data Package - results of first monitoring event	2/12/2022	3/14/2022	30												
Conduct 2nd quarter monitoring event	3/24/2022	3/31/2022	7												
Conduct 3rd quarter monitoring event	6/22/2022	6/29/2022	7												
Conduct 4th quarter monitoring event	9/20/2022	9/27/2022	7												
Groundwater SCMWP															
Prepare and submit Draft SCMWP	9/27/2022	12/11/2022	75												
DEQ review draft SCMWP and provide comments	12/11/2022	1/10/2023	30												
Address Comments and Submit Final	1/10/2023	2/9/2023	30												
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STORMWATER															
Stormwater Interim SCM Work Plan (ISCMWP)															
Prepare and submit Draft ISCMWP	10/15/2021	12/14/2021	60												
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Stormwater ISCM															
Prepare design report	1/28/2022	5/28/2022	120												
DEQ Review of design report and approval	5/28/2022	7/27/2022	60												
Contracting and permitting	7/27/2022	1/23/2023	180												
Construction	1/23/2023	2/22/2023	30												
Completion Report	2/22/2023	3/24/2023	30												

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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