

April 15, 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—First Quarter 2022  
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 first quarter of 2022:

- 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 Basis of Design Report (BODR) for the Riverbank source control measure. GeoEngineers, on behalf of Crawford Street Corporation, requested an extension for completing the BODR due to the delays in receiving analytical data for the soil and groundwater investigations performed in November and December 2021. The original schedule had anticipated receiving data within 45 business days (6 weeks); however, final datasets were not received until 89 days from sample submittal, significantly delaying the progress on the BODR. The submittal date for the BODR has been moved to June 10, 2022 to accommodate for this delay. We have reduced the timeframe for completing design studies by one month to accommodate this schedule change so that the overall schedule for the design of the riverbank source control measure remains unchanged. We will revisit this schedule



during preparation of the BODR to further assess whether the expedited design process can be maintained. A request for approval of this schedule change has been submitted via email.

### **FIRST QUARTER 2022 ACTIONS PERFORMED UNDER THE ORDER**

- Revised the interim stormwater source control measures work plan consistent with DEQ comments provided in a December 21, 2021 letter and submitted a final work plan on January 14, 2022. The December 21, 2021 DEQ letter provided approval of the work plan conditioned on the requested revisions.
- Submitted a Soil Data Report on March 7, 2022 which included riverbank sampling data for the investigation conducted in November and December 2021.
- Submitted a Well Installation and Groundwater Monitoring Report on March 28, 2022, which described the methods, procedures and construction details for installing 10 wells at the Site and included the results of the first quarter of groundwater monitoring of the new wells.
- Conducted the second groundwater sampling event of the new wells during the week of March 21, 2022.

### **ACTIONS SCHEDULED FOR THE NEXT QUARTER**

The following actions are anticipated for second quarter 2022:

- Submit the design package for the interim stormwater source control measure.
- Submit the BODR for the riverbank source control measure.
- Submit the second groundwater monitoring event results and propose the analytical program for the remaining two sampling events to be completed for the groundwater source control evaluation.
- Complete the third groundwater sampling event.

### **SAMPLING, TEST RESULTS, AND ANY OTHER DATA GENERATED DURING THE REPORTING PERIOD**

The second groundwater monitoring event was completed during the reporting period. Data packages with the analytical results from this work will be submitted during the second quarter of 2022.

### **PROBLEMS EXPERIENCED AND RESOLUTION**

As detailed above, significant delays in receiving soil and groundwater data have delayed preparation of the BODR for the riverbank. However, it is currently anticipated that design studies can be expedited and the overall design schedule will stay on track.



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:tn

Attachments:  
Updated (4-1-22) Gantt Chart

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

One copy submitted electronically

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.



Task	Start Date	End Date	Days	Sept 2021	Mar 2022	April 2022	May 2022	June 2022	July 2022	Aug 2022	Sept 2022	Oct 2022	Nov 2022	Dec 2022	Jan 2023	Feb 2023	Mar 2023	Apr 2023	May 2023	June 2023	July 2023
<b>Source Control Evaluation Work Plan</b>																					
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																		
<b>RIVERBANK</b>																					
<b>SCE Investigation and Reporting</b>																					
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	2/15/2022	89																		
Prepare and submit Data Package	2/15/2022	3/7/2022	20																		
Riverbank SCMWP (Basis of Design Report)	3/7/2022	9/8/2022	185																		
Prepare and submit Draft BODR	3/7/2022	6/10/2022	95																		
DEQ review draft BODR and provide comments	6/10/2022	7/10/2022	30																		
Address Comments, Add In Data Gap Characterization Results, and Submit Final	7/10/2022	8/9/2022	30																		
DEQ Approval	8/9/2022	9/8/2022	30																		
<b>Preliminary Riverbank Design Report (30% - 60%)</b>																					
Conduct design studies identified in the SCMWP (if needed)	9/8/2022	1/6/2023	120																		
Prepare and submit Draft Preliminary Design Report	1/6/2023	3/7/2023	60																		
DEQ review and provide comments	3/7/2023	4/6/2023	30																		
<b>Pre-Final Riverbank Design Report (90% - 95%)</b>																					
Prepare and submit Draft Pre-Final Design Report	4/6/2023	5/6/2023	30																		
DEQ review and provide comments	5/6/2023	6/5/2023	30																		
<b>Final Riverbank Design Report</b>																					
Prepare and submit Draft Final Design Report	6/5/2023	8/4/2023	60																		
DEQ Approval	7/5/2023	8/4/2023	30																		
<b>GROUNDWATER</b>																					
<b>Groundwater SCE</b>																					
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	3/23/2022	89																		
Submit Data Package - results of first monitoring event	3/23/2022	3/28/2022	5																		
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																		
<b>Groundwater SCMWP</b>																					
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																		
DEQ Approval	2/9/2023	2/24/2023	15																		
<b>STORMWATER</b>																					
<b>Stormwater Interim SCM Work Plan (ISCMWP)</b>																					
Prepare and submit Draft ISCMWP	10/15/2021	12/14/2021	60																		
DEQ review draft ISCMWP and provide comments	12/14/2021	12/29/2021	15																		
Address Comments and Submit Final	12/29/2021	1/13/2022	15																		
DEQ Approval	1/13/2022	1/28/2022	15																		
<b>Stormwater ISCM</b>																					
Prepare design report	1/28/2022	3/28/2022	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  
 (4) yellow highlight = change since previous submittal of schedule.