

July 8, 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—Second 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 second 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 actual submittal dates for reports and data packages. No other changes were made to the schedule and no project delays affecting the schedule were encountered during the reporting period.

SECOND QUARTER 2022 ACTIONS PERFORMED UNDER THE ORDER

- Submitted a Groundwater Monitoring Report—Second Event on May 23, 2022 and received comments on recommendations presented in the report from the DEQ on June 14, 2022, which were incorporated into the scope of work for the third groundwater monitoring sampling event.



- Submitted the draft Interim Source Control Measures Design memorandum on May 26, 2022 and received comments on the memorandum from the DEQ on June 28, 2022.
- Submitted the draft Basis of Design Report (BODR) for the riverbank source control measure on June 10, 2022.
- Conducted the third groundwater sampling event during the week of June 27, 2022.

ACTIONS SCHEDULED FOR THE NEXT QUARTER

The following actions are anticipated for third quarter 2022:

- Revise the Interim Source Control Measures Design memorandum to address comments provided by DEQ and submit final memorandum.
- Initiate the pre-application and permitting process for implementing the interim stormwater source control measure.
- Submit a revised Additional Riverbank Soil Data report addressing DEQ comments received on April 21, 2022 and incorporating dioxin/furan data that GeoEngineers has been awaiting receipt from the analytical laboratory.
- Revise the BODR to address DEQ comments.
- Initiate the Riverbank Source Control Measure Design Studies upon DEQ approval of the revised BODR.
- Submit the third groundwater monitoring event results.
- Complete the fourth groundwater sampling event and initiate the groundwater source control measure report.

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

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

PROBLEMS EXPERIENCED AND RESOLUTION

No problems were experienced during the reporting period. Delayed dioxin/furan results from the riverbank soil sampling were received on June 27, 2022 and will be incorporated into a revised, final Riverbank Soil Data Package report.



If you have any questions regarding this progress report or the project in general, please do not hesitate to contact me at 503-577-1535 or aspencer@geoengineers.com.

Sincerely,
GeoEngineers, Inc.



Amanda Spencer, PE, RG
Principal Hydrogeologist

AS:tlh

Attachments:
Updated (7-1-22) 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.



Crawford Street South - Schedule - July 1, 2022

Task	Start Date	End Date	Days	Sept 2021	Mar 2022	April 2022	May 2022	June 2022	July 2022	Aug 2022	Sept 2022	Oct 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	2/15/2022	89									
Prepare and submit Riverbank Soil Data Package	2/15/2022	3/7/2022	20									
Receive DEQ comments on the Riverbank Soil Data Package	3/7/2022	4/21/2022	45									
Address comments, incorporate delayed D/F data and finalize Riverbank Soil Data Package	4/21/2022	7/15/2022	85									
Riverbank SCMWP (Basis of Design Report)												
Prepare and submit Draft BODR	3/7/2022	6/10/2022	95									
DEQ review draft BODR and provide comments	6/10/2022	7/25/2022	45									
Address Comments and Submit Final	7/25/2022	8/24/2022	30									
DEQ Approval	8/24/2022	9/23/2022	30									
Preliminary Riverbank Design Report (30% - 60%)												
Conduct design studies identified in the SCMWP	9/23/2022	1/21/2023	120									
Prepare and submit Draft Preliminary Design Report	1/21/2023	3/22/2023	60									
DEQ review and provide comments	3/22/2023	4/21/2023	30									
Pre-Final Riverbank Design Report (90% - 95%)												
Prepare and submit Draft Pre-Final Design Report	4/21/2023	6/20/2023	60									
DEQ review and provide comments	5/21/2023	6/20/2023	30									
Final Riverbank Design Report												
Prepare and submit Draft Final Design Report	6/20/2023	7/20/2023	30									
DEQ Approval	7/20/2023	8/19/2023	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	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	6/26/2022	6/30/2022	4									
Conduct 4th quarter monitoring event	9/24/2022	9/30/2022	6									
Groundwater SCMWP												
Prepare and submit Draft SCMWP	9/30/2022	12/14/2022	75									
DEQ review draft SCMWP and provide comments	12/14/2022	1/13/2023	30									
Address Comments and Submit Final	1/13/2023	2/12/2023	30									
DEQ Approval	2/12/2023	2/27/2023	15									
STORMWATER												
Stormwater Interim SCM Work Plan (ISCMWP)												
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									
Stormwater ISCM												
Prepare design report	1/28/2022	5/26/2022	118									
DEQ Review of design report and approval	5/26/2022	6/28/2022	33									
Contracting and permitting	6/28/2022	12/25/2022	180									
Construction	12/25/2022	1/24/2023	30									
Completion Report	1/24/2023	2/23/2023	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 = significant change since previous submittal of schedule.

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