

October 5, 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—Third 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 third 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 submittal dates for reports and data packages that have been submitted and approval dates for those submittals that have received approval.

The draft riverbank Basis of Design Report was submitted on June 10, 2022. Comments from the EPA and DEQ are pending, however, based on a telecommunication with DEQ on September 29, 2022, comments are anticipated by mid-October 2022. Therefore, the Gantt chart has been updated to reflect anticipated receipt of comments on October 14, 2022.

Approval of the Interim Stormwater Source Control Measure Design report was received on September 29, 2022 and the Gantt chart was updated with this approval date.



No other modifications to the schedule were needed.

SECOND QUARTER 2022 ACTIONS PERFORMED UNDER THE ORDER

- Submitted the Second Quarter 2022 progress report and updated Gantt Chart on July 8, 2022.
- Submitted a revised Additional Riverbank Soil Data report on July 8, which addressed DEQ comments received on April 21, 2022 and incorporated dioxin/furan data that GeoEngineers has been awaiting receipt from the analytical laboratory.
- Revised the Interim Stormwater Source Control Measures Design memorandum to address comments provided by DEQ on June 28, 2022 and submitted the final memorandum for approval on July 20, 2022. Final approval was received from DEQ on September 29, 2022.
- Received comments prepared by the Five Tribes on the draft riverbank Basis of Design Report (BODR) which were provided by the DEQ on August 29, 2022; comments from EPA are pending.
- Conducted the fourth groundwater sampling event on September 7 and 8, 2022.

ACTIONS SCHEDULED FOR THE NEXT QUARTER

The following actions are anticipated for third quarter 2022:

- Initiate implementing the interim stormwater source control measure consistent with the final Interim Stormwater Source Control Measures Design Report.
- Revise the BODR to address DEQ comments.
- Initiate the riverbank Source Control Measure design studies upon DEQ approval of the revised BODR.
- Initiate the groundwater source control measure report upon receipt of analytical data from the fourth groundwater monitoring event.

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

The fourth groundwater monitoring event was completed during the reporting period. The final analytical data set from the third event (conducted week of June 27, 2022) was received on September 28, 2022. The third and fourth groundwater event data sets will be submitted in the groundwater source control measure report.

PROBLEMS EXPERIENCED AND RESOLUTION

Due to the significant volume of investigative work currently being conducted in the Portland Harbor Superfund Site, analytical laboratories are experiencing unprecedented delays in completing their analyses. Analysis of groundwater samples from the third event were submitted during the last week of June 2022 and the final pesticide and PCB congener data was just received on September 28, 2022. Data packages with the analytical results from the third event will be combined with the fourth event and provided in the



groundwater source control measure report, which is anticipated to be submitted during the fourth quarter of 2022 (assuming more timely receipt of laboratory data for the fourth event).

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:cdb

Attachments:
Updated (10-1-22) 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 - October 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	10/14/2022	126									
Address Comments and Submit Final	10/14/2022	11/13/2022	30									
DEQ Approval	11/13/2022	12/13/2022	30									
Preliminary Riverbank Design Report (30% - 60%)												
Conduct design studies identified in the SCMWP	12/13/2022	4/12/2023	120									
Prepare and submit Draft Preliminary Design Report	4/12/2023	6/11/2023	60									
DEQ review and provide comments	6/11/2023	7/11/2023	30									
Pre-Final Riverbank Design Report (90% - 95%)												
Prepare and submit Draft Pre-Final Design Report	7/11/2023	8/10/2023	30									
DEQ review and provide comments	8/10/2023	9/9/2023	30									
Final Riverbank Design Report												
Prepare and submit Draft Final Design Report	9/9/2023	11/8/2023	60									
DEQ Approval	10/9/2023	11/8/2023	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	9/29/2022	126									
Contracting and permitting	9/29/2022	3/28/2023	180									
Construction	3/28/2023	4/27/2023	30									
Completion Report	4/27/2023	5/27/2023	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.

Crawford Street South - Schedule - October 1, 2022

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Source Control Evaluation Work Plan												
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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)	3/7/2022	12/13/2022	281									
Prepare and submit Draft BODR	3/7/2022	6/10/2022	95									
DEQ review draft BODR and provide comments	6/10/2022	10/14/2022	126									
Address Comments and Submit Final	10/14/2022	11/13/2022	30									
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Preliminary Riverbank Design Report (30% - 60%)	12/13/2022	7/11/2023	210									
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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	9/30/2022	2/27/2023	150									
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									
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DEQ Approval	1/13/2022	1/28/2022	15									
Stormwater ISCM	1/28/2022	5/27/2023	484									
Prepare design report	1/28/2022	5/26/2022	118									
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Contracting and permitting	9/29/2022	3/28/2023	180									
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