

January 10, 2023

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 2022
Crawford Street South Site, Portland, Oregon
ECSI No. 2363
File No. 6209-010-02

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 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.

No other modifications to the schedule were needed.



FOURTH QUARTER 2022 ACTIONS PERFORMED UNDER THE ORDER

- Submitted the third quarter 2022 progress report on October 5, 2022.
- Initiated the permitting process for the interim stormwater source control measure consistent with the final Interim Stormwater Source Control Measures Design Report.
- Submitted a final Basis of Design Report (BODR) on November 17, 2022. The final BODR included revisions to address comments prepared by U.S. Environmental Protection Agency (EPA) and forwarded by DEQ to GeoEngineers on October 17, 2022. DEQ approved the final BODR on December 14, 2022.
- Submitted a draft groundwater source control evaluation report on December 16, 2022.

ACTIONS SCHEDULED FOR THE NEXT QUARTER

The following actions are anticipated for first quarter 2023:

- Continue the permitting process for the interim stormwater source control measure consistent with the final Interim Stormwater Source Control Measures Design Report.
- Conduct the riverbank Source Control Measure design studies identified in the final BODR.
- Receive and address DEQ comments on the draft groundwater source control measure report and submit a revised report as needed.

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

No testing or analytical data was 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 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:atk



Attachments:
Updated (1-1-23) 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 - January 1, 2023

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
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													
Add delayed lab package and Finalize Riverbank Soil Data Package	4/21/2022	7/15/2022	85													
Riverbank SCMWP (Basis of Design Report)	3/8/2022	12/14/2022	281													
Prepare and submit Draft BODR	3/8/2022	6/11/2022	95													
DEQ review draft BODR and provide comments	6/11/2022	10/18/2022	129													
Address Comments and Submit Final	10/18/2022	11/17/2022	30													
DEQ Approval	11/17/2022	12/14/2022	27													
Preliminary Riverbank Design Report (30% - 60%)	12/14/2022	7/13/2023	211													
Conduct design studies identified in the SCMWP	12/15/2022	4/14/2023	120													
Prepare and submit Draft Preliminary Design Report	4/14/2023	6/13/2023	60													
DEQ review and provide comments	6/13/2023	7/13/2023	30													
Pre-Final Riverbank Design Report (90% - 95%)	7/13/2023	9/12/2023	61													
Prepare and submit Draft Pre-Final Design Report	7/14/2023	8/13/2023	30													
DEQ review and provide comments	8/13/2023	9/12/2023	30													
Final Riverbank Design Report	9/12/2023	11/12/2023	61													
Prepare and submit Draft Final Design Report	9/13/2023	10/13/2023	30													
DEQ Approval	10/13/2023	11/12/2023	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	9/30/2022	3/19/2023	170													
Prepare and submit Draft SCMWP	10/1/2022	12/16/2022	76													
DEQ review draft SCMWP and provide comments	12/17/2022	1/17/2023	31													
Address Comments and Submit Final	1/18/2023	2/17/2023	30													
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STORMWATER																
Stormwater Interim SCM Work Plan (ISCMWP)																
Prepare and submit Draft ISCMWP	10/15/2021	12/14/2021	60													
DEQ review draft ISCMWP and provide comments	12/14/2021	12/29/2021	15													
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Stormwater ISCM	1/28/2022	5/27/2023	484													
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.
 - (4) yellow highlight = significant change since previous submittal of schedule.

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