

October 13, 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—Third Quarter 2023
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 No. 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 2023:

- 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. Additionally, the property is currently in negotiations with a potential purchaser who would redevelop the site for alternative use. This development would require installation and management of stormwater; therefore, the implementation of the interim stormwater management plan has been placed on hold pending completion of the sale. The Gantt chart identifies that this will be revisited next year. We have also extended the timeframe for receipt of DEQ comments on the Preliminary Design Report for the riverbank source control measure to the end of October 2023 and added in a line item to meet with DEQ and resolve the comments prior to preparing the Pre-Final Design Report.



THIRD QUARTER 2023 ACTIONS PERFORMED UNDER THE ORDER

- Submitted the second quarter 2023 progress report on July 12, 2023.

ACTIONS SCHEDULED FOR THE NEXT QUARTER

The following actions are anticipated for fourth quarter 2023:

- Review and address DEQ comments on the Preliminary Design Report for the riverbank source control measure.
- Conduct a groundwater monitoring event in November 2023.
- Submit a final Groundwater Pathway Source Control Evaluation report.

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

No testing or analytical data were 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;jm

Attachment:
Updated (10-1-23) Crawford Street South Schedule—Gantt Chart

cc:
Mat Cusma, SSI (pdf)
Tom Leaptrott, Steel Hammer Properties, LLC (pdf)
Erin McDonnell, DEQ NWR (pdf)
Dave Lacey, DEQ NWR (pdf)
Laura Hanna, 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, 2023

Task	Start Date	End Date	Days	Sept 2021	Mar 2022	April 2022	May 2022	June 2022	July 2022	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23
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	10/31/2023	321													
Conduct design studies identified in the SCMWP	12/15/2022	4/14/2023	120													
Prepare and submit Draft Preliminary Design Report	4/14/2023	6/16/2023	63													
DEQ review and provide comments	6/16/2023	10/31/2023	137													
Pre-Final Riverbank Design Report (90% - 95%)	10/31/2023	3/15/2024	136													
Address and Resolve Regulatory Comments on Preliminary Design	11/1/2023	12/16/2023	45													
Prepare and submit Draft Pre-Final Design Report	12/16/2023	2/14/2024	60													
DEQ review and provide comments	2/14/2024	3/15/2024	30													
Final Riverbank Design Report	3/15/2024	5/15/2024	61													
Prepare and submit Draft Final Design Report	3/16/2024	4/15/2024	30													
DEQ Approval	4/15/2024	5/15/2024	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	12/30/2023	456													
Prepare and submit Draft SCMWP	10/1/2022	12/16/2022	76													
DEQ review draft SCMWP and provide comments	12/17/2022	3/31/2023	104													
Address Comments and Submit Final	4/1/2023	11/30/2023	30													
DEQ Approval	11/30/2023	12/30/2023	30													
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	1/28/2022	7/25/2024	909													
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 - identify plans for future property development	9/29/2022	3/12/2024	530													
Construction of interim plan if property purchase will not be completed in 2024	3/12/2024	6/10/2024	90													
Completion Report	6/10/2024	7/25/2024	45													

- 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 indicates revised element; orange highlight is a tentative date identified for when we will revisit this work scope.

Crawford Street South Schedule—October 1, 2023

Task	Start Date	End Date	Days	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	23-Oct	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-23	May-23
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	10/31/2023	321															
Conduct design studies identified in the SCMWP	12/15/2022	4/14/2023	120															
Prepare and submit Draft Preliminary Design Report	4/14/2023	6/16/2023	63															
DEQ review and provide comments	6/16/2023	10/31/2023	137															
Pre-Final Riverbank Design Report (90% - 95%)	10/31/2023	3/15/2024	136															
Address and Resolve Regulatory Comments on Preliminary Design	11/1/2023	12/16/2023	45															
Prepare and submit Draft Pre-Final Design Report	12/16/2023	2/14/2024	60															
DEQ review and provide comments	2/14/2024	3/15/2024	30															
Final Riverbank Design Report	3/15/2024	5/15/2024	61															
Prepare and submit Draft Final Design Report	3/16/2024	4/15/2024	30															
DEQ Approval	4/15/2024	5/15/2024	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	12/30/2023	456															
Prepare and submit Draft SCMWP	10/1/2022	12/16/2022	76															
DEQ review draft SCMWP and provide comments	12/17/2022	3/31/2023	104															
Address Comments and Submit Final	4/1/2023	11/30/2023	30															
DEQ Approval	11/30/2023	12/30/2023	30															
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	1/28/2022	7/25/2024	909															
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 - identify plans for future property development	9/29/2022	3/12/2024	530															
Construction of interim plan if property purchase will not be completed in 2024	3/12/2024	6/10/2024	90															
Completion Report	6/10/2024	7/25/2024	45															

- 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 indicates revised element; orange highlight is a tentative date identified for when we will revisit this work scope.