

January 12, 2024

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 2023
Crawford Street South Site, Portland, Oregon
ECSI No. 2363
File No. 6209-010-03

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 fourth 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 Gantt chart has been revised to include performing additional design studies (e.g., seepage study; additional groundwater monitoring), submitting a 60% Riverbank Design document, and completing the consultation process associated with obtaining permitting for the project by the U.S. Army Corps of Engineers (USACE) per discussions held in the meeting with you and EPA representatives to discuss and resolve the comments on the 30% Riverbank Design Report.

FOURTH QUARTER 2023 ACTIONS PERFORMED UNDER THE ORDER

- Submitted the third quarter 2023 progress report on October 12, 2023.



- Submitted a letter response to DEQ, EPA, and tribal comments on the 30% Riverbank Design Report on November 29, 2023.
- Conducted a groundwater monitoring event in December 2023.
- Coordinated and participated in a meeting with DEQ and EPA on December 19, 2023 to resolve comments on the 30% Design Report.

ACTIONS SCHEDULED FOR THE NEXT QUARTER

The following actions are anticipated for first quarter 2024:

- Submit a letter proposing a revised document submittal schedule for DEQ review and written approval in accordance with the Order.
- Submit a work plan for conducting a seepage study to support the 60% Riverbank Source Control Measures (RBSCM) Design.
- Submit groundwater data report for the December 2023 groundwater monitoring report.

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

A groundwater monitoring event was conducted in December 2023; analytical data is anticipated in January 2024 and will be submitted in first quarter 2024.

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—January 1, 2024

Task	Start Date	End Date	Days	Aug-23	Sep-23	23-Oct	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	1-Aug	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25
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%)	12/14/2022	11/29/2023	350																				
Conduct design studies identified in the SCMWP	12/15/2022	4/14/2023	120																				
Prepare and submit Draft Preliminary Design Report	4/14/2023	6/15/2023	62																				
DEQ review and provide comments	6/15/2023	10/30/2023	137																				
Respond to DEQ and EPA comments	10/30/2023	11/29/2023	30																				
Revised Preliminary Riverbank Design Report (60%)	1/1/2024	9/29/2024	272																				
Conduct design studies identified in Response to 30% RD Comments	1/1/2024	6/1/2024	152																				
Prepare and submit 60% Design Report	6/1/2024	7/31/2024	60																				
DEQ review and provide comments	7/31/2024	9/29/2024	60																				
Pre-Final Riverbank Design Report (90% - 95%)	9/29/2024	3/28/2025	180																				
Address and Resolve Regulatory Comments on 60% Design	9/29/2024	11/28/2024	60																				
Complete USACE permitting consultation process	11/29/2023	11/28/2024	365																				
Prepare and submit Draft Pre-Final Design Report	11/28/2024	2/26/2025	90																				
DEQ review and provide comments	2/26/2025	3/28/2025	30																				
Final Riverbank Design Report	3/28/2025	7/11/2025	105																				
Address and Resolve Regulatory Comments on 90% Design	3/28/2025	5/12/2025	45																				
Prepare and submit Draft Final Design Report	5/12/2025	6/11/2025	30																				
DEQ Approval	6/11/2025	7/11/2025	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	8/15/2024	685																				
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																				
Respond to Comments	3/31/2023	4/30/2023	30																				
Submit Final	5/1/2023	7/16/2024	442																				
DEQ Approval	7/16/2024	8/15/2024	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																				
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Stormwater ISCM	1/28/2022	4/11/2025	1169																				
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 development planning not initiated in 2024	3/12/2024	2/25/2025	350																				
Completion Report	2/25/2025	4/11/2025	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.

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