

July 9, 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—Second Quarter 2024
Crawford Street South Site, Portland, Oregon
ECSI No. 2363
File No. 6209-010-04

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 second quarter of 2024:

- 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.



SECOND QUARTER 2024 ACTIONS PERFORMED UNDER THE ORDER

- Submitted the first quarter 2024 progress report on April 9, 2024.
- Conducted a meeting with DEQ on April 29, 2024 to discuss proposed revisions to the riverbank layback design being contemplated to address comments from the Kaizen meeting held in January 2024 in support of the USACE permitting process and to identify additional work that will be needed to support the revised design. Provided a meeting summary via email to the DEQ team on April 30, 2024.
- Submitted an Addendum to the Groundwater Source Control Evaluation Report (Report) on May 9, 2024.
- Submitted a 2024 Leave Surface Sampling and Analysis Plan (2024 LSSAP) for conducting additional characterization needed to support 60% RBSCM Design for the revised riverbank layback.

ACTIONS SCHEDULED FOR THE NEXT QUARTER

The following actions are anticipated for second quarter 2024:

- Implement the 2024 LSSAP upon DEQ approval.
- Continued interactions with the USACE or supporting agencies to progress the permitting process for the riverbank layback.
- Continue preparation of 60% RBSCM Design based on the results of the 2024 LSSAP.
- Respond to comments from the DEQ and EPA on the Addendum to the Groundwater Source Control Evaluation Report.

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

No data were generated during this 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:jm

ATTACHMENT:

Updated (7-1-24) 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—July 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	2/24/2025	420																				
Conduct design studies in Response to 30% RD Comments	1/1/2024	10/27/2024	300																				
Prepare and submit 60% Design Report	10/27/2024	12/26/2024	60																				
DEQ review and provide comments	12/26/2024	2/24/2025	60																				
Pre-Final Riverbank Design Report (90% - 95%)	2/24/2025	4/1/2025	36																				
Address and Resolve Regulatory Comments on 60% Design	2/24/2025	4/25/2025	60																				
Complete USACE permitting consultation process	1/17/2024	1/16/2025	365																				
Prepare and submit Draft Pre-Final Design Report	1/16/2025	3/2/2025	45																				
DEQ review and provide comments	3/2/2025	4/1/2025	30																				
Final Riverbank Design Report	4/1/2025	7/15/2025	105																				
Address and Resolve Regulatory Comments on 90% Design	4/1/2025	5/16/2025	45																				
Prepare and submit Draft Final Design Report	5/16/2025	6/15/2025	30																				
DEQ Approval	6/15/2025	7/15/2025	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																				
Conduct 5th monitoring event	12/1/2023	12/3/2023																					
Groundwater SCE Report	9/30/2022	8/7/2024	677																				
Prepare and submit SCE Report	10/1/2022	12/16/2022	76																				
DEQ review GWSCE Report and provide comments	12/17/2022	3/31/2023	104																				
Respond to Comments	3/31/2023	4/30/2023	30																				
Submit Addendum to GWSCE addressing comments	5/1/2023	5/9/2024	374																				
DEQ Review of Addendum	5/9/2024	8/7/2024	90																				
Revise Addendum	8/7/2024	10/6/2024	60																				
DEQ Approval	10/6/2024	11/5/2024	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																				
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	1/30/2026	1463																				
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	12/31/2024	824																				
Construction of interim plan if property development planning not initiated in 2024	12/31/2024	12/16/2025	350																				
Completion Report	12/16/2025	1/30/2026	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.

Crawford Street South Schedule—July 1, 2024

Task	Start Date	End Date	Days	Apr-25	May-25	Jun-25	Jul-25	Aug-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	2/24/2025	420					
Conduct design studies in Response to 30% RD Comments	1/1/2024	10/27/2024	300					
Prepare and submit 60% Design Report	10/27/2024	12/26/2024	60					
DEQ review and provide comments	12/26/2024	2/24/2025	60					
Pre-Final Riverbank Design Report (90% - 95%)	2/24/2025	4/1/2025	36					
Address and Resolve Regulatory Comments on 60% Design	2/24/2025	4/25/2025	60					
Complete USACE permitting consultation process	1/17/2024	1/16/2025	365					
Prepare and submit Draft Pre-Final Design Report	1/16/2025	3/2/2025	45					
DEQ review and provide comments	3/2/2025	4/1/2025	30					
Final Riverbank Design Report	4/1/2025	7/15/2025	105					
Address and Resolve Regulatory Comments on 90% Design	4/1/2025	5/16/2025	45					
Prepare and submit Draft Final Design Report	5/16/2025	6/15/2025	30					
DEQ Approval	6/15/2025	7/15/2025	30					
GROUNDWATER								
Groundwater SCE	10/15/2021	9/30/2022						
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					
Conduct 5th monitoring event	12/1/2023	12/3/2023						
Groundwater SCE Report	9/30/2022	8/7/2024	677					
Prepare and submit SCE Report	10/1/2022	12/16/2022	76					
DEQ review GWSCE Report and provide comments	12/17/2022	3/31/2023	104					
Respond to Comments	3/31/2023	4/30/2023	30					
Submit Addendum to GWSCE addressing comments	5/1/2023	5/9/2024	374					
DEQ Review of Addendum	5/9/2024	8/7/2024	90					
Revise Addendum	8/7/2024	10/6/2024	60					
DEQ Approval	10/6/2024	11/5/2024	30					
STORMWATER								
Stormwater Interim SCM Work Plan (ISCMWP)	10/15/2021	1/28/2022	105					
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	1/30/2026	1463					
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	12/31/2024	824					
Construction of interim plan if property development planning not initiated in 2024	12/31/2024	12/16/2025	350					
Completion Report	12/16/2025	1/30/2026	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.