

October 15, 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—Third 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 third quarter 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.



### **THIRD QUARTER 2024 ACTIONS PERFORMED UNDER THE ORDER**

- Submitted the second quarter 2024 progress report on July 9, 2024.
- Received approval of the draft May 2024 Addendum to the Groundwater Source Control Evaluation Report (Addendum) on July 31, 2024, with a request to finalize the Addendum and respond to comments from DEQ, EPA, and Yakama Nation provided in the July 31, 2024 letter.
- Provided a response to the July 31, 2024 comments and submitted a final Addendum on August 27, 2024.
- Received conditional approval for and comments on the draft 2024 Leave Surface Sampling and Analysis Plan (2024 LSSAP) from DEQ and EPA on July 31, 2024.
- Provided a response to comments and submitted a revised 2024 LSSAP on August 12, 2024.

### **ACTIONS SCHEDULED FOR THE NEXT QUARTER**

The following actions are anticipated for fourth quarter 2024:

- Complete the 2024 LSSAP.
- Continue interactions with the US Army Corps of Engineers (USACE) or supporting agencies to progress the permitting process for the riverbank layback.
- Continue preparation of the 60% RBCSM Design based on the results of the 2024 LSSAP.

### **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](mailto:aspencer@geoengineers.com).

Sincerely,

GeoEngineers, Inc.



Amanda Spencer, PE, RG  
Principal Hydrogeologist

AS:jm

**ATTACHMENT:**

Updated (10-1-24) Crawford Street South Schedule—Gantt Chart

cc:

Mat Cusma, SSI (pdf)  
Tom Leaptrott, Steel Hammer Properties, LLC (pdf)  
Erin McDonnell, DEQ NWR (pdf)  
Ken Theissen, 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, 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
<b>Source Control Evaluation Work Plan</b>																							
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																				
<b>RIVERBANK</b>																							
<b>SCE Investigation and Reporting</b>																							
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																				
<b>Riverbank SCMWP (Basis of Design Report)</b>	<b>3/8/2022</b>	<b>12/14/2022</b>	<b>281</b>																				
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																				
<b>Preliminary Riverbank Design Report (30%)</b>	<b>12/14/2022</b>	<b>11/29/2023</b>	<b>350</b>																				
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																				
<b>Revised Preliminary Riverbank Design Report (60%)</b>	<b>1/1/2024</b>	<b>5/5/2025</b>	<b>490</b>																				
Conduct design studies in Response to 30% RD Comments	1/1/2024	1/5/2025	370																				
Prepare and submit 60% Design Report	1/5/2025	3/6/2025	60																				
DEQ review and provide comments	3/6/2025	5/5/2025	60																				
<b>Pre-Final Riverbank Design Report (90% - 95%)</b>	<b>5/5/2025</b>	<b>10/8/2025</b>	<b>156</b>																				
Address and Resolve Regulatory Comments on 60% Design	5/5/2025	7/4/2025	60																				
Complete USACE permitting consultation process	1/17/2024	7/25/2025	555																				
Prepare and submit Draft Pre-Final Design Report	7/25/2025	9/8/2025	45																				
DEQ review and provide comments	9/8/2025	10/8/2025	30																				
<b>Final Riverbank Design Report</b>	<b>10/8/2025</b>	<b>1/21/2026</b>	<b>105</b>																				
Address and Resolve Regulatory Comments on 90% Design	10/8/2025	11/22/2025	45																				
Prepare and submit Draft Final Design Report	11/22/2025	12/22/2025	30																				
DEQ Approval	12/22/2025	1/21/2026	30																				
<b>GROUNDWATER</b>																							
<b>Groundwater SCE</b>																							
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																					
<b>Groundwater SCE Report</b>	<b>9/30/2022</b>	<b>7/31/2024</b>	<b>670</b>																				
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 and Approval	5/9/2024	7/31/2024	83																				
Finalize Addendum	7/31/2024	8/27/2024	27																				
<b>STORMWATER</b>																							
<b>Stormwater Interim SCM Work Plan (ISCMWP)</b>																							
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																				
<b>Stormwater ISCM</b>	<b>1/28/2022</b>	<b>1/30/2026</b>	<b>1463</b>																				
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 ASAO.
  - (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, 2024

Task	Start Date	End Date	Days	Apr-25	May-25	Jun-25	Jul-25	Aug-25
<b>Source Control Evaluation Work Plan</b>								
Source Control Evaluation Work Plan Submitted to DEQ		<b>5/8/2021</b>						
DEQ Comments Received		7/16/2021						
Address Comments and Submit Final	7/16/2021	8/16/2021	<b>30</b>					
DEQ Approval	8/16/2021	<b>10/15/2021</b>	<b>60</b>					
<b>RIVERBANK</b>								
<b>SCE Investigation and Reporting</b>								
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					
<b>Riverbank SCMWP (Basis of Design Report)</b>								
Prepare and submit Draft BODR	3/8/2022	6/11/2022	<b>95</b>					
DEQ review draft BODR and provide comments	6/11/2022	10/18/2022	<b>129</b>					
Address Comments and Submit Final	10/18/2022	11/17/2022	<b>30</b>					
DEQ Approval	11/17/2022	<b>12/14/2022</b>	<b>27</b>					
<b>Preliminary Riverbank Design Report (30%)</b>								
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	<b>137</b>					
Respond to DEQ and EPA comments	10/30/2023	11/29/2023	30					
<b>Revised Preliminary Riverbank Design Report (60%)</b>								
Conduct design studies in Response to 30% RD Comments	1/1/2024	1/5/2025	370					
Prepare and submit 60% Design Report	1/5/2025	3/6/2025	60					
DEQ review and provide comments	3/6/2025	5/5/2025	<b>60</b>					
<b>Pre-Final Riverbank Design Report (90% - 95%)</b>								
Address and Resolve Regulatory Comments on 60% Design	5/5/2025	7/4/2025	60					
Complete USACE permitting consultation process	1/17/2024	7/25/2025	555					
Prepare and submit Draft Pre-Final Design Report	7/25/2025	9/8/2025	45					
DEQ review and provide comments	9/8/2025	10/8/2025	<b>30</b>					
<b>Final Riverbank Design Report</b>								
Address and Resolve Regulatory Comments on 90% Design	10/8/2025	11/22/2025	45					
Prepare and submit Draft Final Design Report	11/22/2025	12/22/2025	<b>30</b>					
DEQ Approval	12/22/2025	1/21/2026	<b>30</b>					
<b>GROUNDWATER</b>								
<b>Groundwater SCE</b>								
Contractor coordination and preparatory work	10/15/2021	11/24/2021	<b>40</b>					
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						
<b>Groundwater SCE Report</b>								
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	<b>104</b>					
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 and Approval	5/9/2024	7/31/2024	<b>83</b>					
Finalize Addendum	7/31/2024	8/27/2024	<b>27</b>					
<b>STORMWATER</b>								
<b>Stormwater Interim SCM Work Plan (ISCMWP)</b>								
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	<b>15</b>					
Address Comments and Submit Final	12/29/2021	1/13/2022	15					
DEQ Approval	1/13/2022	1/28/2022	<b>15</b>					
<b>Stormwater ISCM</b>								
Prepare design report	1/28/2022	5/26/2022	118					
DEQ Review of design report and approval	5/26/2022	9/29/2022	<b>126</b>					
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 ASAO.
  - (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.