

January 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—Fourth 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 fourth 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.

We completed the 2024 Leave Surface Sampling and Analysis Plan (LSSAP) field investigation in October 2024, but the receipt of laboratory analytical results has been significantly delayed, as noted in our December 16, 2024 email to you. As of December 16, 2024, we had anticipated receipt of the full data package by the end of 2024. However, as of the date of this report, we have not received the pesticide data and the laboratory is now estimating the end of January 2025. Therefore, we have updated the Gantt chart assuming that we will receive the full data package by the end of January 2025 and will submit a brief 2024 LSSAP results report by the end of February 2025. Consistent with the December 16, 2024 email,



we will submit a removal action work plan by end of April 2025; the removal action work plan will outline the scope, methods, and procedures to remove sediment from the beach area of the Site that contains chemicals of concern (COCs) at concentrations above Portland Harbor Superfund Site (PHSS) remedial action levels (RALs) or principal threat waste (PTW) levels. However, the delay in receipt of the laboratory data will require a push back of the submittal of the 60% Riverbank Source Control Measure (RBSCM) Design Report by one month to the end of May 2025. The attached Gantt chart has been updated to reflect these schedule changes.

FOURTH QUARTER 2024 ACTIONS PERFORMED UNDER THE ORDER

- Submitted the third quarter 2024 progress report on October 15, 2024.
- Completed the 2024 LSSAP field investigation in October 2024.
- Received an email dated October 28, 2024 from DEQ approving a change in the 2024 LSSAP to analyze the 2 to 3 foot depth interval sediment samples instead of the 3 to 4 foot interval to support an anticipated removal action approach for the beach area sediments. As noted in the email exchange, sediment samples were collected and archived from the 3 to 4 foot and 4 to 5 foot intervals for possible future analysis as needed.
- Submitted an email to DEQ on December 16, 2024 to provide an update on the status of receipt of the 2024 LSSAP analytical results and a proposed reporting schedule; received approval of the reporting schedule via email from DEQ on December 17, 2024.

ACTIONS SCHEDULED FOR THE NEXT QUARTER

The following actions are anticipated for first quarter 2025:

- Submit a brief 2024 LSSAP results report by February 28, 2025 (assuming receipt of the full analytical data package by January 31, 2025).
- Initiate preparation of a Removal Action Work Plan.
- 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% RBSCM Design based on the results of the 2024 LSSAP.

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

The 2024 LSSAP analytical data package is in preparation by the analytical laboratory and will be submitted as a part of a 2024 LSSAP Results Report in first quarter 2025.

PROBLEMS EXPERIENCED AND RESOLUTION

The delay in receipt of the 2024 LSSAP analytical data has caused a delay in the reporting schedule for the project but has been resolved as identified in the Updated Gantt Chart section above.



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 (1-1-25) 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—January 1, 2025

Task	Start Date	End Date	Days	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	5/31/2025	516															
Conduct design studies in Response to 30% RD Comments	1/1/2024	2/28/2025	424															
Prepare Removal Action Work Plan	2/28/2025	4/30/2025	61															
DEQ Review Removal Action Work Plan	4/30/2025	5/30/2025	30															
Respond to Comments and Finalize Work Plan	5/30/2025	6/29/2025	30															
DEQ Approval of Removal Action Work Plan	6/29/2025	7/14/2025	15															
Conduct Removal Action	7/14/2025	10/12/2025	90															
Prepare and submit 60% Design Report	4/30/2025	5/31/2025	31															
DEQ review and provide comments	5/31/2025	7/30/2025	60															
Pre-Final Riverbank Design Report (90% - 95%)	5/31/2025	1/30/2026	244															
Address and Resolve Regulatory Comments on 60% Design	7/30/2025	9/28/2025	60															
Complete USACE permitting consultation process	1/17/2024	11/17/2025	670															
Prepare and submit Draft Pre-Final Design Report	11/17/2025	12/31/2025	44															
DEQ review and provide comments	12/31/2025	1/30/2026	30															
Final Riverbank Design Report	1/30/2026	4/30/2026	90															
Address and Resolve Regulatory Comments on 90% Design	1/30/2026	3/16/2026	45															
Prepare and submit Draft Final Design Report	3/16/2026	4/15/2026	30															
DEQ Approval	4/15/2026	4/30/2026	15															
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	7/31/2024	670															
Prepare and submit SCE Report	10/1/2022	12/16/2022	76															
DEQ review GWSC Report and provide comments	12/17/2022	3/31/2023	104															
Respond to Comments	3/31/2023	4/30/2023	30															
Submit Addendum to GWSC 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															
STORMWATER																		
Stormwater Interim SCM Work Plan (ISCMWP)																		
Prepare and submit Draft ISCMWP	10/15/2021	12/14/2021	60															
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Stormwater ISCM	1/28/2022	2/14/2026	1478															
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	12/31/2025	365															
Completion Report	12/31/2025	2/14/2026	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;
 yellow shading indicates a new task or activity since the previous quarterly report.

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