




**REGION 10**  
SEATTLE, WA 98101

April 2, 2025

**MEMORANDUM**

**SUBJECT:** Comments on the 2024 Leave Surface Sampling and Analysis Plan (LSSAP) Data Submittal  
Crawford Street South Site, Portland, Oregon  
ECSI # 2363  
February 28, 2025

**FROM:** Laura Hanna, RG, Remedial Project Manager   
Superfund and Emergency Management Division, EPA

**TO:** Kevin Dana, Project Manager  
NWR Cleanup, Oregon Department of Environmental Quality

The following are the U.S. Environmental Protection Agency's (EPA's) comments on the document titled *2024 LSSAP Data Submittal (Report)*. The Report was prepared by GeoEngineers for Crawford Street South (Site). The Site is located at 8524 North Crawford Street in Portland, Oregon and listed as Environmental Cleanup Site Information (ECSI) #2363. The Site is located on the eastern side of Willamette River upland of the Willamette Cove and Cathedral Park remedial design project areas within the Portland Harbor Superfund Site (PHSS). The Report focuses on the soil and bank erosion upland source contaminant transport pathways.

EPA's comments are categorized as "To Be Considered," which, if addressed or resolved, would reduce uncertainty, improve confidence in the document's conclusions, and/or best support the objectives; and "Matters of Style," which substantially or adversely affect the presentation of the technical information provided in the report.

**To Be Considered Comments**

1. **Incorporation of available adjacent data:** PCBs and PAHs have been identified in riverbank soils on the adjacent Willamette Cove property, approximately 60 to 65 feet from transect XS13 (WC Group, 2024). EPA recommends incorporating proximal data from the Willamette Cove (WC Group, 2024) and Cathedral Park Project Areas (CDM Smith 2023). The Willamette Cove data suggests potential for contamination along XS13, particularly between offset ~100 and 130 feet.

Incorporating proximal data from the Willamette Cove and Cathedral Park Project Areas will further illustrate the nature of contamination along the riverbank.

**2. Section 3.1 Scope of 2024 LSSAP, pages 4 to 5:** EPA has the following comments on this section:

- a. Revise the text in the third bullet point to clarify what is meant by “2-foot samples”. EPA understands there were not 2-foot intervals collected based on Table 2 and discussion throughout the Report. The sample intervals presented are either half foot or one-foot intervals.
- b. Revise the text to detail why all analytes were not consistently tested for a sample, such as dioxins/furans not being analyzed at XS4-OHW.

**Matters of Style**

**1. Figures 4 through 7:** EPA has the following comments on this set of figures:

- a. EPA suggests adding the in-water Cathedral Park and Willamette Cove Project Area boundaries to this set of figures.
- b. Add the black dot sample locations symbol to the legends.

**References**

EPA. 2017. Record of Decision. Portland Harbor Superfund Site. Portland, Oregon. January.

Willamette Cove In-Water Remedial Design Group (WC Group). 2024. *Willamette Cove Supplemental Pre-Design Investigation Evaluation Report*. July.

CDM Smith. 2023. *Final Pre-Design Investigation Evaluation Report. Cathedral Park and Fund-Lead Project Areas 3, 7, 9, and 10*. March. <https://semspub.epa.gov/work/10/100446387.pdf>

cc: David Lacey, DEQ  
Josie Clark, EPA  
Eva DeMaria, EPA  
Katie Young, CDM Smith