REGION 10
SEATTLE, WA 98101

June 17, 2025

MEMORANDUM

SUBJECT: Comments on the Removal Action Work Plan
Crawford Street South Site, Portland, Oregon
ECSI # 2363
May 5, 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 *Removal Action Work Plan* (RAWP). The RAWP was prepared by GeoEngineers, Inc for Crawford Street Corporation. The Crawford Street Corporation site is located at 8524 North Crawford Street in Portland, Oregon and listed as Environmental Cleanup Site Information (ECSI) #2363. The site is located adjacent to the Willamette River upland of the Willamette Cove and Cathedral Park remedial design project areas within the Portland Harbor Superfund Site (PHSS). The RAWP focuses on the riverbank upland source contaminant transport pathway.

EPA understands the primary objectives of the RAWP is to support the 60% riverbank design currently being prepared for the riverbanks at the Crawford Street Corporation site. EPA's comments are categorized as "Primary," which identify concerns that must be resolved to achieve the objective; "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.

Primary Comments

1. **Section 4.1 Scope of the Pre-Removal Investigation, pages 10-11:** XS-11 has a 1,2,3,7,8-pentachlorodibenzo-p-dioxin (PeCDD) exceedance above PHSS remedial action level (RAL) in the 6-7 foot below ground surface interval (Table 5) and is neither bounded vertically or laterally. EPA

recommends including additional sampling around this location or provide the rationale for not further delineating the PeCDD contamination in this area.

2. **Figures**: Include the estimated proposed areas of excavation on Figures 4 through 7. Including the proposed excavation areas would evaluate the adequacy of the proposed work described in the RAWP.

3. **Incorporation of available adjacent data:** Polychlorinated biphenyls (PCBs) and polycyclic aromatic hydrocarbons (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). Incorporating proximal data from the Willamette Cove and Cathedral Park Project Areas will further illustrate the nature of contamination along the riverbank and support adequate delineation.

To Be Considered

1. **Section 2.4 Black Sand Removal Action, page 7, bullet point 1:** Confirm that 0.05 mg/kg was the correct detection limit for PCBs. The PHSS cleanup level for total PCBs is 9 µg/kg, and a detection limit of 0.05 mg/kg (50 ug/kg) is a high detection limit for PCBs.

Matters of Style

1. **Table 6:** Add notes to the end of Table 6. Not including notes for the table impacts the reader's interpretation of the data, such as not knowing what the bold and highlighted colors signify.

2. **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. Including the in-water boundaries will help clarify SMA responsibility and if the proximal data is included, as requested in Primary Comment 3, will also clarify from which in-water group the data has come from.

    b. Add the black dot sample locations symbol to the legends which is currently missing on Figures 5 and 6.

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
Jason Silvertooth, CDM Smith