

July 14, 2025

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 2025
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 2025:

- 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. No changes were made to the schedule since the First Quarter 2025 progress report.

SECOND QUARTER 2025 ACTIONS PERFORMED UNDER THE ORDER

- Submitted the First quarter 2025 progress report on April 17, 2025.
- Submitted a Removal Action Work Plan (RAWP) to address constituents of concern (COC) in beach sediments on May 5, 2025.



- Submitted the Intermediate (60%) Design Report for the Riverbank Source Control Measure (RBCSM) on June 21, 2025.

ACTIONS SCHEDULED FOR THE NEXT QUARTER

The following actions are anticipated for third quarter 2025:

- Respond to DEQ and EPA comments on the RAWP and submit a final work plan.
- Initiate the pre-removal investigations and prepare a data summary report with the results.
- Apply for necessary permits and coordinate subcontractors to complete the removal action located at mean high water between transects XS2 and XS3 as described in the RAWP.
- Initiate removal action (this action may need to be completed in October 2025 if permits cannot be obtained in sufficient time to complete the removal action during the third quarter).

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

No additional data was generated in second quarter 2025.


PROBLEMS EXPERIENCED AND RESOLUTION

No problems were experienced which required resolution.

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 (7-1-25) 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—July 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	6/21/2025	537															
Conduct design studies in Response to 30% RD Comments	1/1/2024	2/28/2025	424															
Prepare Removal Action Work Plan	2/28/2025	5/5/2025	66															
DEQ Review Removal Action Work Plan	5/5/2025	6/18/2025	44															
Respond to Comments and Finalize Work Plan	6/18/2025	7/18/2025	30															
DEQ Approval of Removal Action Work Plan	6/18/2025	6/18/2025	0															
Conduct Pre-Removal Action Investigatins and Removal at MHW XS2/XS3	6/18/2025	10/30/2025	134															
Prepare and submit 60% Design Report	5/5/2025	6/21/2025	47															
DEQ review and provide comments	6/21/2025	8/20/2025	60															
Pre-Final Riverbank Design Report (90% - 95%)	6/21/2025	1/31/2026	224															
Address and Resolve Regulatory Comments on60% Design	8/20/2025	11/18/2025	90															
Complete USACE permitting consultation process	1/17/2024	1/21/2025	370															
Prepare and submit Draft Pre-Final Design Report	11/18/2025	1/1/2026	44															
DEQ review and provide comments	1/1/2026	1/31/2026	30															
Final Riverbank Design Report	1/31/2026	5/1/2026	90															
Address and Resolve Regulatory Comments on 90% Design	1/31/2026	3/17/2026	45															
Prepare and submit Draft Final Design Report	3/17/2026	4/16/2026	30															
DEQ Approval	4/16/2026	5/1/2026	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 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															
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	8/29/2026	1674															
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 completed in 2025	4/16/2026	7/15/2026	90															
Completion Report	7/15/2026	8/29/2026	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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