




REGION 10
SEATTLE, WA 98101

August 12, 2025

MEMORANDUM

SUBJECT: Comments on the Intermediate (60%) Design Report Riverbank Source Control Measure
Crawford Street South Site, Portland, Oregon
ECSI # 2363
June 20, 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 *Intermediate (60%) Design Report Riverbank Source Control Measure* (60% Design Report). The 60% Design Report 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).

EPA's review of the 60% Design Report focused on responsiveness to EPA comments on the June 2023 *Preliminary (30%) Design Report Riverbank Source Control Measure* and on the updates to the riverbank design approach. EPA's comments are categorized as "Primary," which identify concerns that must be resolved to achieve the objective.

Primary Comments

1. **Integration of Full Riverbank Design:** Future design reports should integrate the design for the full riverbank area. This 60% Design Report focuses on the portion of the riverbank between ordinary high water (OHW) and top of bank, and notes that a separate removal action will be conducted in the area between ordinary low water (OLW) and OHW. A comprehensive riverbank approach and design should be presented in future design reports, including the proposed removal between OLW and OHW and the design presented in this 60% Design Report for the area

above OHW. This will allow for a more complete assessment of the riverbank remedial approach at the Crawford Street site.

2. **Geotechnical Data and Evaluations:** In EPA comment 4f (EPA 2022) on the 30% design, concerns were raised about the liquefied condition slope stability factor of safety being below the minimum. EPA appreciates Crawford's response to comment suggesting further discussions with the EPA and agrees both parties should convene a meeting. EPA recommends including results of these conversations in subsequent design deliverables.

References

EPA. 2022. *Preliminary (30%) Design Report Riverbank Source Control Measure Crawford Street Site, Portland, OR*. Memorandum from EPA to Oregon Department of Environmental Quality.

cc: David Lacey, DEQ
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