



Via electronic delivery

May 28, 2026

Anne Christopher, Remedial Project Manager
U.S. EPA Region 10 Oregon Operations Office
805 SW Broadway, Suite 500 MS:OOO
Portland, Oregon 97205

Re: McCormick & Baxter Site
RD/RA Coop. Agreement V- 99060104 -0
Performance Report
October 1, 2025 through March 31, 2026

Anne:

This Performance Report for the McCormick & Baxter Creosoting Company NPL site (M&B) submittal is required under Cooperative Agreement number V-99060104, between the U.S. Environmental Protection Agency (EPA) and the Oregon Department of Environmental Quality (DEQ).

This Performance Report describes Operational and Functional (O&F) activities conducted from October 1, 2025 through March 31, 2026 in accordance with the Cooperative Agreement Work Plan.

Explanation of work accomplished during the reporting period, delays, or other problems, if any, and a description of corrective measures that are planned.

Work activities described in the Cooperative Agreement Work Plan and completed by DEQ during this reporting period include:

- General Project Management and Administrative Activities:
 - Oversight of all tasks implemented by DEQ and its contractors
 - Project and Contract Management of Task Orders/Amendments issued to DEQ contractors, to include monthly cost tracking and invoice processing
 - Review and approval of all deliverables prepared by DEQ contractor
- Tracking progress toward major milestones and budgets, and preparation of status reports to EPA

- Calendar year 2025 barrier wall performance assessment: production of figures, hydrographs, and tables from 2025 monitoring well transducer data collected from paired wells inside and outside the barrier wall, and from low tide manual groundwater elevation monitoring/ NAPL gauging data collected from all site monitoring wells in 2025.
- Five Year Review Monitoring: Groundwater activities include site wide groundwater sampling, infiltration pond monitoring well sampling (59s) and Hazardous Waste disposal.
- The 2024 Annual O&M Report was issued in January 2026.
- Annual Operation and Maintenance (O&M) Report preparation. The Annual O&M Report presents the status of all site remedies and calendar year 2025 activities conducted. The 2025 Annual O&M Report will be submitted to EPA upon completion.
- Site visits/inspections and quarterly meetings with DEQ and the DEQ contractor in December 2025 and March 2026.

DEQ performed following complementary activities outside of the O&F CA Work Plan which protects the M&B Groundwater Operable Unit.

- Recording an Easement and Equitable Servitude for the upland property on December 24, 2025, which includes groundwater use restrictions.
- Drafting an Easement and Equitable Servitude for the Burlington Northern Santa Fe Railroad right of way, which will restrict groundwater use. DEQ will provide EPA a copy upon completion.

Comparison of the percentage of the project completed to the project schedule, and an explanation of significant discrepancies.

Activities funded through the Cooperative Agreement Work Plan are documented in a Task Order Contract issued by DEQ to the DEQ contractor in June 2025. Completed Task Order Contract activities are presented above.

On December 17, 2025, EPA issued an Operational and Functional Determination for the Groundwater Operable Unit at McCormick & Baxter Superfund Site. A Joint State/EPA Final inspection was conducted on March 17, 2026.

The *Interim Remedial Action Report: Final Groundwater Operable Unit (OU#3) McCormick & Baxter Creosoting Company* was prepared in September 2003. During discussions in winter 2025, EPA requested that DEQ fund and prepare an updated Groundwater Operable Unit (OU#3) Remedial Action Report to document groundwater activities since the issuance of the 2003 Interim Remedial Action Report.

DEQ understands from discussions in 2025 that EPA would consider DEQ's costs associated with preparing the updated M&B Groundwater Operable Unit (OU#3) Remedial Action Report

as Operational and Functional match credit. DEQ will track costs to prepare the report for potential use as future match credit for another Superfund Site located in Oregon.

Estimate of the time and funds needed to complete the work required in the Cooperative Agreement, a comparison of that estimate to the time and funds remaining, and justification for any increase.

On September 28, 2017, EPA issued Cooperative Agreement number V- 99060104-0. EPA releases funds in annual increments. EPA awarded the supplemental funding of \$112,675 on April 14, 2025 with a project period end date of December 31, 2025. To date, EPA agrees to cost-share 92.17% of all approved budget period costs.

EPA issued a Cooperative Agreement (V-99060104-C) on January 6, 2026 to extend the project period to June 30, 2026. This no-cost extension allows EPA and DEQ to begin reconciliation of the Cooperative Agreement match requirements.

The table below represents an estimate of expenditures and contractual encumbrances between October 1, 2025 through March 31, 2026 and a total federal funds budget summary through March 31, 2026.

McCormick and Baxter CA Budget

Federal Funding Received	FY26 10/1/25- 3/31/26	FY17-26 Total
EPA funds received	\$0	\$0
Previous Balance	\$15,729	\$572,834
Total	\$15,729	\$572,834
Expenditures		
DEQ Personnel	\$1,181	\$73,414
Services and Supplies (Contractual & misc. S&S)	\$26,816	\$467,497
Indirect Cost	\$292	\$16,481
Total Expenditure	\$28,290	\$557,392
Encumbrances (contract obligations under Task Order)	\$0	\$0
Total with Encumbrances	\$28,290	\$557,392
Balance	\$15,441	\$15,441
Correction amount ¹	\$15,441	\$15,441
Ending Balance	\$0	\$0

¹ Analysis error correction, ending balance actuals are at \$0, final balance will occur during reconciliation

DEQ will continue to perform Cooperative Agreement Closeout tasks including preparing the final progress report which will discuss Cooperative Agreement tasks from September 28, 2017 through March 31, 2026. DEQ will work with EPA to perform financial closeout requirements and reconciliation.

Please let me know if you have questions on this report or require additional information.

A handwritten signature in blue ink that reads "Sarah Miller".

Sarah Miller

Project Manager
NWR Cleanup Program
Oregon Department of Environmental Quality

C: Kevin Parrett, DEQ
 Alexander Bautista, DEQ
 Dani Johnson, DEQ
 Rick Ernst, GSI