



REGION 10

SEATTLE, WA 98101

February 26, 2026

MEMORANDUM

SUBJECT: Comments on the Pre-Removal Action Investigation Report and Downstream Investigation Work Plan
Crawford Street South Site, Portland, Oregon
ECSI # 2363
January 19, 2026

FROM: Laura Hanna, RG, Remedial Project Manager *Laura Hanna*
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 Pre-Removal Action Investigation Report and Downstream Investigation Work Plan (Pre-RA Report and WP). The Pre-RA Report and WP was prepared by GeoEngineers, Inc. (GeoEngineers) for the Crawford Street Corporation and Steel Hammer Properties LLC (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 along the Willamette River upland of the Cathedral Park (CP) and Willamette Cove (WC) remedial design project areas within the Portland Harbor Superfund Site (PHSS). The Pre-RA Report and WP focuses on the results of a beach sediment investigation that was performed to complete the scope of work outlined in the Removal Action Work Plan (Geoengineers 2025) and includes a work plan for additional sampling of beach sediment.

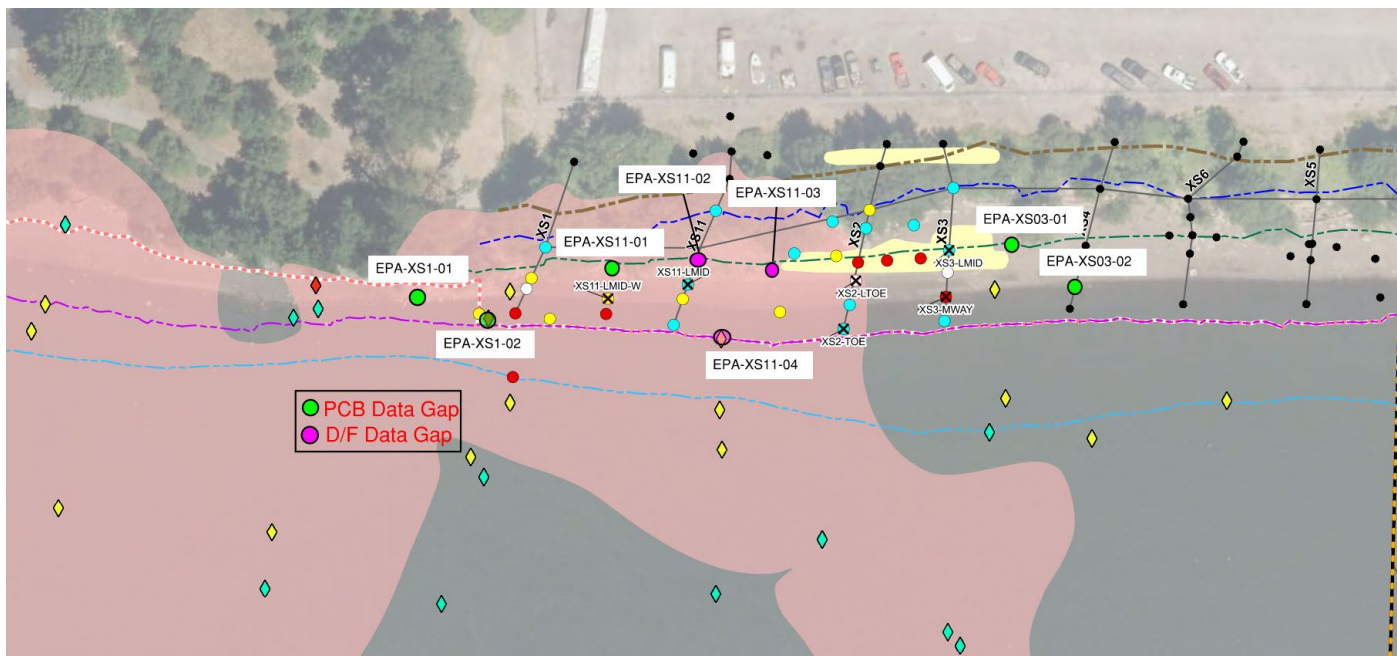
EPA's comments are categorized as "Primary," which identify concerns that must be resolved to achieve the objective and "To Be Considered," which, if addressed or resolved, would reduce uncertainty, improve confidence in the document's conclusions, and/or best support the objectives.

Primary Comments

1. **Section 1.0 Introduction, page 1:** EPA is awaiting the collection of additional data and completion of the Crawford Street remedial design before determining whether the downstream area will be included within the Cathedral Park Project Area. Accordingly, the downstream area is not

included in the current Cathedral Park 60% remedial design. Revise the last sentence of the second paragraph to state that the scope of work is to collect the additional data needed to complete the 100% design for the downstream area and to support potential integration with adjacent remedial actions at Cathedral Park.

2. **Section 3.2 Scope and Procedures of October 2025 Phase of the Pre-Removal Action Investigation, page 6 and Section 7.0 Work Plan for Additional Downstream Definition of PCBs and PECDD/TCDD, page 10:** At this time, EPA has not made a determination regarding inclusion of this downstream area, and any such decision is contingent on the evaluation of additional data and remedial design. Revise statements regarding EPA’s willingness to include the downstream beach sediment as part of the Cathedral Park Project Area to state the scope of work for additional data is to inform potential integration with adjacent remedial actions.
3. **Section 7.0 Work Plan for Additional Downstream Definition of PCBs and PeCDD/TCDD, page 11:** The first paragraph on page 12 references the reoccupation of XS2-LMID. However, XS2-LMID is not one of the six locations identified for reoccupation in Figure 8. Revise the text or figure so the correct sample locations are identified.
4. **Section 7.0 Work Plan for Additional Downstream Definition of PCBs and PeCDD/TCDD, General:** To address existing data gaps and characterize the horizontal and vertical extent of PCB and Dioxin/Furan contamination between the Ordinary Low Water (OLW) elevation (7.2’ NAVD88) and Mean High Water (MHW) elevation (13’ NAVD88) within the Crawford Street Project Area, EPA proposes collection of additional sediment/riverbank samples during Crawford Street’s Downstream Investigation as presented on the following figure:



The sampling intervals for the proposed additional samples and/or archiving samples are presented on the table below:

EPA Proposed Sample	Proposed Depth (ft)	Proposed Sampling Intervals (1-ft intervals)	Sample Scope
EPA-XS1-01	10	0 to 10	Laterally delineate the extent of deeper PCB Exceedances at XS1-TOE-W
EPA-XS1-02	10	4 to 10	Revisit XS1-TOE-W to Delineate DOC at XS1-TOE-W and XS1-TOE
EPA-XS11-01	10	0 to 10	Delineate DOC at MHW boundary
EPA-XS11-02	10	0 to 10	Delineate DOC at MHW boundary
EPA-XS11-03	10	0 to 10	Delineate DOC at MHW boundary
EPA-XS11-04	10	0 to 10	Delineate DOC at RB-27 since XS11-LTOE is not being revisited
EPA-XS03-01	5	0 to 5	Lateral and Vertical delineation of PCB exceedance at SC-143a towards MHW
EPA-XS3-02	5	0 to 5	Lateral and Vertical delineation of PCB exceedance at SC-143a towards XS 4

5. Section 7.0 Work Plan for Additional Downstream Definition of PCBs and PeCDD/TCDD,

General: EPA proposes the additional sampling intervals to address data gaps and characterize the horizontal and vertical extent of PCB and Dioxin/Furan contamination between the OLW and MHW. EPA is amenable to samples being archived for future analysis, if needed.

Crawford Proposed Sample	Proposed Depth (ft)	Crawford St Proposed Sampling Intervals (1-ft intervals)	EPA Proposed Additional Sample Intervals (1-ft intervals)
XS11-LMID-W	10	6 to 10	5-6
XS11-LMID	10	7 to 10	-
XS2-TOE	8 to 10	2 to 10	0-1, 1-2
XS2-LMID	8 to 10	3 to 8	0-1, 1-2
XS3-MWAY	10	2 to 10	1-2
XS3-LMID	2	1 to 2	0-1, 2-3, 3-4, 4-5

To Be Considered

1. **Section 6.0 Conclusions and Recommendations and 7.0 Work Plan for Additional Downstream Definition of PCBs and PECDD/TCDD:** The report would benefit from a dedicated subsection summarizing residual uncertainties (e.g., depth limits, QA/QC qualifiers) and how proposed additional borings resolve them, rather than dispersing those statements across Sections 5-7.
2. **Section 7.0 Work Plan for Additional Downstream Definition of PCBs and PeCDD/TCDD, Sample XS2-LMID:** Its not clear why XS11-LIMD was selected instead of XS11-LTOE which contained the PeCDD exceedance from 6 to 7 feet. Consider relocating XS11-LMID to XS11-LTOE to directly bound the PeCDD exceedance from 6 to 7 feet bgs.

References

GeoEngineers, 2025. Removal Action Work Plan. Crawford Street South Site, Portland, Oregon. July 17, 2025.

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