

April 11, 2024

Ms. Laura Hanna
Remedial Project Manager
US EPA Region 10 Oregon Operations Office
805 SW Broadway, Suite 500 Name
Portland OR 97205

**Re: First Quarter 2024 Post-Closure Inspection Report
Gould Superfund Site**

Dear Ms. Hanna:

On behalf of StarLink Logistics, Inc. (StarLink), BSI America Professional Services Inc. (BSI) is submitting the First Quarter 2024 Post-Closure Inspection Report (Report) for the Gould Superfund Site (Site) to the United States Environmental Protection Agency (EPA). The inspection was conducted February 19, 2024.

Introduction

The first quarter 2024 Site inspection was performed in accordance with the Revised Operation and Maintenance Plan for the Gould Superfund Site, dated January 19, 2011 (AMEC 2011). Report attachments include a site location map (Attachment A), post-closure inspection form (Attachment B), leak detection sump analytical results summary table (Attachment C), laboratory analytical report (Attachment D), and photo table (Attachment E).

Onsite Containment Facility Cover Condition and Stability

The vegetative cover is well established, and no slope stability issues were identified. No ponded water was present on the onsite containment facility (OCF) cap. OCF cap drain outfall pipes were in good condition and free of blockage.

Access Roads and Security Fencing

Access roads were free of cracks, potholes, and erosion. Site security fencing was in good condition and gates and locks were operable.

Stormwater Systems

The Site received rain on the day of the inspection; ponded storm water was present in the low field and observed flowing into catch basin IB-3. No non-stormwater flow was observed in the stormwater

system. The stormwater systems were functional and inlet boxes and manhole channels were free of obstructions.

Leachate Collection and Removal

Leachate collection sumps (LCS) and leak detection sumps (LDS) were in good condition. Water levels in LCS and LDS monitoring points were recorded on the inspection form (Attachment B). Leachate removal and pre-treatment was last conducted in July 2022 in accordance with the 2001 Gould Site Operation and Maintenance (O&M) Plan. During the first quarter inspection, leachate depths in LCS-1 and LCS-2 were 0.99 ft and 1.02 ft respectively. Leachate removal is scheduled to be conducted in the second quarter of 2024 because leachate depth is at/near 1-ft.

Attachment C, the LDS analytical results summary table, is attached to this Report and provides historical depth to water measurements, sample results, and volumes of water removed from the respective LDSs during each quarter. During the first quarterly 2024 inspection, water levels measured in LDS-1 and LDS-2 were 1.13 ft and 0.35 ft respectively. On February 19, 2024, LDS-1 and LDS-2 were sampled using a peristaltic pump and then purged until no additional water could be removed. To date, observations and sample results of LDS water indicate continued protectiveness and function of the remedy.

Groundwater Monitoring

The next groundwater monitoring event is scheduled for May 2024.

EPA Sixth Five-Year Review Report

Section VI of the U.S. EPA Sixth Five-Year Review (FYR) Report concluded that there were “no issues and recommendations identified in this FYR.” The Other Findings subsection of Section VI included six recommendations identified as “not affecting current or future protectiveness.” Responses to the recommendations are provided below. For this Report, responses to the first and third recommendations were updated.

1. *The PRP should continue to report observations of ponded water in quarterly reports. At least one round of ponded water sampling needs to be performed with analysis for total and dissolved lead. The results of this sampling event should be included in a quarterly report. If elevated lead levels are found, EPA will evaluate whether further actions are necessary.*

Response: Ponded water was sampled for total and dissolved lead on March 9, 2023. The laboratory analytical results were attached to the First Quarter 2023 Post-Closure Inspection Report. There is no Portland Harbor surface water cleanup level for lead, and the groundwater risk-based cleanup level is 0.54 ug/L. Total and dissolved lead were not detected in ponded water above the Portland Harbor groundwater cleanup level.

2. *LDS-1 occasionally produced water during this FYR period. The PRP should continue to monitor water levels in both LDSs and should sample any water present for total and dissolved lead as required by the site O&M plan. These sample results should continue to be included in quarterly monitoring reports. If the results suggest a potential leak in the inner containment system due to increased lead concentrations, EPA will evaluate whether further actions are necessary.*



Response: In accordance with 2011 O&M Plan, LDSs will continue to be monitored for the presence of water. If water is present, the O&M Plan will continue to be followed for purging and sampling. Reported results are provided in Attachment C.

3. *Water is consistently observed in the LCS system. The PRP should continue to monitor water levels in these sumps and should perform at least one round of LCS water sampling with analysis for total and dissolved lead during the next leachate transfer operation. The results of this sampling event should be included in a quarterly report. If the results suggest the OCF is generating leachate, EPA will evaluate whether further actions are necessary.*

Response: As reported above, the LCS sumps were purged in July 2022, and pre-treated water was sampled during transfer to the Rhone-Poulenc Portland Site water treatment plant in accordance with the NPDES permit. In conjunction with the upcoming second quarter 2024 leachate transfer, samples of LCS water will be collected and analyzed for total and dissolved lead.

4. *Institutional controls are in place on the Gould property as well as the Schnitzer and former Rhone-Poulenc property (two parcels); however, they are not included or cited in the deeds for the Gould and former Rhone-Poulenc properties. The PRP needs to update deeds to include restrictive covenants. EPA will continue discussions with the PRP to identify specific actions necessary to resolve this finding.*

Response: The Gould PRP Group is in communication with EPA regarding any potentially necessary updates to the respective deeds.

5. *The PRPs need to complete the off-site wetland mitigation required as part of the remedy.*

Response: The Gould PRP Group will follow-up in a separate letter to EPA.

6. *The PRPs should continue to update the information repository as needed.*

Response: The Gould PRP Group will continue to update the information repository as needed.

Closing

The first quarter 2024 Gould site inspection found the Site to be in good working order. If you have any questions, please contact Ryan Stringfellow at (503) 451-5586 or Joan Underwood, Project Manager, at (503) 278-1837.

Regards,



Ryan Stringfellow, RG
Senior Consultant

Reviewed by:



Joan Underwood
Principal Consultant

cc: D. Lacey, DEQ
C. Miller, Sanofi US
D. Hatulla, Gould
J. Cronmiller, Gould
L. Maffei, CH



Attachments

Attachment A: Site Location Map

Attachment B: Gould Superfund Site Post-Closure Inspection Form

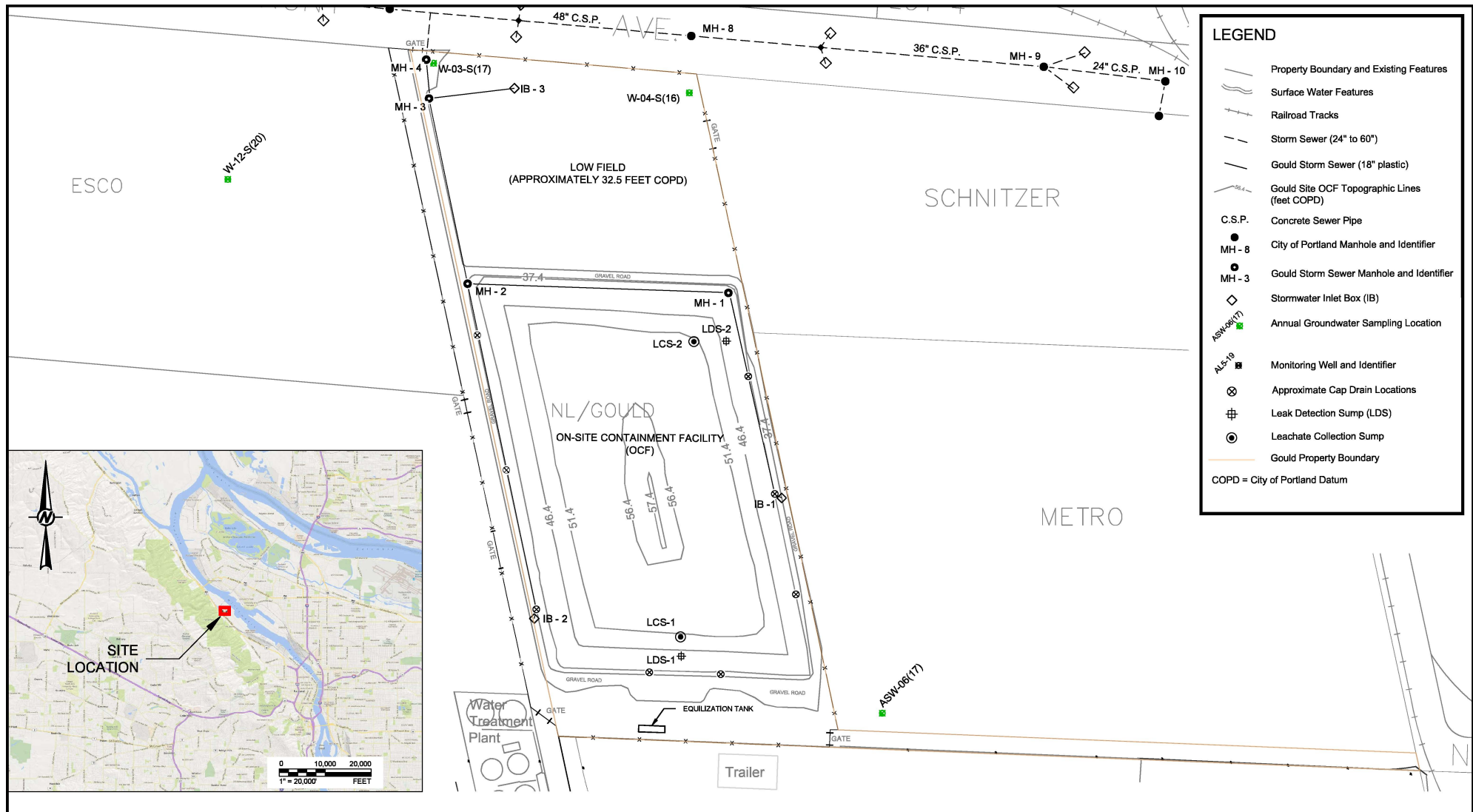
Attachment C: Leak Detection Sump Lead Analytical Results Summary Table

Attachment D: Laboratory Analytical Report

Attachment E: Photo Table

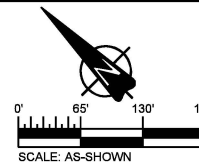
Attachment A

Site Location Map



General sewer information and location from www.portlandmaps.com, August 2003.

Information related to the location and elevation of the Gould Site storm sewer system was taken from the Final As-Built Grading Plan Figure, dated February 27, 2001; prepared by David Evans and Associates, Inc.



Map Projection: North American Datum (NAD) 1983 Oregon State Plane North in feet

DATE	2022-02-25
DESIGN	RSS
CAD	THR
CHECKED	RSS
REVIEW	TJN

TITLE:
ATTACHMENT A
SITE LOCATION MAP

REPORT:
Post-Closure Inspection Report
Gould Superfund Site
Portland, Oregon

Attachment B

Gould Superfund Site Post-Closure Inspection Form

**POST-CLOSURE INSPECTION FORM
GOULD SUPERFUND SITE, PORTLAND, OREGON**

Date of Inspection: 2/19/2024 Day of Inspection: Mon Time Started: 10:55 Time Completed: 13:30
 Weather: Cloudy Slightly Raining
 Attendees: Ethan Hensel

Inspection Checklist: Complete the checklist for all items. If deficiencies were observed during previous inspection, note if conditions have changed or been repaired since the previous inspection.

ITEM	Y/N	COMMENTS	MARK IF REPAIR NEEDED
OCF Cover			
Has proper vegetative cover been established?	Y		
Is additional seeding, mulching, or watering needed?	N		
When was mowing last conducted?		July 2023	
Have changes in vegetative coverage occurred?	N		
Is the integrity and effectiveness of the OCF soil cover acceptable?	Y		
Are erosion rills or soil cracking noted?	N		
Is ponding noted?	N		
Is settlement or subsidence visible?	N		
Are OCF slopes visually stable?	Y		
Is burrowing or tunneling present?	N		
Are all eight cap drain outfall pipes free of blockage?	Y		
Access Roads			
Are cracks, potholes or erosion present?	N		
Is the roadway in adequate working condition?	Y		

**POST-CLOSURE INSPECTION FORM
GOULD SUPERFUND SITE, PORTLAND, OREGON**

ITEM	Y/N	COMMENTS	MARK IF REPAIR NEEDED
Site Security Fences			
Are rust/deterioration present?	N		
Is the fence breached?	N		
Are all gates and locks operative?	Y		
Is the barbed wire intact?	Y		
Is burrowing or tunneling present under the fences?	N		
Is required signage present?	Y		
Stormwater System			
Were all inlet box covers and manhole lids removed for inspection?	Y		
Has blockage or clogging occurred in channels, inlet boxes (3), manholes (4) or collection pipes (3)?	N		
Are sediments present in channels, inlet boxes, manholes, or collection pipes?		IB-1: Minor accumulation of sediment MH-1: " " IB-2: MH-2: IB-3: MH-3: MH-4: 	

**POST-CLOSURE INSPECTION FORM
GOULD SUPERFUND SITE, PORTLAND, OREGON**

ITEM	Y/N	COMMENTS	MARK IF REPAIR NEEDED
Was any non-stormwater flow present in channels, inlet boxes, manholes, or collection pipes?		IB-1: <i>NO</i> MH-1: <i>NO</i> IB-2: <i>NO</i> MH-2: <i>NO</i> IB-3: <i>NO</i> MH-3: <i>NO</i> MH-4: <i>NO</i>	
Has erosion occurred in areas other than the OCF?	<i>N</i>		
Leachate Collection System			
Is the general condition of the leachate collection manholes adequate?	<i>Y</i>		
Were manhole lids removed during inspection?	<i>Y</i>		
Is water present in the leachate collection manholes? (DTW - depth to water; TOM - top of manhole; DTB - depth to bottom) Note quantity of water transferred to equalization tank.		LCS-1 DTW= <i>19.44'</i> DTB= <i>20.43'</i> LCS-2 DTW= <i>18.38'</i> DTB= <i>19.40'</i>	
Is the general condition of the leak detection sumps adequate?	<i>Y</i>		
Were sump lids removed during inspection?	<i>Y</i>		
Is water present in the leak detection sumps? (DTW - depth to water; TOC - top of casing; DTB - depth to bottom) Note quantity of water transferred to leachate pretreatment system.		LDS-1 DTW= <i>30.61</i> DTB= <i>31.74</i> LDS-2 DTW= <i>31.97'</i> DTB= <i>32.32'</i>	
Leachate Pretreatment and Removal System			
Is the equalization tank intact and not leaking?	<i>Y</i>		
Is the bermed area intact?	<i>Y</i>		

Notes:

IB = Inlet box
 MH = Manhole
 N = No
 OCF = On-site Containment Facility
 Y = Yes
 NA = not applicable

DTW = depth to water
 DTB = depth to bottom
 gpm = gallons per minute
 TOC = top of casing
 TOM = top of manhole

Attachment C

Leak Detection Sump Lead Analytical Results Summary Table

Attachment C
Leak Detection Sump Lead Analytical Results Summary
Gould Superfund Site Post-Closure Inspection

Date	Measured Depth of Water in Sump ^{1,2}	Volume of Water Transferred to On-Site Tank	Analytical Results EPA Method 6020 ³	
			Total	Dissolved
	feet	gallons	ug/L	
LDS-1				
1Q2012	1.5	40	0.667 J	0.500 U
2Q2012	dry	--	--	--
3Q2012	dry	--	--	--
4Q2012	dry	--	--	--
1Q2013	dry	--	--	--
2Q2013	dry	--	--	--
3Q2013	dry	--	--	--
4Q2013	dry	--	--	--
1Q2014	dry	--	--	--
2Q2014	dry	--	--	--
3Q2014	dry	--	--	--
4Q2014	dry	--	--	--
1Q2015	dry	--	--	--
2Q2015	dry	--	--	--
3Q2015	dry	--	--	--
4Q2015	dry	--	--	--
1Q2016	2.2	50	0.300	0.200 U
2Q2016	dry	--	--	--
3Q2016	dry	--	--	--
4Q2016	1.4	21	0.266	0.200 U
1Q2017	3.18	72	1.490	0.411
2Q2017	dry	--	--	--
3Q2017	dry	--	--	--
4Q2017	dry	--	--	--
1Q2018	dry	--	--	--
2Q2018	dry	--	--	--
3Q2018	dry	--	--	--
4Q2018	dry	--	--	--
1Q2019	dry	--	--	--
2Q2019	dry	--	--	--
3Q2019	dry	--	--	--
4Q2019	dry	--	--	--
1Q2020	dry	--	--	--
2Q2020	dry	--	--	--
3Q2020	dry	--	--	--
4Q2020	dry	--	--	--
1Q2021	dry	--	--	--
2Q2021	dry	--	--	--
3Q2021	dry	--	--	--
4Q2021	dry	--	--	--
1Q2022	dry	--	--	--
2Q2022	dry	--	--	--
3Q2022	dry	--	--	--
4Q2022	dry	--	--	--
1Q2023	0.93	18	0.554	0.266

Attachment C
Leak Detection Sump Lead Analytical Results Summary
Gould Superfund Site Post-Closure Inspection

Date	Measured Depth of Water in Sump ^{1,2}	Volume of Water Transferred to On-Site Tank	Analytical Results EPA Method 6020 ³	
			Total	Dissolved
	feet	gallons	ug/L	
2Q2023	dry	--	--	--
3Q2023	dry	--	--	--
4Q2023	dry	--	--	--
1Q2024	1.13	17	1.27	0.239
LDS-2				
2Q2006	0.75	17	1.00 U	1.00 U
3Q2006	dry	--	--	--
4Q2006	1.00	water not transferred	NS	NS
1Q2007	2.40	water not transferred	NS	NS
2Q2007	2.60	12	1.43	1.00 U
3Q2007	0.91	17	1.53 U	1.53 U
4Q2007	1.15	18	0.244 J	0.243 U
1Q2008	0.90	12	1.70	0.243 U
2Q2008	0.94	14	0.924 J	0.220 U
3Q2008	0.43	14	5.40	1.00 U
4Q2008	0.34	8	4.89	1.5
1Q2009	0.64	5	0.878 J	0.0719 U
2Q2009	0.19	7	0.833 J	0.0778 J
3Q2009	0.30	5	0.0980 U	0.611 J
4Q2009	0.21	3	0.200 U	0.333 J
1Q2010	1.00	10	0.889 J	0.200 U
2Q2010	2.97	70	0.544 J	0.200 U
3Q2010	0.95	18	0.656 J	0.200 U
4Q2010	0.26	10	1.48	0.200 U
1Q2011	0.75	7	0.389 J	0.200 U
2Q2011	0.60	2	1.73	0.200 U
3Q2011	0.60	4	0.500 U	0.500 U
4Q2011	0.50	7	0.500 U	0.500 U
1Q2012	dry	--	--	--
2Q2012	dry	--	--	--
3Q2012	dry	--	--	--
4Q2012	dry	--	--	--
1Q2013	dry	--	--	--
2Q2013	dry	--	--	--
3Q2013	dry	--	--	--
4Q2013	dry	--	--	--
1Q2014	dry	--	--	--
2Q2014	dry	--	--	--
3Q2014	dry	--	--	--
4Q2014	dry	--	--	--
1Q2015	dry	--	--	--
2Q2015	dry	--	--	--
3Q2015	dry	--	--	--
4Q2015	dry	--	--	--
1Q2016	dry	--	--	--
2Q2016	dry	--	--	--

Attachment C
Leak Detection Sump Lead Analytical Results Summary
Gould Superfund Site Post-Closure Inspection

Date	Measured Depth of Water in Sump ^{1,2}	Volume of Water Transferred to On-Site Tank	Analytical Results EPA Method 6020 ³	
			Total	Dissolved
	feet	gallons	ug/L	
3Q2016	dry	--	--	--
4Q2016	dry	--	--	--
1Q2017	dry	--	--	--
2Q2017	dry	--	--	--
3Q2017	dry	--	--	--
4Q2017	dry	--	--	--
1Q2018	dry	--	--	--
2Q2018	1.02	7	0.21	0.200 U
3Q2018	dry	--	--	--
4Q2018	dry	--	--	--
1Q2019	1.17	10	0.200 U	0.200 U
2Q2019	0.95	13	0.200 U	0.200 U
3Q2019	0.60	2	NS	NS
4Q2019	0.42	water not transferred	NS	NS
1Q2020	0.39	water not transferred	NS	NS
2Q2020	0.47	water not transferred	NS	NS
3Q2020	0.50	water not transferred	NS	NS
4Q2020	0.51	water not transferred	NS	NS
1Q2021	0.55	water not transferred	NS	NS
2Q2021	0.55	water not transferred	NS	NS
3Q2021	0.54	3	0.437	0.200 U
4Q2021	0.35	water not transferred	NS	NS
1Q2022	dry	--	--	--
2Q2022	dry	--	--	--
3Q2022	0.53	2	0.200 U	0.200 U
4Q2022	0.45	water not transferred	NS	NS
1Q2023	0.38	<1	0.200 U	0.200 U
2Q2023	0.37	water not transferred	NS	NS
3Q2023	0.41	water not transferred	NS	NS
4Q2023	0.35	water not transferred	NS	NS
1Q2024	0.35	3.5	0.200 U	0.200 U

Notes:

The Record of Decision (ROD) established 15 ug/L action level for screening lead in groundwater.

¹ Measured depth along inside of leak detection sump pipes positioned at approximately 27° angles.

² Records presented in this table begin with the first recorded observation of water present in the sump during quarterly inspection.

³ Samples collected 3Q2007 and 2Q2008 were analyzed using EPA Method 200.

EPA - United States Environmental Protection Agency

J - estimated results between method detection limit (MDL) and method reporting limit (MRL)

LDS - Leak Detection Sump

-- not applicable

NS - not sampled

U - The analyte was not detected at or above the listed MRL.

ug/L - micrograms per liter

Attachment D

Laboratory Analytical Report



ANALYTICAL REPORT

Apex Laboratories, LLC

6700 S.W. Sandburg Street
Tigard, OR 97223
503-718-2323
ORELAP ID: OR100062

Friday, March 8, 2024

Ryan Stringfellow

BSI America Professional Services Inc.

1400 NW Compton Dr, Ste 203

Hillsboro OR, OR 97006

RE: A4B1413 - Gould - [none]

Thank you for using Apex Laboratories. We greatly appreciate your business and strive to provide the highest quality services to the environmental industry.

Enclosed are the results of analyses for work order A4B1413, which was received by the laboratory on 2/20/2024 at 10:18:00AM.

If you have any questions concerning this report or the services we offer, please feel free to contact me by email at: pnerenberg@apex-labs.com, or by phone at 503-718-2323.

Please note: All samples will be disposed of within 30 days of sample receipt, unless prior arrangements have been made.

Cooler Receipt Information

Acceptable Receipt Temperature is less than, or equal to, 6 degC (not frozen), or received on ice the same day as sampling.

(See Cooler Receipt Form for details)

Default Cooler 1.1 degC

This Final Report is the official version of the data results for this sample submission, unless superseded by a subsequent, labeled amended report.

All other deliverables derived from this data, including Electronic Data Deliverables (EDDs), CLP-like forms, client requested summary sheets, and all other products are considered secondary to this report.



Apex Laboratories

Philip Nerenberg

The results in this report apply to the samples analyzed in accordance with the chain of custody document(s) and updated by any subsequent written communications. This analytical report must be reproduced in its entirety.

Philip Nerenberg, Lab Director



ANALYTICAL REPORT

Apex Laboratories, LLC

6700 S.W. Sandburg Street
Tigard, OR 97223
503-718-2323
ORELAP ID: OR100062

BSI America Professional Services Inc.

1400 NW Compton Dr, Ste 203
Hillsboro OR, OR 97006

Project: Gould

Project Number: [none]

Project Manager: Ryan Stringfellow

Report ID:

A4B1413 - 03 08 24 1505

ANALYTICAL REPORT FOR SAMPLES

SAMPLE INFORMATION

Client Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
LDS-1	A4B1413-01	Water	02/19/24 15:00	02/20/24 10:18
LDS-2	A4B1413-02	Water	02/19/24 15:15	02/20/24 10:18

Apex Laboratories

Philip Nerenberg, Lab Director

The results in this report apply to the samples analyzed in accordance with the chain of custody document(s) and updated by any subsequent written communications. This analytical report must be reproduced in its entirety.

**ANALYTICAL REPORT****Apex Laboratories, LLC**

6700 S.W. Sandburg Street

Tigard, OR 97223

503-718-2323

ORELAP ID: OR100062

BSI America Professional Services Inc.

1400 NW Compton Dr, Ste 203

Hillsboro OR, OR 97006

Project: **Gould**

Project Number: [none]

Project Manager: **Ryan Stringfellow****Report ID:****A4B1413 - 03 08 24 1505****ANALYTICAL SAMPLE RESULTS****Total Metals by EPA 6020B (ICPMS)**

Analyte	Sample Result	Detection Limit	Reporting Limit	Units	Dilution	Date Analyzed	Method Ref.	Notes
LDS-1 (A4B1413-01)		Matrix: Water						
Batch: 24B0854								
Lead	1.27	---	0.200	ug/L	1	02/27/24 05:23	EPA 6020B	
LDS-2 (A4B1413-02)		Matrix: Water						
Batch: 24B0854								
Lead	ND	---	0.200	ug/L	1	02/27/24 05:30	EPA 6020B	

Apex Laboratories

Philip Nerenberg, Lab Director

The results in this report apply to the samples analyzed in accordance with the chain of custody document(s) and updated by any subsequent written communications. This analytical report must be reproduced in its entirety.

**ANALYTICAL REPORT****Apex Laboratories, LLC**

6700 S.W. Sandburg Street

Tigard, OR 97223

503-718-2323

ORELAP ID: OR100062

BSI America Professional Services Inc.

1400 NW Compton Dr, Ste 203

Hillsboro OR, OR 97006

Project: **Gould**

Project Number: [none]

Project Manager: **Ryan Stringfellow****Report ID:****A4B1413 - 03 08 24 1505****ANALYTICAL SAMPLE RESULTS****Dissolved Metals by EPA 6020B (ICPMS)**

Analyte	Sample Result	Detection Limit	Reporting Limit	Units	Dilution	Date Analyzed	Method Ref.	Notes
LDS-1 (A4B1413-01)		Matrix: Water						
Batch: 24C0253								
Lead	0.239	---	0.200	ug/L	1	03/07/24 17:37	EPA 6020B (Diss)	
LDS-2 (A4B1413-02)		Matrix: Water						
Batch: 24C0253								
Lead	ND	---	0.200	ug/L	1	03/07/24 17:50	EPA 6020B (Diss)	

Apex Laboratories

Philip Nerenberg, Lab Director

The results in this report apply to the samples analyzed in accordance with the chain of custody document(s) and updated by any subsequent written communications. This analytical report must be reproduced in its entirety.



ANALYTICAL REPORT

Apex Laboratories, LLC

6700 S.W. Sandburg Street
Tigard, OR 97223
503-718-2323
ORELAP ID: OR100062BSI America Professional Services Inc.
1400 NW Compton Dr, Ste 203
Hillsboro OR, OR 97006Project: **Gould**
Project Number: [none]
Project Manager: Ryan Stringfellow**Report ID:**
A4B1413 - 03 08 24 1505

QUALITY CONTROL (QC) SAMPLE RESULTS

Total Metals by EPA 6020B (ICPMS)

Analyte	Result	Detection Limit	Reporting Limit	Units	Dilution	Spike Amount	Source Result	% REC	% REC Limits	RPD	RPD Limit	Notes
Batch 24B0854 - EPA 3015A						Water						
Blank (24B0854-BLK1)			Prepared: 02/26/24 10:19 Analyzed: 02/26/24 15:58									
EPA 6020B												
Lead	ND	---	0.200	ug/L	1	---	---	---	---	---	---	
LCS (24B0854-BS1)			Prepared: 02/26/24 10:19 Analyzed: 02/26/24 16:05									
EPA 6020B												
Lead	58.0	---	0.200	ug/L	1	55.6	---	104	80-120%	---	---	
Duplicate (24B0854-DUP1)			Prepared: 02/26/24 10:19 Analyzed: 02/26/24 16:19									
QC Source Sample: Non-SDG (A4B1149-12)												
Lead	1.10	---	0.200	ug/L	1	---	1.12	---	---	2	20%	
Matrix Spike (24B0854-MS1)			Prepared: 02/26/24 10:19 Analyzed: 02/26/24 16:26									
QC Source Sample: Non-SDG (A4B1149-12)												
EPA 6020B												
Lead	57.5	---	0.200	ug/L	1	55.6	1.12	101	75-125%	---	---	

Apex Laboratories

Philip Nerenberg, Lab Director

The results in this report apply to the samples analyzed in accordance with the chain of custody document(s) and updated by any subsequent written communications. This analytical report must be reproduced in its entirety.



ANALYTICAL REPORT

Apex Laboratories, LLC

6700 S.W. Sandburg Street

Tigard, OR 97223

503-718-2323

ORELAP ID: OR100062

BSI America Professional Services Inc.

1400 NW Compton Dr, Ste 203

Hillsboro OR, OR 97006

Project: Gould

Project Number: [none]

Project Manager: Ryan Stringfellow

Report ID:

A4B1413 - 03 08 24 1505

QUALITY CONTROL (QC) SAMPLE RESULTS

Dissolved Metals by EPA 6020B (ICPMS)

Analyte	Result	Detection Limit	Reporting Limit	Units	Dilution	Spike Amount	Source Result	% REC	% REC Limits	RPD	RPD Limit	Notes
Batch 24C0253 - Matrix Matched Direct Inject						Water						
Blank (24C0253-BLK1)			Prepared: 03/07/24 12:17 Analyzed: 03/07/24 17:24									
EPA 6020B (Diss)												
Lead	ND	---	0.200	ug/L	1	---	---	---	---	---	---	
LCS (24C0253-BS1)			Prepared: 03/07/24 12:17 Analyzed: 03/07/24 17:31									
EPA 6020B (Diss)												
Lead	55.0	---	0.200	ug/L	1	55.6	---	99	80-120%	---	---	
Duplicate (24C0253-DUP1)			Prepared: 03/07/24 12:17 Analyzed: 03/07/24 17:43									
QC Source Sample: LDS-1 (A4B1413-01)												
EPA 6020B (Diss)												
Lead	0.244	---	0.200	ug/L	1	---	0.239	---	---	2	20%	
Matrix Spike (24C0253-MS1)			Prepared: 03/07/24 12:17 Analyzed: 03/07/24 17:56									
QC Source Sample: LDS-2 (A4B1413-02)												
EPA 6020B (Diss)												
Lead	53.9	---	0.200	ug/L	1	55.6	ND	97	75-125%	---	---	

Apex Laboratories

Philip Nerenberg, Lab Director

The results in this report apply to the samples analyzed in accordance with the chain of custody document(s) and updated by any subsequent written communications. This analytical report must be reproduced in its entirety.

**ANALYTICAL REPORT****Apex Laboratories, LLC**

6700 S.W. Sandburg Street

Tigard, OR 97223

503-718-2323

ORELAP ID: OR100062

BSI America Professional Services Inc.

1400 NW Compton Dr, Ste 203

Hillsboro OR, OR 97006

Project: **Gould**

Project Number: [none]

Project Manager: **Ryan Stringfellow****Report ID:****A4B1413 - 03 08 24 1505****SAMPLE PREPARATION INFORMATION****Total Metals by EPA 6020B (ICPMS)****Prep: EPA 3015A**

Lab Number	Matrix	Method	Sampled	Prepared	Sample Initial/Final	Default Initial/Final	RL Prep Factor
<u>Batch: 24B0854</u>							
A4B1413-01	Water	EPA 6020B	02/19/24 15:00	02/26/24 10:19	45mL/50mL	45mL/50mL	1.00
A4B1413-02	Water	EPA 6020B	02/19/24 15:15	02/26/24 10:19	45mL/50mL	45mL/50mL	1.00

Dissolved Metals by EPA 6020B (ICPMS)**Prep: Matrix Matched Direct Inject**

Lab Number	Matrix	Method	Sampled	Prepared	Sample Initial/Final	Default Initial/Final	RL Prep Factor
<u>Batch: 24C0253</u>							
A4B1413-01	Water	EPA 6020B (Diss)	02/19/24 15:00	03/07/24 12:17	45mL/50mL	45mL/50mL	1.00
A4B1413-02	Water	EPA 6020B (Diss)	02/19/24 15:15	03/07/24 12:17	45mL/50mL	45mL/50mL	1.00

Apex Laboratories

Philip Nerenberg, Lab Director

The results in this report apply to the samples analyzed in accordance with the chain of custody document(s) and updated by any subsequent written communications. This analytical report must be reproduced in its entirety.



ANALYTICAL REPORT

Apex Laboratories, LLC

6700 S.W. Sandburg Street

Tigard, OR 97223

503-718-2323

ORELAP ID: OR100062

BSI America Professional Services Inc.

1400 NW Compton Dr, Ste 203

Hillsboro OR, OR 97006

Project: Gould

Project Number: [none]

Project Manager: Ryan Stringfellow

Report ID:

A4B1413 - 03 08 24 1505

QUALIFIER DEFINITIONS

Client Sample and Quality Control (QC) Sample Qualifier Definitions:

There are No Qualifiers on Sample or QC Data for this report

Apex Laboratories

Philip Nerenberg, Lab Director

The results in this report apply to the samples analyzed in accordance with the chain of custody document(s) and updated by any subsequent written communications. This analytical report must be reproduced in its entirety.



ANALYTICAL REPORT

Apex Laboratories, LLC

6700 S.W. Sandburg Street
Tigard, OR 97223
503-718-2323
ORELAP ID: OR100062

BSI America Professional Services Inc.

1400 NW Compton Dr, Ste 203
Hillsboro OR, OR 97006

Project: **Gould**

Project Number: [none]

Project Manager: **Ryan Stringfellow**

Report ID:

A4B1413 - 03 08 24 1505

REPORTING NOTES AND CONVENTIONS:

Abbreviations:

DET Analyte DETECTED at or above the detection or reporting limit.
ND Analyte NOT DETECTED at or above the detection or reporting limit.
NR Result Not Reported
RPD Relative Percent Difference. RPDs for Matrix Spikes and Matrix Spike Duplicates are based on concentration, not recovery.

Detection Limits: Limit of Detection (LOD)

Limits of Detection (LODs) are normally set at a level of one half the validated Limit of Quantitation (LOQ).
If no value is listed ('-----'), then the data has not been evaluated below the Reporting Limit.

Reporting Limits: Limit of Quantitation (LOQ)

Validated Limits of Quantitation (LOQs) are reported as the Reporting Limits for all analyses where the LOQ, MRL, PQL or CRL are requested. The LOQ represents a level at or above the low point of the calibration curve, that has been validated according to Apex Laboratories' comprehensive LOQ policies and procedures.

Reporting Conventions:

Basis: Results for soil samples are generally reported on a 100% dry weight basis.

The Result Basis is listed following the units as "dry", "wet", or " " (blank) designation.

"dry" Sample results and Reporting Limits are reported on a dry weight basis. (i.e. "ug/kg dry")

See Percent Solids section for details of dry weight analysis.

"wet" Sample results and Reporting Limits for this analysis are normally dry weight corrected, but have not been modified in this case.

" " Results without 'wet' or 'dry' designation are not normally dry weight corrected. These results are considered 'As Received'.

Results for Volatiles analyses on soils and sediments that are reported on a "dry weight" basis include the water miscible solvent (WMS) correction referenced in the EPA 8000 Method guidance documents. Solid and Liquid samples reported on an "As Received" basis do not have the WMS correction applied, as dry weight was not performed.

QC Source:

In cases where there is insufficient sample provided for Sample Duplicates and/or Matrix Spikes, a Lab Control Sample Duplicate (LCS Dup) may be analyzed to demonstrate accuracy and precision of the extraction batch.

Non-Client Batch QC Samples (Duplicates and Matrix Spike/Duplicates) may not be included in this report. Please request a Full QC report if this data is required.

Miscellaneous Notes:

" --- " QC results are not applicable. For example, % Recoveries for Blanks and Duplicates, % RPD for Blanks, Blank Spikes and Matrix Spikes, etc.

" *** " Used to indicate a possible discrepancy with the Sample and Sample Duplicate results when the %RPD is not available. In this case, either the Sample or the Sample Duplicate has a reportable result for this analyte, while the other is Non Detect (ND).

Apex Laboratories

Philip Nerenberg, Lab Director

The results in this report apply to the samples analyzed in accordance with the chain of custody document(s) and updated by any subsequent written communications. This analytical report must be reproduced in its entirety.



ANALYTICAL REPORT

Apex Laboratories, LLC

6700 S.W. Sandburg Street
Tigard, OR 97223
503-718-2323
ORELAP ID: OR100062

BSI America Professional Services Inc.

1400 NW Compton Dr, Ste 203
Hillsboro OR, OR 97006

Project: **Gould**

Project Number: [none]

Project Manager: **Ryan Stringfellow**

Report ID:

A4B1413 - 03 08 24 1505

REPORTING NOTES AND CONVENTIONS (Cont.):

Blanks:

Standard practice is to evaluate the results from Blank QC Samples down to a level equal to ½ the Reporting Limit (RL).

-For Blank hits falling between ½ the RL and the RL (J flagged hits), the associated sample and QC data will receive a 'B-02' qualifier.

-For Blank hits above the RL, the associated sample and QC data will receive a 'B' qualifier, per Apex Laboratories' Blank Policy.

For further details, please request a copy of this document.

-Sample results flagged with a 'B' or 'B-02' qualifier are potentially biased high if the sample results are less than ten times the level found in the blank for inorganic analyses, or less than five times the level found in the blank for organic analyses.

'B' and 'B-02' qualifications are only applied to sample results detected above the Reporting Level, if results are not reported to the MDL.

Preparation Notes:

Mixed Matrix Samples:

Water Samples:

Water samples containing significant amounts of sediment are decanted or separated prior to extraction, and only the water portion analyzed, unless otherwise directed by the client.

Soil and Sediment Samples:

Soil and Sediment samples containing significant amounts of water are decanted prior to extraction, and only the solid portion analyzed, unless otherwise directed by the client.

Sampling and Preservation Notes:

Certain regulatory programs, such as National Pollutant Discharge Elimination System (NPDES), require that activities such as sample filtration (for dissolved metals, orthophosphate, hexavalent chromium, etc.) and testing of short hold analytes (pH, Dissolved Oxygen, etc.) be performed in the field (on-site) within a short time window. In addition, sample matrix spikes are required for some analyses, and sufficient volume must be provided, and billable site specific QC requested, if this is required. All regulatory permits should be reviewed to ensure that these requirements are being met.

Data users should be aware of which regulations pertain to the samples they submit for testing. If related sample collection activities are not approved for a particular regulatory program, results should be considered estimates. Apex Laboratories will qualify these analytes according to the most stringent requirements, however results for samples that are for non-regulatory purposes may be acceptable.

Samples that have been filtered and preserved at Apex Laboratories per client request are listed in the preparation section of the report with the date and time of filtration listed.

Apex Laboratories maintains detailed records on sample receipt, including client label verification, cooler temperature, sample preservation, hold time compliance and field filtration. Data is qualified as necessary, and the lack of qualification indicates compliance with required parameters.

Benzofluoranthene Isomer Reporting:

Due to coelution on the analytical column, the Benzo(b)fluoranthene results represent the concentration of both Benzo(b)fluoranthene and Benzo(j) fluoranthene. Calibration is based on the response of Benzo(b)fluoranthene, and the results represent the combined Benzo(b+j)fluoranthene(s).

Apex Laboratories

The results in this report apply to the samples analyzed in accordance with the chain of custody document(s) and updated by any subsequent written communications. This analytical report must be reproduced in its entirety.

Philip Nerenberg, Lab Director



ANALYTICAL REPORT

Apex Laboratories, LLC

6700 S.W. Sandburg Street
Tigard, OR 97223
503-718-2323
ORELAP ID: OR100062

BSI America Professional Services Inc.

1400 NW Compton Dr, Ste 203

Hillsboro OR, OR 97006

Project: **Gould**

Project Number: [none]

Project Manager: **Ryan Stringfellow**

Report ID:

A4B1413 - 03 08 24 1505

LABORATORY ACCREDITATION INFORMATION

ORELAP Certification ID: OR100062 (Primary Accreditation) -

EPA ID: OR01039

All methods and analytes reported from work performed at Apex Laboratories are included on Apex Laboratories' ORELAP Scope of Certification, with the exception of any analyte(s) listed below:

Apex Laboratories

Matrix	Analysis	TNI_ID	Analyte	TNI_ID	Accreditation
<u>All reported analytes are included in Apex Laboratories' current ORELAP scope.</u>					

Secondary Accreditations

Apex Laboratories also maintains reciprocal accreditation with non-TNI states (Washington DOE), as well as other state specific accreditations not listed here.

Subcontract Laboratory Accreditations

Subcontracted data falls outside of Apex Laboratories' Scope of Accreditation.

Please see the Subcontract Laboratory report for full details, or contact your Project Manager for more information.

Field Testing Parameters

Results for Field Tested data are provided by the client or sampler, and fall outside of Apex Laboratories' Scope of Accreditation.

Apex Laboratories

Philip Nerenberg, Lab Director

The results in this report apply to the samples analyzed in accordance with the chain of custody document(s) and updated by any subsequent written communications. This analytical report must be reproduced in its entirety.



ANALYTICAL REPORT

Apex Laboratories, LLC

6700 S.W. Sandburg Street

Tigard, OR 97223

503-718-2323

ORELAP ID: OR100062

BSI America Professional Services Inc.

1400 NW Compton Dr, Ste 203

Hillsboro OR, OR 97006

Project: Gould

Project Number: [none]

Project Manager: Ryan Stringfellow

Report ID:

A4B1413 - 03 08 24 1505

APEX LABS COOLER RECEIPT FORM

Client: BSI America Professional Services Inc. Element WO#: A4 B1413Project/Project #: Gould

Delivery Info:

Date/time received: 2/20/24 @ 1018 By: ESTDelivered by: Apex ☒ Client ☐ ESS ☐ FedEx ☐ UPS ☐ Radio ☐ Morgan ☐ SDS ☐ Evergreen ☐ Other ☐Cooler Inspection Date/time inspected: 2/20/24 @ 1055 By: ESTChain of Custody included? Yes ☒ No ☐Signed/dated by client? Yes ☒ No ☐

	Cooler #1	Cooler #2	Cooler #3	Cooler #4	Cooler #5	Cooler #6	Cooler #7
Temperature (°C)	<u>1.1</u>						
Custody seals? (Y/N)	<u>N</u>						
Received on ice? (Y/N)	<u>Y</u>						
Temp. blanks? (Y/N)	<u>Y</u>						
Ice type: (Gel/Real/Other)	<u>Gel</u>						
Condition (In/Out):	<u>In</u>						

Cooler out of temp? (Y/N) Possible reason why:

Green dots applied to out of temperature samples? Yes ☒ No ☐Out of temperature samples form initiated? Yes ☒ No ☐Sample Inspection: Date/time inspected: 2/20/24 @ 1416 By: ISAll samples intact? Yes ☒ No ☐ Comments:Bottle labels/COCs agree? Yes ☒ No ☐ Comments:COC/container discrepancies form initiated? Yes ☐ No ☒Containers/volumes received appropriate for analysis? Yes ☒ No ☐ Comments:Do VOA vials have visible headspace? Yes ☐ No ☐ NA ☒

Comments:

Water samples: pH checked: Yes ☒ No ☐ NA ☐ pH appropriate? Yes ☒ No ☐ NA ☐ pH ID: A231172

Comments:

Additional information:

Labeled by: ISWitness: ISCooler Inspected by: EST

Form Y-003 R-01

Apex Laboratories

Philip Nerenberg

Philip Nerenberg, Lab Director

The results in this report apply to the samples analyzed in accordance with the chain of custody document(s) and updated by any subsequent written communications. This analytical report must be reproduced in its entirety.

Attachment E

Photo Table

Attachment E
Post Closure Inspection Report
Gould Superfund Site

Photo Table



Photo 1: View of stormwater ponding in the low field looking Northeast from LCS-2.

Date: 02/19/2023



Photo 2: View of stormwater ponding in the low field looking West from NW Front Ave.

Date: 02/19/2023