



February 17, 2025

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

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

Dear Ms. Hanna:

On behalf of the Gould PRP Group, BSI America Professional Services Inc. (BSI) is submitting the Fourth 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 November 8, 2024.

**Introduction**

The fourth 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), and leak-detection sump analytical results summary table (Attachment C).

**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

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 conducted in May 2024 in accordance with the 2001 Gould Site Operation and Maintenance (O&M) Plan. During the fourth-quarter inspection, leachate depths in LCS-1 and LCS-2 were 0.70 ft and 0.62 ft, respectively.

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 LDS during each quarter. During the fourth quarterly 2024 inspection, LDS-1 was dry, and 0.20 ft of water was measured in LDS-2. 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 2025.

## 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 fourth and fifth 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, the 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 May 2024, and treated leachate was sampled during transfer to the Rhone-Poulenc Portland Site water treatment plant in accordance with the NPDES permit. Sample results were provided in the Second Quarter 2024 Post-Closure Inspection Report.

- 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 the EPA regarding potential updates to the Gould property deed. StarLink Logistics Inc. has previously communicated with EPA that a restrictive covenant dated December 11, 2000, was recorded by Rhône-Poulenc on its property on February 7, 2001, pursuant to the 1998 Gould Superfund Site Consent Decree.

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

**Response:** The Gould PRP Group and EPA are working to resolve this requirement.

- 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

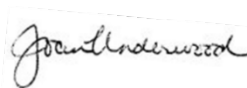
The fourth quarter 2024 Gould site inspection found the Site to be in good working order. If you have any questions, please contact Ryan Stringfellow at (503) 451-5586 or Joan Underwood at (503) 278-1837.

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

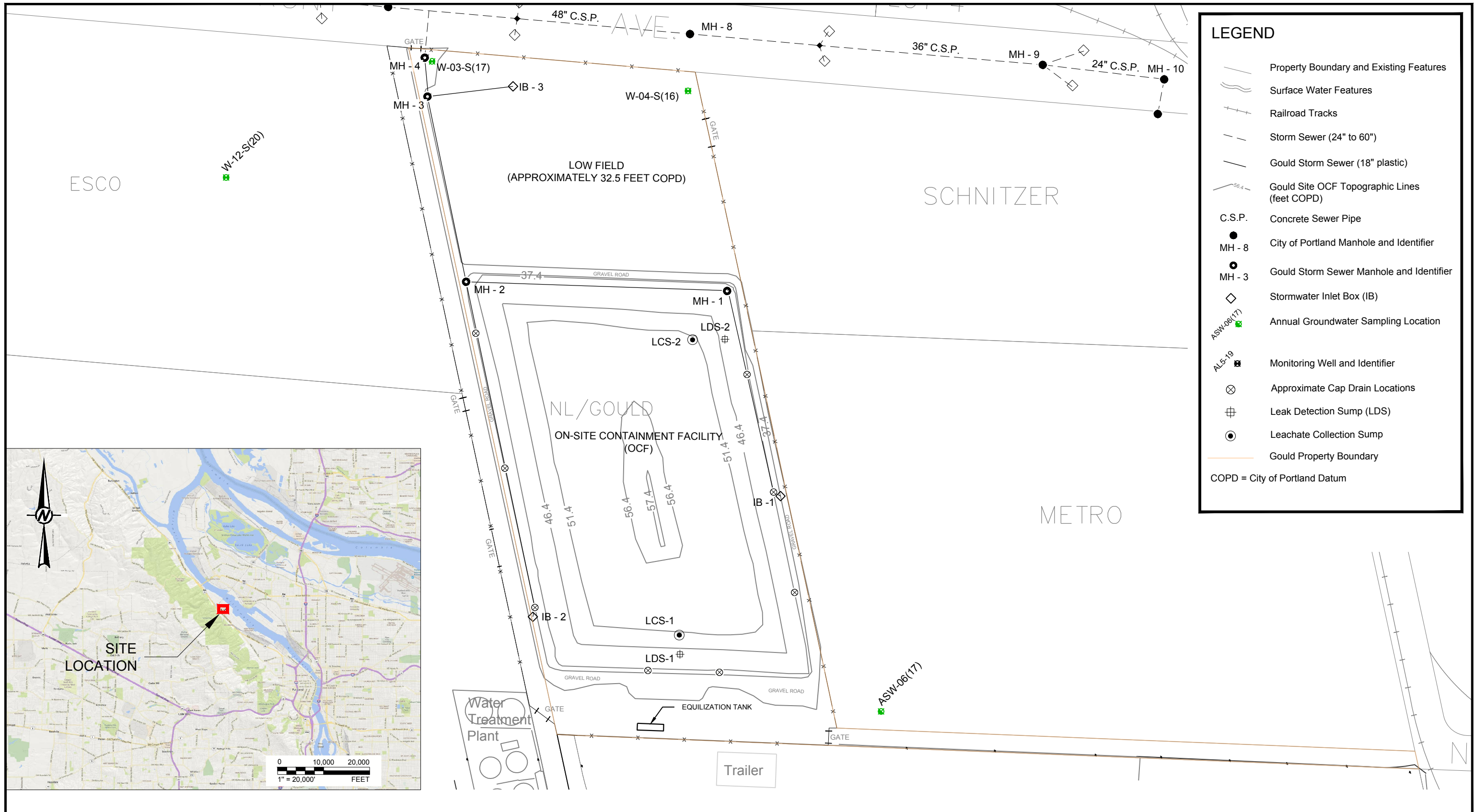
Attachment B: Gould Superfund Site Post-Closure Inspection Form

Attachment C: Leak Detection Sump Lead Analytical Results Summary Table

## Attachment A

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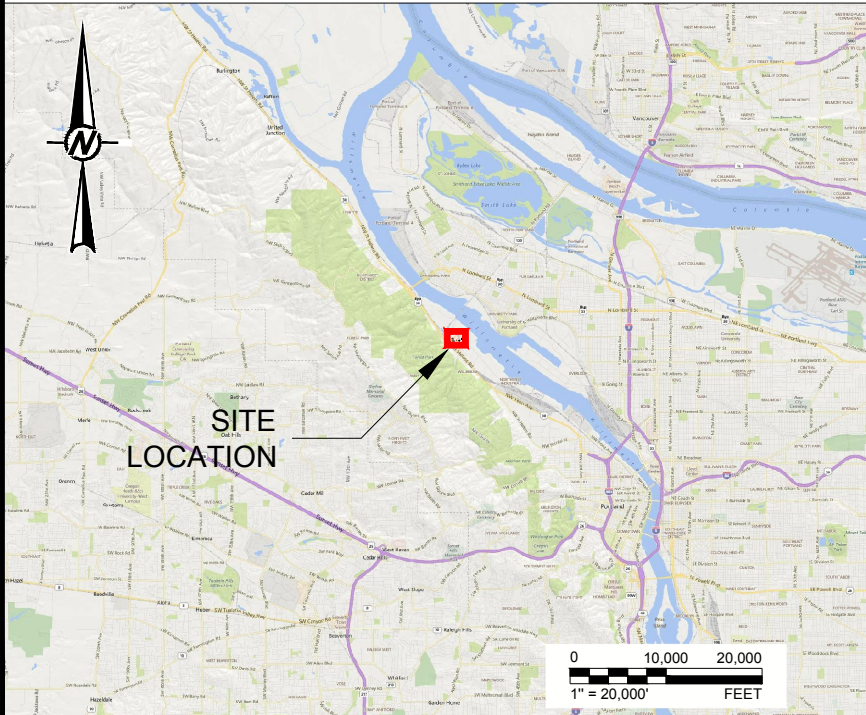
### Site Location Map



**LEGEND**

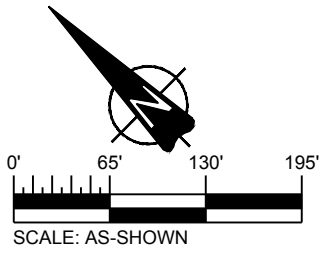
- Property Boundary and Existing Features
- Surface Water Features
- Railroad Tracks
- Storm Sewer (24" to 60")
- Gould Storm Sewer (18" plastic)
- Gould Site OCF Topographic Lines (feet COPD)
- Concrete Sewer Pipe
- City of Portland Manhole and Identifier
- Gould Storm Sewer Manhole and Identifier
- Stormwater Inlet Box (IB)
- Annual Groundwater Sampling Location
- Monitoring Well and Identifier
- Approximate Cap Drain Locations
- Leak Detection Sump (LDS)
- Leachate Collection Sump
- Gould Property Boundary

COPD = City of Portland Datum



General sewer information and location from [www.portlandmaps.com](http://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:	<b>ATTACHMENT A SITE LOCATION MAP</b>
REPORT:	<b>Post-Closure Inspection Report Gould Superfund Site Portland, Oregon</b>

## **Attachment B**

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### **Gould Superfund Site Post-Closure Inspection Form**


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

Date of Inspection: 11/8/2024 Day of Inspection: Friday Time Started: 12:40 Time Completed: 1:40  
 Weather: Overcast, 55° F  
 Attendees: Ethan Henry  
Alex Krauss

**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
<b>OCF Cover</b>			
Has proper vegetative cover been established?	Y		
Is additional seeding, mulching, or watering needed?	N		
When was mowing last conducted?		May 2024	
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		
<b>Access Roads</b>			
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
<b>Site Security Fences</b>			
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		
<b>Stormwater System</b>			
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 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: NO MH-1: IB-2: MH-2: IB-3: MH-3: MH-4:	
Has erosion occurred in areas other than the OCF?	N		
<b>Leachate Collection System</b>			
Is the general condition of the leachate collection manholes adequate?	Y		
Were manhole lids removed during inspection?	Y		
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= 19.71 DTB= 20.71 LCS-2 DTW= 18.78 DTB= 19.40	
Is the general condition of the leak detection sumps adequate?	Y		
Were sump lids removed during inspection?	Y		
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= Dry DTB= 31.77 LDS-2 DTW= 32.03 DTB= 32.23	too little water to EMP WS-2
<b>Leachate Pretreatment and Removal System</b>			
Is the equalization tank intact and not leaking?	Y		
Is the bermed area intact?	Y		

**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**

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### **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 <sup>1,2</sup>	Volume of Water Transferred to On-Site Tank	Analytical Results EPA Method 6020 <sup>3</sup>	
			Total	Dissolved
	feet	gallons	ug/L	
<b>LDS-1</b>				
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	--	--	--

**Attachment C**  
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**Gould Superfund Site Post-Closure Inspection**

Date	Measured Depth of Water in Sump <sup>1,2</sup>	Volume of Water Transferred to On-Site Tank	Analytical Results EPA Method 6020 <sup>3</sup>	
			Total	Dissolved
	feet	gallons	ug/L	
2Q2022	dry	--	--	--
3Q2022	dry	--	--	--
4Q2022	dry	--	--	--
1Q2023	0.93	18	0.554	0.266
2Q2023	dry	--	--	--
3Q2023	dry	--	--	--
4Q2023	dry	--	--	--
1Q2024	1.13	17	1.27	0.239
2Q2024	dry	--	--	--
3Q2024	dry	--	--	--
4Q2024	dry	--	--	--
<b>LDS-2</b>				
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	--	--	--

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

Date	Measured Depth of Water in Sump <sup>1,2</sup>	Volume of Water Transferred to On-Site Tank	Analytical Results EPA Method 6020 <sup>3</sup>	
			Total	Dissolved
	feet	gallons	ug/L	
2Q2014	dry	--	--	--
3Q2014	dry	--	--	--
4Q2014	dry	--	--	--
1Q2015	dry	--	--	--
2Q2015	dry	--	--	--
3Q2015	dry	--	--	--
4Q2015	dry	--	--	--
1Q2016	dry	--	--	--
2Q2016	dry	--	--	--
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
2Q2024	dry	--	--	--
3Q2024	0.13	water not transferred	NS	NS
4Q2024	0.20	water not transferred	NS	NS

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

Date	Measured Depth of Water in Sump <sup>1,2</sup>	Volume of Water Transferred to On-Site Tank	Analytical Results EPA Method 6020 <sup>3</sup>	
			Total	Dissolved
	feet	gallons	ug/L	

Notes:

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

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

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

<sup>3</sup> 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