



August 28, 2025

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

**Re: Second Quarter 2025 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 Second Quarter 2025 Post-Closure Inspection Report (Report) for the Gould Superfund Site (Site) to the United States Environmental Protection Agency (EPA). The inspection was conducted May 21, 2025.

**Introduction**

The second quarter 2025 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. Crows were observed pecking at and pulling up grass on the cap during the first quarterly inspection. Seeding was performed in April and May 2025 on affected areas and grass is regrowing. No erosion or rills were observed, and vegetation will continue to be monitored for reestablishment. 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

Ponded stormwater was present in the low field and observed flowing into catch basin IB-3; no non-stormwater flow was observed in the stormwater system. 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 May 2024 in accordance with the 2001 Gould Site Operation and Maintenance (O&M) Plan. During the Second-quarter inspection, leachate depths in LCS-1 and LCS-2 were 0.70 ft and 0.71 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 Second quarterly 2025 inspection, LDS-1 and LDS-2 had no recordable water level.

## Groundwater Monitoring

Annual groundwater monitoring was conducted May 21, 2025. Monitoring wells ASW-06, W-03-S, W-04-S, and W-12-S were sampled for total and dissolved lead. Laboratory analytical results are included in Attachment D. Total lead was detected at 0.251 ug/L, 0.405 ug/L, 0.258 ug/L, and 0.350 ug/L in monitoring wells ASW-06, W-03-S, W-04-S, and W-12-S, respectively. Dissolved lead was not detected above the reporting limit of 0.200 ug/L. Lead concentrations in groundwater are well below the 15 ug/L action level established by the Safe Drinking Water Act; EPA cited the action level in the Record of Decision for screening purposes.

The next groundwater monitoring event is scheduled for May 2026.

## 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, and there are no updates to the responses in this quarterly report.

- 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.

- 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.

- 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.

- 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.

- 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.

- 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

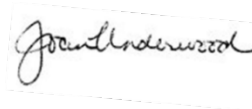
The second quarter 2025 Gould site inspection found the Site to be in good working order. If you have any questions, please contact Ryan Stringfellow at (503) 451-5586 or Joan Underwood at (503) 278-1837.

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

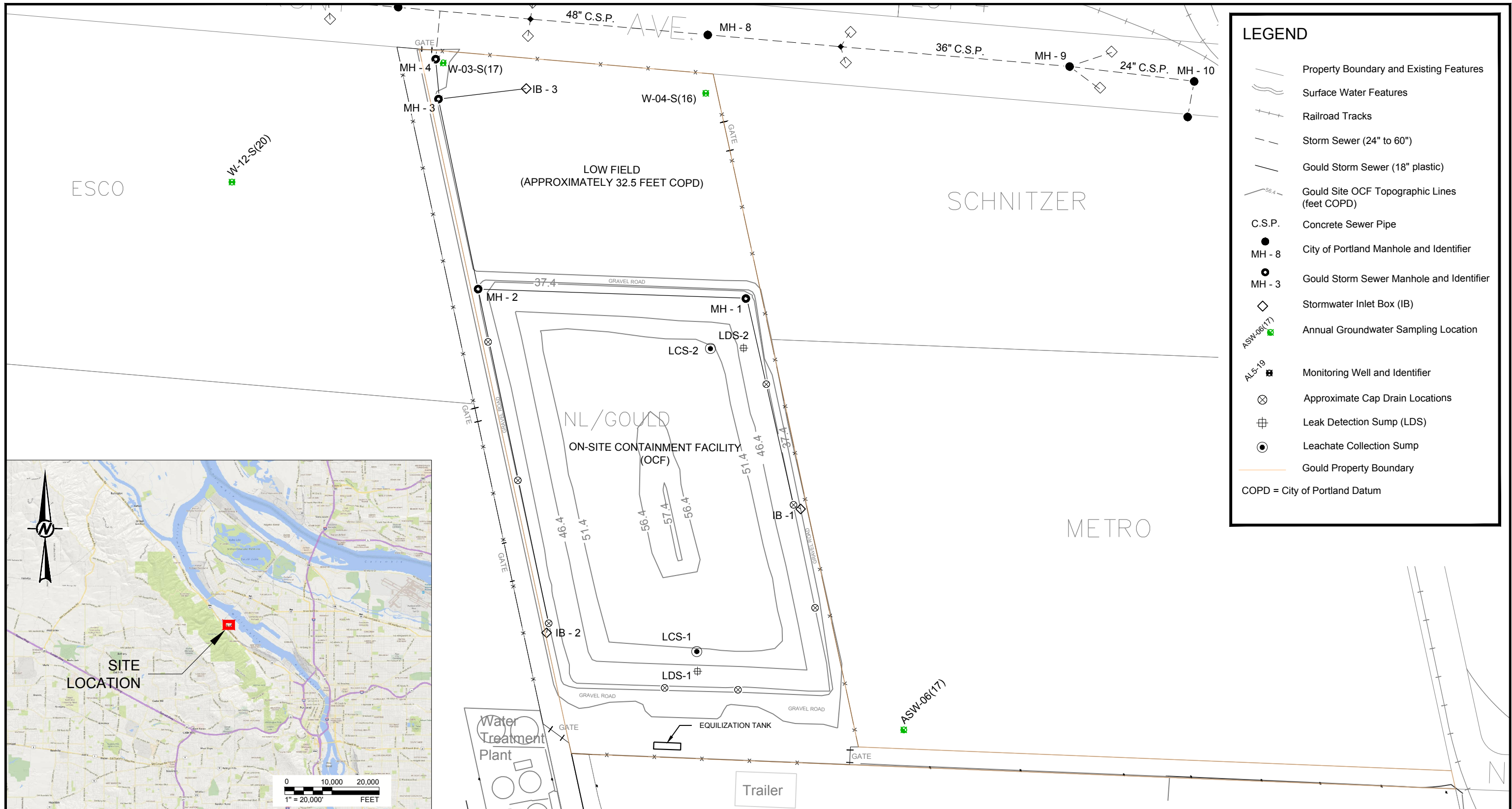
Attachments

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 D: Laboratory Analytical Report  
Attachment E: Photo Table

## Attachment A

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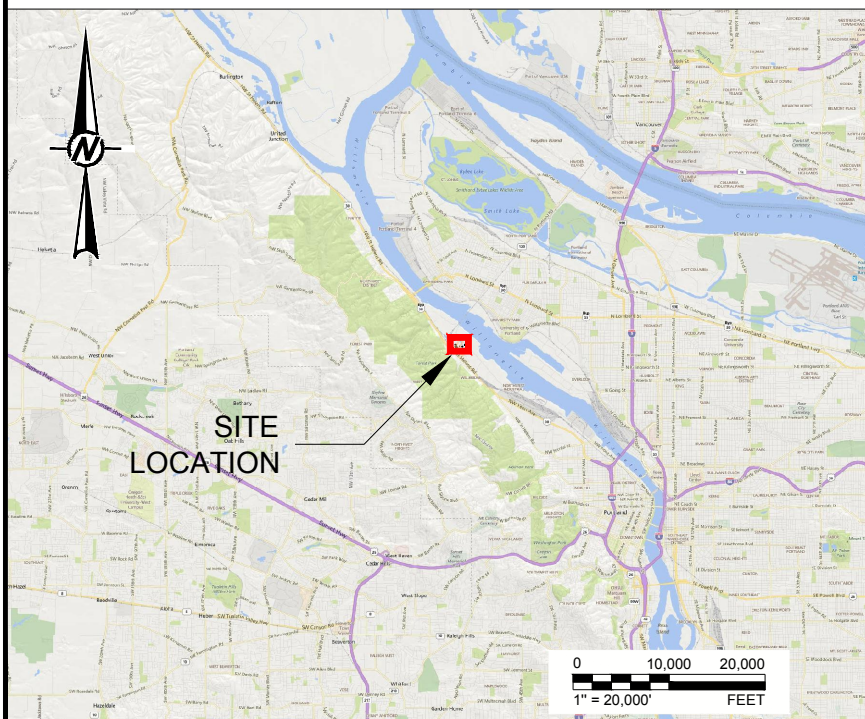
### Site Location Map



**LEGEND**

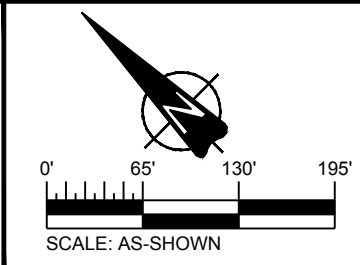
- Property Boundary and Existing Features
- Surface Water Features
- Railroad Tracks
- Storm Sewer (24" to 60")
- Gould Storm Sewer (18" plastic)
- Gould Site OCF Topographic Lines (feet COPD)
- C.S.P. Concrete Sewer Pipe
- MH - 8 City of Portland Manhole and Identifier
- MH - 3 Gould Storm Sewer Manhole and Identifier
- Stormwater Inlet Box (IB)
- Annual Groundwater Sampling Location
- ALS-19 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.



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

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

TITLE:	<b>ATTACHMENT A SITE LOCATION MAP</b>
REPORT:	Post-Closure Inspection Report Gould Superfund Site Portland, Oregon

## **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: 5/21/2025 Day of Inspection: Wed Time Started: 14:30 Time Completed: 15:30  
 Weather: Sunny 60° F  
 Attendees: Ethan Hansen, Ryan Stringfellow

**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	Seeding done April & May, 2025	
When was mowing last conducted?		May 2024	
Have changes in vegetative coverage occurred?	N	Areas of cap affected by crabs have reestablished vegetation	
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: <i>Minor accumulation</i> 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: IB-2: MH-2: IB-3: MH-3: MH-4:	
Has erosion occurred in areas other than the OCF?	<i>N</i>		
<b>Leachate Collection System</b>			
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>14.71</i> DTB= <i>20.41</i> LCS-2      DTW= <i>12.64</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>Dry</i> DTB= <i>31.77</i> LDS-2      DTW= <i>Dry</i> DTB= <i>32.23</i>	
<b>Leachate Pretreatment and Removal System</b>			
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**

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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	--	--	--
2Q2022	dry	--	--	--
3Q2022	dry	--	--	--
4Q2022	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	
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	--	--	--
1Q2025	1.2	20	1.77	0.100 U
2Q2025	dry	--	--	--
<b>LDS-2</b>				
2Q2006	0.75	17	1.00 U	1.00 U
3Q2006	dry	--	--	--
4Q2006	`	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	--	--	--

**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	
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
1Q2025	0.18	2	0.111 J	0.100 U
2Q2025	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	

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

## **Attachment D**

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### **Laboratory Analytical Report**



ANALYTICAL REPORT

AMENDED REPORT

Apex Laboratories, LLC

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

Friday, June 20, 2025
Ryan Stringfellow
BSI America Professional Services Inc.
12950 Worldgate Drive, Suite 800
Herndon, VA 20170

RE: A5E1630 - 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 A5E1630, which was received by the laboratory on 5/22/2025 at 10:10:00AM.

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 2.2 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 (signature)

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**

**AMENDED REPORT**

**Apex Laboratories, LLC**

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

<b>BSI America Professional Services Inc.</b> 12950 Worldgate Drive, Suite 800 Herndon, VA 20170	Project: <b>Gould</b> Project Number: [none] Project Manager: <b>Ryan Stringfellow</b>	<b>Report ID:</b> A5E1630 - 06 20 25 1216
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**ANALYTICAL REPORT FOR SAMPLES**

**SAMPLE INFORMATION**

Client Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
ASW-06	A5E1630-01	Water	05/21/25 09:40	05/22/25 10:10
W-03-S	A5E1630-02	Water	05/21/25 14:10	05/22/25 10:10
W-04-S	A5E1630-03	Water	05/21/25 13:08	05/22/25 10:10
W-12-S	A5E1630-04	Water	05/21/25 10:49	05/22/25 10:10

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

AMENDED REPORT

Apex Laboratories, LLC

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

Table with 3 columns: Client (BSI America Professional Services Inc.), Project (Gould), and Report ID (A5E1630 - 06 20 25 1216)

ANALYTICAL CASE NARRATIVE

A5E1630

Apex Laboratories

Amended Report #1 - This report supersedes all previous reports.

Dissolved Metals by EPA 6020B. Amended Data

This report contains modified data for Lead for the following samples:

- "ASW-06" (Apex Labs ID: A5E1630-01)
"W-03-S" (Apex Labs ID: A5E1630-02)
"W-04-S" (Apex Labs ID: A5E1630-03)
"W-12-S" (Apex Labs ID: A5E1630-04)

Upon laboratory investigation, previous results were biased due to laboratory contamination. The contamination source was corrected and all samples were reprepared and analyzed.

The affected data is flagged in the report with the AMEND qualifier.

Marshall Pattee
Metals Manager
June 20, 2025

Apex Laboratories

Philip Nerenberg (signature)

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**

**AMENDED REPORT**

**Apex Laboratories, LLC**

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

<b>BSI America Professional Services Inc.</b> 12950 Worldgate Drive, Suite 800 Herndon, VA 20170	Project: <b>Gould</b> Project Number: [none] Project Manager: <b>Ryan Stringfellow</b>	<b>Report ID:</b> A5E1630 - 06 20 25 1216
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**ANALYTICAL SAMPLE RESULTS**

**Total Metals by EPA 6020B (ICPMS)**

Analyte	Sample Result	Detection Limit	Reporting Limit	Units	Dilution	Date Analyzed	Method Ref.	Notes	
<b>ASW-06 (A5E1630-01)</b>				<b>Matrix: Water</b>					
Batch: 25F0137									
<b>Lead</b>	<b>0.251</b>	0.110	0.200	ug/L	1	06/04/25 20:48	EPA 6020B		
<b>W-03-S (A5E1630-02)</b>				<b>Matrix: Water</b>					
Batch: 25F0137									
<b>Lead</b>	<b>0.405</b>	0.110	0.200	ug/L	1	06/04/25 20:54	EPA 6020B		
<b>W-04-S (A5E1630-03)</b>				<b>Matrix: Water</b>					
Batch: 25F0137									
<b>Lead</b>	<b>0.258</b>	0.110	0.200	ug/L	1	06/04/25 20:59	EPA 6020B		
<b>W-12-S (A5E1630-04)</b>				<b>Matrix: Water</b>					
Batch: 25F0137									
<b>Lead</b>	<b>0.350</b>	0.110	0.200	ug/L	1	06/04/25 21:05	EPA 6020B		

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Philip Nerenberg, Lab Director

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**AMENDED REPORT**

**Apex Laboratories, LLC**

6700 S.W. Sandburg Street

Tigard, OR 97223

503-718-2323

ORELAP ID: OR100062

<b>BSI America Professional Services Inc.</b> 12950 Worldgate Drive, Suite 800 Herndon, VA 20170	Project: <b>Gould</b> Project Number: [none] Project Manager: <b>Ryan Stringfellow</b>	<b>Report ID:</b> A5E1630 - 06 20 25 1216
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**ANALYTICAL SAMPLE RESULTS**

**Dissolved Metals by EPA 6020B (ICPMS)**

Analyte	Sample Result	Detection Limit	Reporting Limit	Units	Dilution	Date Analyzed	Method Ref.	Notes
<b>ASW-06 (A5E1630-01RE2)</b>				<b>Matrix: Water</b>				
Batch: 25F0349								
Lead	ND	0.100	0.200	ug/L	1	06/11/25 23:57	EPA 6020B (Diss)	AMEND, X
<b>W-03-S (A5E1630-02RE2)</b>				<b>Matrix: Water</b>				
Batch: 25F0349								
Lead	ND	0.100	0.200	ug/L	1	06/12/25 00:08	EPA 6020B (Diss)	AMEND, X
<b>W-04-S (A5E1630-03RE2)</b>				<b>Matrix: Water</b>				
Batch: 25F0349								
Lead	ND	0.100	0.200	ug/L	1	06/12/25 00:19	EPA 6020B (Diss)	AMEND, X
<b>W-12-S (A5E1630-04RE2)</b>				<b>Matrix: Water</b>				
Batch: 25F0349								
Lead	ND	0.100	0.200	ug/L	1	06/12/25 00:24	EPA 6020B (Diss)	AMEND, X

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**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
<b>Batch 25F0137 - EPA 3015A</b>						<b>Water</b>						
<b>Blank (25F0137-BLK1)</b>			Prepared: 06/04/25 13:46 Analyzed: 06/04/25 20:15									
<u>EPA 6020B</u>												
Lead	ND	0.110	0.200	ug/L	1	---	---	---	---	---	---	
<b>LCS (25F0137-BS1)</b>			Prepared: 06/04/25 13:46 Analyzed: 06/04/25 20:21									
<u>EPA 6020B</u>												
Lead	52.0	0.110	0.200	ug/L	1	55.6	---	94	80-120%	---	---	
<b>Duplicate (25F0137-DUP1)</b>			Prepared: 06/04/25 13:46 Analyzed: 06/04/25 21:16									
<u>QC Source Sample: Non-SDG (A5E1690-01)</u>												
Lead	<b>0.495</b>	0.110	0.200	ug/L	1	---	0.411	---	---	18	20%	
<b>Matrix Spike (25F0137-MS1)</b>			Prepared: 06/04/25 13:46 Analyzed: 06/04/25 22:43									
<u>QC Source Sample: Non-SDG (A5E1835-09)</u>												
<u>EPA 6020B</u>												
Lead	52.4	0.110	0.200	ug/L	1	55.6	ND	94	75-125%	---	---	

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**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
<b>Batch 25F0021 - Matrix Matched Direct Inject</b>						<b>Water</b>						
<b>Blank (25F0021-BLK1)</b>			Prepared: 06/02/25 09:21 Analyzed: 06/02/25 19:58									
<u>EPA 6020B (Diss)</u>												
Lead	ND	0.100	0.200	ug/L	1	---	---	---	---	---	---	
<b>LCS (25F0021-BS1)</b>			Prepared: 06/02/25 09:21 Analyzed: 06/02/25 20:03									
<u>EPA 6020B (Diss)</u>												
Lead	58.6	0.100	0.200	ug/L	1	55.6	---	105	80-120%	---	---	
<b>Duplicate (25F0021-DUP1)</b>			Prepared: 06/02/25 09:21 Analyzed: 06/02/25 22:03									
<u>QC Source Sample: W-04-S (A5E1630-03)</u>												
<u>EPA 6020B (Diss)</u>												
Lead	<b>0.590</b>	0.100	0.200	ug/L	1	---	1.08	---	---	<b>58</b>	<b>20%</b>	Q-17
<b>Matrix Spike (25F0021-MS1)</b>			Prepared: 06/02/25 09:21 Analyzed: 06/02/25 22:09									
<u>QC Source Sample: W-04-S (A5E1630-03)</u>												
<u>EPA 6020B (Diss)</u>												
Lead	52.7	0.100	0.200	ug/L	1	55.6	1.08	93	75-125%	---	---	
<b>Batch 25F0137 - EPA 3015A</b>						<b>Water</b>						
<b>Blank (25F0137-BLK1)</b>			Prepared: 06/04/25 13:46 Analyzed: 06/04/25 20:15									
<u>EPA 6020B (Diss)</u>												
Lead	ND	0.100	0.200	ug/L	1	---	---	---	---	---	---	
<b>LCS (25F0137-BS1)</b>			Prepared: 06/04/25 13:46 Analyzed: 06/04/25 20:21									
<u>EPA 6020B (Diss)</u>												
Lead	52.0	0.100	0.200	ug/L	1	55.6	---	94	80-120%	---	---	
<b>Duplicate (25F0137-DUP1)</b>			Prepared: 06/04/25 13:46 Analyzed: 06/04/25 21:16									
<u>QC Source Sample: Non-SDG (A5E1690-01)</u>												
Lead	<b>0.495</b>	0.100	0.200	ug/L	1	---	0.411	---	---	18	20%	A-01
<b>Matrix Spike (25F0137-MS2)</b>			Prepared: 06/04/25 13:46 Analyzed: 06/04/25 22:43									
<u>QC Source Sample: Non-SDG (A5E1835-09RE1)</u>												

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**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
<b>Batch 25F0137 - EPA 3015A</b>						<b>Water</b>						
<b>Matrix Spike (25F0137-MS2)</b>						Prepared: 06/04/25 13:46 Analyzed: 06/04/25 22:43						
<b>QC Source Sample: Non-SDG (A5E1835-09RE1)</b>												
<b>EPA 6020B (Diss)</b>												
Lead	52.4	0.100	0.200	ug/L	1	55.6	ND	94	75-125%	---	---	A-01, A-02

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**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
<b>Batch 25F0349 - EPA 3015A - Dissolved</b>						<b>Water</b>						
<b>Blank (25F0349-BLK1)</b>			Prepared: 06/11/25 16:38 Analyzed: 06/11/25 23:46									
<u>EPA 6020B (Diss)</u>												
Lead	ND	0.100	0.200	ug/L	1	---	---	---	---	---	---	
<b>LCS (25F0349-BS1)</b>			Prepared: 06/11/25 16:38 Analyzed: 06/11/25 23:51									
<u>EPA 6020B (Diss)</u>												
Lead	54.9	0.100	0.200	ug/L	1	55.6	---	99	80-120%	---	---	
<b>Duplicate (25F0349-DUP1)</b>			Prepared: 06/11/25 16:38 Analyzed: 06/12/25 00:02									
<u>QC Source Sample: W-03-S (ASE1630-02RE2)</u>												
<u>EPA 6020B (Diss)</u>												
Lead	ND	0.100	0.200	ug/L	1	---	ND	---	---	---	20%	
<b>Matrix Spike (25F0349-MS1)</b>			Prepared: 06/11/25 16:38 Analyzed: 06/12/25 00:13									
<u>QC Source Sample: W-03-S (ASE1630-02RE2)</u>												
<u>EPA 6020B (Diss)</u>												
Lead	58.1	0.100	0.200	ug/L	1	55.6	ND	105	75-125%	---	---	

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**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: 25F0137</u>							
A5E1630-01	Water	EPA 6020B	05/21/25 09:40	06/04/25 13:46	45mL/50mL	45mL/50mL	1.00
A5E1630-02	Water	EPA 6020B	05/21/25 14:10	06/04/25 13:46	45mL/50mL	45mL/50mL	1.00
A5E1630-03	Water	EPA 6020B	05/21/25 13:08	06/04/25 13:46	45mL/50mL	45mL/50mL	1.00
A5E1630-04	Water	EPA 6020B	05/21/25 10:49	06/04/25 13:46	45mL/50mL	45mL/50mL	1.00

Dissolved Metals by EPA 6020B (ICPMS)

Prep: EPA 3015A - Dissolved

Lab Number	Matrix	Method	Sampled	Prepared	Sample Initial/Final	Default Initial/Final	RL Prep Factor
<u>Batch: 25F0349</u>							
A5E1630-01RE2	Water	EPA 6020B (Diss)	05/21/25 09:40	06/11/25 16:38	45mL/50mL	45mL/50mL	1.00
A5E1630-02RE2	Water	EPA 6020B (Diss)	05/21/25 14:10	06/11/25 16:38	45mL/50mL	45mL/50mL	1.00
A5E1630-03RE2	Water	EPA 6020B (Diss)	05/21/25 13:08	06/11/25 16:38	45mL/50mL	45mL/50mL	1.00
A5E1630-04RE2	Water	EPA 6020B (Diss)	05/21/25 10:49	06/11/25 16:38	45mL/50mL	45mL/50mL	1.00

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**QUALIFIER DEFINITIONS**

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

**Apex Laboratories**

- A-01** Sample was not filtered. Not reportable as a "Dissolved" value.
- A-02** 25E0137-MS2 Dissolved data is reuploaded from 25E0137-MS1 Total data in batch 25F0137.
- AMEND** The Result, Reporting Level, Recovery and/or RPD has changed. Note: Batch QC marked as AMENDED may or may not have been issued prior to the change. Case Narrative included if client data is affected.
- Q-17** RPD between original and duplicate sample, or spike duplicates, is outside of established control limits.
- X** See Case Narrative.

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**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)**

Validated 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 and Detection Limits: Default Limits**

Default Reporting and Detection Limits are based on 100% dry weight with the minimum dilution for the analysis. Reporting and Detection Limits are raised due to moisture content, additional dilutions required for analysis, matrix interferences and in other cases, as necessary.

**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).

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**REPORTING NOTES AND CONVENTIONS (Cont.):**

**Blanks:**

Standard practice is to evaluate the results from Blank QC Samples down to a level equal to one half of the Reporting Limit (RL). Blank results for gravimetric analyses are evaluated to the Reporting Level, not to half of the Reporting Level.

- 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.

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Philip Nerenberg, Lab Director



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**Decanted Samples:**

Soils/Sediments:

Unless TCLP analysis is required or there is notification otherwise for a specific project, all Soil and Sediments containing excess water are decanted prior to analysis in order to provide the most representative sample for analysis.

Water Samples:

Water samples containing solids and sediment may need to be decanted in order to eliminate these particulates from the water extractions. In the case of organics extractions, a solvent rinse of the container will not be performed.

Volatiles Soils (5035s)

Samples that are field preserved by 5035 for volatiles are dry weight corrected using the same dry weight correction as for normal analyses. In the case of decanted samples, the dry weight may be performed on a decanted sample, while the aliquot for 5035 may not have been treated the same way. If this is a concern, please submit separate containers for dry weight analysis for volatiles can be provided.

All samples decanted in the laboratory are noted in this report with the DCNT qualifier indicating the sample was decanted.

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**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
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All reported analytes are included in Apex Laboratories' current ORELAP scope.

**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.

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503-718-2323  
ORELAP ID: OR100062

<b>BSI America Professional Services Inc.</b> 12950 Worldgate Drive, Suite 800 Herndon, VA 20170	Project: <b>Gould</b> Project Number: [none] Project Manager: <b>Ryan Stringfellow</b>	<b>Report ID:</b> A5E1630 - 06 20 25 1216
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**APEX LABS**  
6700 SW Sandburg St, Tigard, OR 97223 Ph: 503-718-2323 Fax: 503-718-0333

**CHAIN OF CUSTODY**

Lab # A5E1630      COC 1 of 1

Company: BSI America Professional Services Inc	Project Name: Gould	Project #/PO#				
Address: 6700 SW Sandburg St, Tigard, OR 97223	Project Mgr: Ryan Stringfellow	Phone: (361) 601-4386	Email: ryan.stringfellow@bsigroup.com			
Sampled by: E. Hense / R. Stringfellow		Fax:				
<b>ANALYSIS REQUEST</b>						
SAMPLE ID	LAB ID #	DATE	Time	MATRIX	# OF CONTAINERS	6020 - Pb total and dissolved
ASW-06		5/21/2025	09:40	W	2	X
W-03-S		5/21/2025	14:10	W	2	X
W-04-S		5/21/2025	13:08	W	2	X
W-12-S		5/21/2025	10:49	W	2	X
SPECIAL INSTRUCTIONS: Dissolved samples were field filtered.						
Normal Turn Around Time (TAT) 10 Business Days						
<b>TAT Requested (circle)</b> 1 DAY    2 DAY    3 DAY    4 DAY    5 DAY    Other: _____						
<b>RECEIVED BY:</b> Signature: <i>[Signature]</i> Date: 5/22/25 Printed Name: E. Hense      Time: 1010 Company: BSI			<b>RECEIVED BY:</b> Signature: <i>[Signature]</i> Date: Printed Name:      Time: Company:			
<b>RECEIVED BY:</b> Signature: <i>[Signature]</i> Date: Printed Name: E. Hense      Time: Company: BSI			<b>RECEIVED BY:</b> Signature: <i>[Signature]</i> Date: Printed Name:      Time: Company:			

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.



ANALYTICAL REPORT

AMENDED REPORT

Apex Laboratories, LLC

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

BSI America Professional Services Inc.
12950 Worldgate Drive, Suite 800
Herndon, VA 20170
Project: Gould
Project Number: [none]
Project Manager: Ryan Stringfellow
Report ID: A5E1630 - 06 20 25 1216

APEX LABS COOLER RECEIPT FORM

Client: BSI America Professional Services Inc. Element WO#: A5E1630

Project/Project #: Gould

Delivery Info: Date/time received: 5/22/25 @ 1010 By: EST

Delivered by: Apex Client ESS FedEx UPS Radio Morgan SDS Evergreen Other

From USDA Regulated Origin? Yes No X

Cooler Inspection Date/time inspected: 5/22/25 @ 1057 By: EST

Chain of Custody included? Yes X No

Signed/dated by client? Yes X No

Contains USDA Reg. Soils? Yes No X Unsure (email RegSoils)

Table with 7 columns: Cooler #1 to Cooler #7. Rows include Temperature (2.2), Custody seals (N), Received on ice (Y), Temp. blanks (Y), Ice type (Gel), Condition (In/Out: In).

Cooler out of temp? (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: 5/22/25 @ 1210 By: JA

All samples intact? Yes X No Comments:

Bottle labels/COCs agree? Yes No X Comments: Cont. date reads 5/20/25 for ASW-06, W-04-S & W-125.

COC/container discrepancies form initiated? Yes No X

Containers/volumes received appropriate for analysis? Yes X No Comments:

Do VOA vials have visible headspace? Yes No NA X

Comments:

Water samples: pH checked: Yes X No NA pH appropriate? Yes X No NA pH ID: A23192

Comments:

Labeled by: JA Witness: [Signature] Cooler Inspected by: EST

Form Y-003 R-02

Philip Nerenberg (Signature)

## Attachment E

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### Photo Table

**Attachment E**  
Post Closure Inspection Report  
Gould Superfund Site

Photo Table



Photo I: View of vegetative cover recovering from crow damage looking Southwest from LCS-2.

Date: 05/21/2025