



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

April 3, 2026

James Cronmiller
Gould Electronics Inc
2555 W. Fairview, Suite 103
Chandler, AZ 85224

Via Email

Subject: First Quarter 2026 Post-Closure Inspection Report
Gould Superfund Site
ECSI #49

Dear Mr. Cornmiller:

The Oregon Department of Environmental Quality (DEQ) received the April 1, 2026 *RE: Gould Superfund Site-First Quarter 2026 Post-Closure Inspection Report*. Our review comments are presented below.

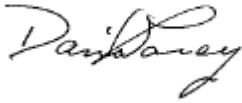
EPA's Sixth Five-Year ROD Review for the Gould Superfund Site identified the following six recommendations.

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.
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.
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.
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.
5. The PRPs need to complete the off-site wetland mitigation required as part of the remedy.
6. The PRPs should continue to update the information repository as needed.

April 3, 2026

The request to report observations of ponded water is directed to the low field area where ponding has occurred as a result of the City Stormwater Basin Outfall 22B system lining completed by StarLink to address contaminated groundwater infiltration. This information was last reported in the Second Quarter 2025 Post Closure Inspection Report. DEQ requests this information provided and that future reports present the required information. Please feel free to contact me at 503 229-5354 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "David Lacey".

David Lacey,
Project Manager
DEQ NWR Cleanup Program

*eC: Laura Hanna, EPA
Joan Underwood, Quantum Management Group
Ryan Stringfellow, Quantum Management Group
ECSI #49*

