

August 2020

In our ongoing effort to inform tenants about the [Goodfellow Environmental Project](#), the following provides recent updates on the [Goodfellow Federal Center](#).

Recent sampling results

Campus-wide air sampling

In June 2020, 178 air samples were collected throughout 17 buildings at the complex. The testing was part of GSA's periodic sampling for airborne levels of heavy metals by taking air samples inside tenant spaces at least twice a year. Samples were analyzed for seven heavy metals: arsenic, barium, cadmium, chromium, lead, selenium, and silver, resulting in 1,246 data points. **All but 7 results were below the reporting limits of the analytical method.** The 7 samples resulted in airborne lead concentrations between 0.44 and 0.54 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). GSA Region 6 uses 1.0 $\mu\text{g}/\text{m}^3$ of air as its action level, which conforms to [World Health Organization guidelines](#). Since these 7 results were below the action level, no further action is being taken at this time. The full sampling reports are available at gsa.gov/goodfellowreadingroom.



Campus-wide wipe sampling

In June 2020, 178 wipe samples were collected throughout 17 buildings at the complex. Samples were analyzed for seven target metals: arsenic, barium, cadmium, chromium, lead, selenium, and silver, resulting in 1,246 data points. Seventeen percent of the total data points had levels above the reporting limit for the analytical method: 8 of arsenic; 93 of barium; 12 of cadmium; 39 of chromium; 63 of lead, 2 of silver and none of selenium. Although some OSHA standards contain housekeeping provisions which address the issue of surface contamination, there are currently no OSHA surface contamination criteria. Instead, a rigorous housekeeping program is necessary to ensure surface contamination is kept to a minimum. GSA has followed the [Brookhaven National Laboratory's guidelines \(Attachment 9.3\)](#) for surface contamination criteria. **The samples with detectable arsenic, cadmium, and chromium were all below these criteria.** Brookhaven does not provide guidance on surface levels for barium or silver. The full sampling reports are available at gsa.gov/goodfellowreadingroom. The sampling data demonstrate that the enhanced cleaning program being performed is one of the effective methods in managing the settled dust.

GSA Region 6 follows the [HUD lead guidelines](#). Of the 63 samples that had detectable levels of lead, **28 exceeded the HUD action level** of 10 micrograms of lead per square foot ($\mu\text{g}/\text{ft}^2$). Fifty-four percent of the samples came from unoccupied, mechanical spaces, and areas accessed by facility personnel:

- Six of the samples came from unoccupied space in Buildings 102E, 104, 104, 105F, 105L, and 110. The sample results ranged from 13-200 $\mu\text{g}/\text{ft}^2$ of lead.
- Nine of the samples came from mechanical space or areas accessed by facility personnel in Buildings 104E, 104F, 107, 110, and 115. The sample results ranged from 15-180 $\mu\text{g}/\text{ft}^2$ of lead.
- Five of the samples came from common area space.
 - A sample taken from the floor near a stairwell in the 2nd Floor south lobby of Building 103E had 22 $\mu\text{g}/\text{ft}^2$ of lead.
 - A sample taken from the threshold (floor) of a 2nd Floor freight elevator at B45 in Building 104 had 42 $\mu\text{g}/\text{ft}^2$ of lead.
 - A sample taken from a threshold (floor) of a 2nd Floor freight elevator at B17 in Building 104 had 27 $\mu\text{g}/\text{ft}^2$ of lead.
 - A sample taken from a threshold (floor) of a 1st Floor freight elevator at B16 in Building 105 had 19 $\mu\text{g}/\text{ft}^2$ of lead.
 - A sample taken from the hallway floor outside Room 134 in Building 107 had 15 $\mu\text{g}/\text{ft}^2$ of lead.
- Eight of the samples came from tenant-occupied space that is not routinely cleaned.
 - A sample taken from the threshold (floor) of a 1st Floor elevator at B12 in secure space of Building 103 had 56 $\mu\text{g}/\text{ft}^2$ of lead.
 - A sample taken from the top of a cabinet in a 2nd Floor break room of Building 104E had 12 $\mu\text{g}/\text{ft}^2$ of lead.
 - A sample taken from a tenant-owned shelf in a 1st Floor warehouse at E47 of Building 105 had 19 $\mu\text{g}/\text{ft}^2$ of lead.
 - Two samples taken from the floor in a 1st Floor warehouse at H46 and H48 of Building 105 had 62 and 63 $\mu\text{g}/\text{ft}^2$ of lead.
 - A sample taken from the floor in a 2nd Floor lab (gas storage) at C44 of Building 105 had 34 $\mu\text{g}/\text{ft}^2$ of lead.
 - A sample taken from a tenant-owned shelf in the southwest corner of the 1st Floor in Building 105E had 56 $\mu\text{g}/\text{ft}^2$ of lead.
 - A sample taken from the concrete floor in the center of Building 141C had 14 $\mu\text{g}/\text{ft}^2$ of lead.

GSA will place sticky mats at entrances and exits, and require shoe covers, in mechanical space (not otherwise specified, such as closets). This is to control potential tracking of settled dust from areas not occupied or regularly cleaned to other areas. For results that came from space that is accessible to tenants and controlled by GSA, GSA is working with the janitorial contractor to reclean and will continue monitoring. For the results that came from tenant-owned property or spaces, GSA will notify the tenant, so they can take further action to prevent the spread of contaminants within their space.

Changes to the reading room

GSA recently reviewed documents contained in the reading room to protect critical infrastructure information within the reports. Where appropriate, reports for the years 2016-2020 have been replaced with versions containing redactions of controlled unclassified (CUI), sensitive but unclassified, and for official use only information. While we are unable to make unredacted CUI publicly available in the online reading room, we can arrange access to the CUI for individuals who have a need to know. You can email r6environmental@gsa.gov to request this access. By Aug. 24, GSA expects to publish redacted versions of reports from 2015 and prior. In the intervening time, if you need access to specific reports from 2015 or prior, please email r6environmental@gsa.gov.

GSA OIG implementation review

On July 24, 2020, the GSA Office of Inspector General's (OIG) Office of Audits published its [implementation review](#) of GSA's corrective action plan for [Report Number A170027](#). The implementation review determined that the PBS Heartland Region did not fully and effectively implement a corrective action for one recommendation.

GSA OIG found that the PBS Heartland Region's communication process does not ensure all occupants are notified of the results of all environmental studies upon completion, specifically because:

- PBS Heartland Region's March 6, 2020, process states, "Most environmental studies and reports for Region 6 are related to exterior soil and groundwater investigations Results of these studies are typically not disclosed to or provided to building tenants as they are exterior and most often do not impact tenant-occupied areas."
- In reviewing documents, the GSA OIG found an annual occupational safety survey finalized in September 2019 with identified hazards related to asbestos, lead, and air quality/carbon monoxide, which was communicated to tenant contacts in February 2020.

The PBS Heartland Region has posted all previous soil and groundwater tests in the Goodfellow physical and online reading rooms and will continue to do so. Regarding the environmental studies and reports related to exterior soil and groundwater investigations, our current process states that, "If a study or report finds that an applicable standard has been exceeded in a tenant space or resource, they will be notified of the results of the risk or hazard present." We expect to contract for future exterior soil and groundwater investigations as part of the [CERCLA](#) process. The PBS Heartland Region is working with PBS Central Office to determine if the notification process for results of future exterior soil and groundwater investigations will be amended.

In regards to sharing occupational safety survey results, PBS is currently in the process of developing a national occupant notification policy for annual occupational safety surveys to clarify what findings in the annual occupational safety survey will be shared with building occupants. The Implementation Review cited "identified hazards related to asbestos, lead, and air quality/carbon monoxide" in the 2019 Goodfellow annual occupational safety survey. The PBS St. Louis West Field Office addressed those findings as follows:

- The asbestos issue was loose floor tiles in an electrical closet. An abatement plan was immediately developed and the floor tiles removed.
- The lead hazard referenced was related to an area where a tenant was conducting file cleaning activities. A misplaced "Lead Hazard" danger sign was placed by a tenant on a fire exit door instead of the temporary wall enclosing the lead abatement area. The sign inadvertently closed off a required exit. The sign was relocated and later removed at the completion of the project.
- The carbon monoxide issue referenced was related to two air handlers located on a loading dock inside the building where gasoline/diesel-fueled vehicles and equipment were being operated and stored. Because the air handlers were part of the space, the potential for supplying carbon-monoxide contaminated air to building occupants existed. This dock is utilized solely by the GSA janitorial and maintenance contractors. They were immediately notified by GSA to not operate or store gasoline-fueled vehicles or equipment in this area.

GSA PBS will provide a revised corrective action plan to the OIG that will address PBS's national policy on notifying building occupants of hazard findings and regional controls for implementation.

Completion of over 70" high cleaning

In March 2020, less than two percent of GSA's wipe samples — primarily taken from areas on the floor and from surfaces higher than 70 inches — indicated levels of lead in settled dust at or above GSA's internal action limit of 10 micrograms per square foot ($\mu\text{g}/\text{ft}^2$).

GSA Region 6 evaluates its sampling results of lead in settled dust and takes action, such as recleaning and resampling the area, when the sample result is 10 $\mu\text{g}/\text{ft}^2$ or above.

GSA completed a one-time cleaning of horizontal surfaces above 70 inches in tenant areas that were not included in regular custodial services. Even though the high cleaning is complete, out of an abundance of caution, we still advise that you avoid touching surfaces above 70 inches high without protection. Contact your agency health and safety personnel prior to access.

Completion of Building 105 and Building 110 basement exhaust projects

In February 2019, GSA completed the [NIOSH](#)-recommended project in Building 103 to maintain negative air pressure in the basements and tunnels as an added measure to prevent contaminants from migrating into the buildings above. At the conclusion of that project, an air pressure test revealed that further action was required to achieve proper negative air pressure in Buildings 105, 105E and 105F and 110. Subsequently, two additional projects to add fans, eliminate air leaks, and adjust heating, ventilation, and air conditioning (HVAC controls) were generated. The fan project in Building 110 was substantially completed May 2, 2020. The remaining project to eliminate air leaks and adjust the HVAC system in Building 105 was completed in July 2020.

Formal decision to dispose of Goodfellow Federal Center

GSA declared the Goodfellow Federal Center excess to GSA's needs, based on its cost-of-ownership analysis. Declaring the facility as excess is the first formal step in the process that will see the federal government dispose of the asset. The entire [disposal process](#) for this asset will take about 5 years. If you have questions or need additional information, feel free to contact GSA's [St. Louis West Field Office](#), your GSA [regional client executive or account manager](#), or email goodfellow@gsa.gov.

GSA Region 6 Environmental Team
gsa.gov/goodfellow | [Online Reading Room](#)