

February 23, 2017

TO: William McDonald
Director, St. Louis Area Office
Occupational Safety and Health Administration

SUBJECT: Progress Report – OSHA Inspection Number 1120691

(b) (6)

FROM: Kevin Rothmier
Acting Regional Commissioner, Public Building Service (6P)
General Services Administration

1) This report is in response to the OSHA requirement to provide periodic progress reports per the approval letter sent by your office on July 26, 2016 for the GSA Petition for Modification of Abatement for Citation 1, Item Numbers 1a, 1b, 2, and 4.

2) The project to correct the elevator equipment guarding deficiencies listed in item numbers 1a, 1b, and 2. GSA obtained funding and generated a project (Project Number RMO22596 - \$40,000) to correct the deficiencies that was scheduled to start in August, 2016 and be completed by February 15, 2017. However, the strict control measures put in place to protect Goodfellow Federal Center occupants from the heavy metal contamination confirmed by your office has unexpectedly slowed progress on this project.

GSA requires all contractors to assess the contaminated spaces they will perform work in and provide GSA with a site specific safety plan. The plan must contain the procedures and personal protective equipment they will use to provide for the safety of their employees while protecting the Goodfellow Federal Center occupants from any crossover contamination while they accomplish their work. Many of the contractors we hired to perform work at Goodfellow over the past year have not been immediately equipped to perform an assessment on this type of situation and deal with the contamination issues. Because performing work in a contaminated environment has been so far out of the mainstream for most of our contractors, we have discovered it takes several months for them to get up to speed. It has been particularly difficult in small niche industries such as the elevator industry.

We contracted with Otis Elevator Company to custom build the elevator equipment guarding to protect the equipment at Goodfellow back in October, 2016. We have worked with them since then to get an acceptable site specific safety plan so the work can be completed safely. The Otis Goodfellow Site Specific Safety Plan was accepted on February 2, 2017 and the equipment guarding project started on February 21, 2017. The project is scheduled to be completed by March 3, 2017 with final inspection April 3-4, 2017.

3) The project to correct the contamination issue listed in Citation 1, Item 4 is much more complex than the elevator equipment guarding issue. Over the past 6 months, GSA has diligently worked to address the contamination on multiple fronts. First and foremost, communication of the hazard to all GSA, tenant, and contractor stakeholders has taken place. In an effort to become completely transparent and disclose all information concerning this issue, GSA opened a public web site at <https://www.gsa.gov/portal/content/212361>. GSA posts all pertinent information to this site once it becomes available. The information posted includes the OSHA citations, NIOSH reports, environmental assessment reports with sampling data (past and present), and information on the current cleanup efforts. In addition, periodic communiques to update federal complex personnel of the actions GSA is taking to fully investigate, characterize, and remediate the contamination are posted once they have been e-mailed to all campus personnel.

Once this issue became readily apparent, GSA set out to protect federal center personnel from any further exposure to the contamination. A formal site specific safety plan was developed that includes control measures to manage the contamination in place until it can properly addressed. All the contractors working at Goodfellow were notified and their contracts were amended to incorporate the requirement to develop a proper safety plan to not only protect their employees, but to protect the safety of all personnel on site as they accomplish their work. Contractors are not allowed to work on site until they have a site specific safety plan vetted through our regional safety and health specialists and accepted by the GSA project contracting officer. To date, our safety and health specialists have reviewed multiple iterations of 75 plans for a variety of projects (see attached Excel spreadsheet). In addition, GSA has contracted with the Kansas City based Occu-Tec to provide an industrial hygienist on site three days a week for consultation and to evaluate contractor performance for quality assurance.

In conjunction with the communications and contamination control/management aspects of our response, GSA has spent the last six months working on abatement. GSA is currently in the process of cleaning up the most impacted occupied area, the Building 104 VA Records Center. GSA completed a project to clean the Building 104 VA

Offices (north end of building) in August, 2016. To date, the VA Records Center offices have been cleaned (clearance sampling data attached). Cleaning of the records storage area started in January, 2017 and will continue throughout the year. GSA has also contracted for the cleaning of the HVAC system serving the north offices of the records center. That project started in August 2016 and will continue through this summer. To ensure the occupied areas remain unaffected by the contaminants, GSA has contracted with the janitorial service on site to provide enhanced cleaning. Enhanced janitorial services includes using HEPA vacuums, wet wipe methods, and increased frequency of cleaning campus wide. In addition, GSA is conducting periodic air and water sampling to ensure the safety of complex personnel is properly monitored. The first round of sampling reports are posted on our public web site.

Finally, GSA is in the process of developing a remediation plan with the associated costs for the rest of the complex. GSA has contracted with Terracon Consultants Inc. and received the first draft plan February 10, 2017. It is in the review process. Once the plan is finalized, we will submit the funding requests.

If you have any questions or need further information, please let me know. Thank you for your consideration in this matter.