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

SUBJECT: Progress Report – OSHA Inspection Number 1120691

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. This report covers the progress made at the Goodfellow Federal Center over the past six months.

2) The project to correct the elevator equipment guarding deficiencies listed in item numbers 1a, 1b, and 2 continues. GSA obtained funding and generated a project (Project Number RM022596 - $40,000) to correct the deficiencies. Due to delays in obtaining an acceptable Site Specific Safety Plan that accounted for the heavy metal contamination in the elevator equipment spaces, the project finally started in April, 2017. The elevator contractor, working from a performance based contract, custom fabricated and installed guarding on the equipment. However, upon inspection we found the guarding to be inadequate. We have notified the contractor of the issues and reengaged them but it will take additional time. We requested an extension until July 31, 2017.

3) The project to correct the contamination issue listed in Citation 1, Item 4 also continues. Over the past 6 months, GSA has continued to address the contamination on multiple fronts. Since our last report, we have contracted with OCCU-TEC, a Kansas City based firm, to provide an industrial hygienist on site three days a week. Their duties include providing no-notice quality control checks to ensure contractors are following their site specific safety plans; provide on-site assistance with planning and support to GSA and other federal center tenant agencies; and to conduct air, water, and wipe sampling as required. OCCU-TEC has been contracted to complete another round of air, wipe, and water sampling by August, 2017.

We have continued to maintain open communications with all the tenants. We continue to post pertinent information to our public information site at
In addition, in June we posted another update for federal complex personnel. GSA is still in the process of cleaning up the most impacted occupied area, the Building 104 VA Records Center. Cleaning of the records storage area started in January, 2017 and will continue throughout the year. GSA has continued with the enhanced janitorial service on site and a recent review indicated the measures taken are effective. The sampling due by August, 2017 will be used to confirm that and make any adjustments as necessary.

Finally, our GSA Region 6 Environmental Program Manager has finalized the Environmental Remedial Investigation Report for the Missouri Department of Natural Resources and is in the process of entering into the Oversight Funding Agreement with the State. GSA has contracted with Terracon Consultants Inc. to put together several options and are now awaiting for concurrence from the Office of Management and Budget on a recommended holding strategy for the federal center. Once that decision is made, we can finalize the remediation plans and put them into motion.

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

Kevin Rothmier  
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