

July 18, 2022

Diane Czarnecki Industrial Hygienist Facilities Management Division GSA Public Buildings Service – Heartland Region 2300 Main Street Kansas City, MO 64108

Re: Goodfellow Federal Center

Metals in Settled Dust Sampling – Building 110

Project No. 121244

Dear Ms. Czarnecki:

Thank you for the opportunity to assist the General Services Administration (GSA) with the metals in settled dust sampling investigation of Building 110 located at the Goodfellow Federal Center (GFC) in St. Louis, Missouri. Burns & McDonnell understands that the purpose of the investigation was to provide additional sampling data of existing environmental conditions that are present at GFC that could adversely impact the health and safety of building occupants as well as workers at the facility. The following report summarizes the sample collection activities and the laboratory analytical results of samples submitted.

INTRODUCTION

Per historical use and previous characterization, Burns & McDonnell was contracted to perform settled dust sampling for the analysis of seven (7) of the Resource Conservation and Recovery Act (RCRA) target metals (arsenic, barium, cadmium, chromium, lead, selenium, and silver) from various surfaces within buildings. The purpose of this testing was to further characterize the presence and concentration of target metals in common tenant-occupied areas of the building.

The proposed sampling scheme, the number of samples, the sample distribution and general methodology was developed by GSA and Burns & McDonnell. Specific sample locations were determined by sampling personnel while on-site.

Settled dust wipe sampling at Bldg. 110 was conducted on June 9, 2022 by Jeff Smith of OCCU-TEC.

METALS IN SETTLED DUST SAMPLING

Metals in settled dust sampling was conducted primarily within tenant-occupied areas. Dust wipe sampling was conducted in accordance with ASTM Standard E1728: Standard Practice for Collection of Settled Dust Samples Using Wipe Sampling Methods for Subsequent Lead Determination and ASTM Standard D6966: Standard Practice for Collection of Settled Dust Samples Using Wipe Sampling Methods for Subsequent Determination of Metals. ASTM Standards E1728 and D6966 are consistent with the methodology described in the Housing and



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Urban Development Guidelines-Appendix 13.1 and 40 CFR 745.63. The Brookhaven National Laboratory's Surface Wipe Sampling Procedure (IH75190) was also used as a guideline.

Dust wipe sampling for the target metals was conducted on a variety of representative surfaces that have the potential of being disturbed by building occupants. A representative surface area of approximately one square foot (1 SF) was measured and delineated with plastic templates. The dust wipe samples were collected using dedicated dust wipe cloths meeting ASTM E1792 Standard. Each dust wipe cloth was pre-moistened and individually wrapped. Each sample was collected by wiping in a back and forth "S" pattern over a measured sampling area using a clean, disposable glove. Then, the wipe was folded over itself and the area was wiped again in a direction perpendicular to the first wipe orientation. Then, the wipe folded over itself again and the area was wiped around the perimeter. The wipe sample was then placed into a labeled, clean container. Dust wipe samples were submitted to Environmental Hazards Services, LLC (EHS) in Richmond, Virginia for Inductively Coupled Plasma (ICP) analysis of metals analysis using Environmental Protection Agency (EPA) method SW846 3050B/6010D. EHS is accredited under the American Industrial Hygiene Association (AIHA) Laboratory Accreditation Program (LAP) identification number LAP-100420.

Whereas the Occupational Safety and Health Administration (OSHA) has not established regulatory limits for surface concentrations of metals, the OSHA Technical Manual Section II: Chapter 2 (III.A) describes a method for calculating "housekeeping" standards, as recommended acceptable surface limits. Brookhaven's IH75190 procedure uses the housekeeping standards to derive a lower, "clean area limit" for non-operational areas that can be accessed or contacted without special training or precautions. Burns & McDonnell calculated clean area limits for metals not included in the Brookhaven procedure, specifically barium, chromium (total), selenium and silver. Wipe results were compared to the Brookhaven procedure's clean area limits for each metal.

Results of the dust wipe samples collected from the building indicate that 3 of the 7 samples contained concentrations of target metals above laboratory reporting limits. The following table identifies the range of results for each of the seven metals that were analyzed. Samples with a "<" sign indicate that the results were below the lab's reportable limit.



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Table 1. Summary of Dust Wipe Results

Analyte	Lowest Concentration ^(a) $(\mu g/sq. ft)^{(b)}$	Highest Concentration ^(a) (μg/sq. ft) ^(b)	Clean Area Limit (c) µg/sq. ft (b)
Silver	< 0.5	< 0.5	62
Arsenic	<2.5	<2.5	62
Barium	< 0.5	37.0	3,094
Cadmium	< 0.1	1.4	31
Chromium (Total)	<1.0	13.0	3,094
Lead	< 0.5	41.0	10 ^(d)
Selenium	<2.5	<2.5	1,236

- (a) Samples with a "<" sign indicate that the results were below the laboratory's reporting limit.
- (b) μ g/sq. ft = micrograms per square foot of surface area.
- (c) Clean Area Limit per Brookhaven IH75190=OSHA Housekeeping Limit [[PEL ($\mu g/m^3$) x 10 $m^3/100cm^2$] x 929cm²/sq.ft.] / 15.
- (d) Lead clean area limit: Brookhaven references EPA/HUD limit for floors, set at 10 µg/sq. ft. as of January 2020.

Of the 3 samples that had detectable levels of one or more analytes, 2 of them exceeded the clean area limit.

- 1. A sample taken from the steel work table in the west end of the warehouse had 29 μg/ft² of lead.
- 2. A sample taken from the floor at the entrance to the maintenance office in the warehouse had 41 $\mu g/ft^2$ of lead.

Burns & McDonnell appreciates the opportunity to work with the GSA on this project. Please contact us if you have any questions regarding this report or if we may be of any additional service.

Sincerely,



Matt Shanahan, CHMM Project Manager

Attachments:

Appendix A – Sample Summary Table Appendix B – Laboratory Analysis Report



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Information in Appendices A and B is not accessible for people using screen reader technology. If this information is required, it can be furnished upon request by contacting 816-223-6198 or redenvironmental@gsa.gov.



Appendix A Sample Summary Table

Sample Number	Location	Area Description	Analyte	Result	Units	Clean Area Limit*
110-W-01	Warehouse, break room	Counter near microwave	Arsenic	< 2.5	μg/ft²	62
			Barium	< 0.50	μg/ft²	3,094
			Cadmium	< 0.10	μg/ft²	31
			Chromium	< 1.0	μg/ft²	3,094
			Lead	< 0.50	μg/ft²	10
			Selenium	< 2.5	μg/ft²	1,236
			Silver	< 0.50	μg/ft²	62
110-W-02	Warehouse, break room	Floor by doorway	Arsenic	< 2.5	μg/ft²	62
			Barium	< 0.50	μg/ft²	3,094
			Cadmium	< 0.10	μg/ft²	31
			Chromium	< 1.0	μg/ft²	3,094
			Lead	< 0.50	μg/ft²	10
			Selenium	< 2.5	μg/ft²	1,236
			Silver	< 0.50	μg/ft²	62
110-W-03	ICE JV conference room	Table	Arsenic	< 2.5	μg/ft²	62
			Barium	< 0.50	μg/ft²	3,094
			Cadmium	< 0.10	μg/ft²	31
			Chromium	< 1.0	μg/ft²	3,094
			Lead	< 0.50	μg/ft²	10
			Selenium	< 2.5	μg/ft²	1,236
			Silver	< 0.50	μg/ft²	62
110-W-04	ICE JV conference room	Floor by doorway	Arsenic	< 2.5	μg/ft²	62
			Barium	1.2	μg/ft²	3,094
			Cadmium	< 0.10	μg/ft²	31
			Chromium		μg/ft²	3,094
			Lead	1.1	μg/ft²	10
			Selenium	< 2.5	μg/ft²	1,236
			Silver	< 0.50	μg/ft²	62

Appendix A Sample Summary Table

Sample Number	Location	Area Description	Analyte	Result	Units	Clean Area Limit*
110-W-05	Warehouse, south work area	Steel work table	Arsenic	< 2.5	μg/ft²	62
			Barium	27	μg/ft²	
			Cadmium	1.4	μg/ft²	31
			Chromium	13	μg/ft²	3,094
			Lead	29	μg/ft²	10
			Selenium	< 2.5	μg/ft²	
			Silver	< 0.50	μg/ft²	62
110-W-06	Warehouse, west end	Floor at entrance to ICE JV office	Arsenic	< 2.5	μg/ft²	62
			Barium	37	μg/ft²	
			Cadmium	0.70	μg/ft²	31
			Chromium	10	μg/ft²	3,094
			Lead	41	μg/ft²	10
			Selenium	< 2.5	μg/ft²	1,236
			Silver	< 0.50	μg/ft²	62
110-W-07	Field blank		Arsenic	< 2.50	μg	
			Barium	< 0.500	μg	
			Cadmium	< 0.100	μg	
			Chromium		μg	
			Lead	< 0.500	μg	
				< 2.50	μg	
			Silver	< 0.500	μg	

^{*} Clean Area Limit per Brookhaven IH75190=OSHA Housekeeping Limit [[PEL ($\mu g/m^3$) x 10 $m^3/100cm^2$] x 929cm²/sq. ft.] / 15. Lead clean area limit: Brookhaven references EPA/HUD limit for floors, set at 10 $\mu g/sq$. ft. as of January 2020.

^{**} Indicates results at or above the Clean Area Limit





Environmental Hazards Services, L.L.C. 7469 Whitepine Rd Richmond, VA 23237

Telephone: 800.347.4010

22-06-03538

Wipe Metals Analysis Report

Burns & McDonnell Engineering **Report Number:** 9400 Ward Pkwy.

Kansas City, MO 64114 Received Date: 06/17/2022 Analyzed Date: 06/25/2022 Reported Date: 06/27/2022

Project/Test Address: 168765; GFC; 4300 Goodfellow Blvd

Client Number:

Client:

Fax Number: Laboratory Results 816-822-3494 26-3514

Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft²)	Total Metal (ug)	Concentration (ug/ft²)	Narrative ID
22-06-03538-001	110-W-01	Arsenic (As)	1.00	<2.50	<2.5	L01
		Barium (Ba)	1.00	<0.500	<0.50	L01
		Cadmium (Cd)	1.00	<0.100	<0.10	L01
		Chromium (Cr)	1.00	<1.00	<1.0	L01
		Lead (Pb)	1.00	<0.500	<0.50	L01
		Selenium (Se)	1.00	<2.50	<2.5	L01
		Silver (Ag)	1.00	<0.500	<0.50	L01
22-06-03538-002	110-W-02	Arsenic (As)	1.00	<2.50	<2.5	L01
		Barium (Ba)	1.00	<0.500	<0.50	L01
		Cadmium (Cd)	1.00	<0.100	<0.10	L01
		Chromium (Cr)	1.00	<1.00	<1.0	L01

Environmental Hazards Services, L.L.C

Client Number:

26-3514

Project/Test Address: 168765; GFC; 4300 Goodfellow Blvd

Report Number:

22-06-03538

Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft²)	Total Metal (ug)	Concentration (ug/ft²)	Narrative ID
		Lead (Pb)	1.00	<0.500	<0.50	L01
		Selenium (Se)	1.00	<2.50	<2.5	L01
		Silver (Ag)	1.00	<0.500	<0.50	L01
22-06-03538-003	110-W-03	Arsenic (As)	1.00	<2.50	<2.5	L01
		Barium (Ba)	1.00	<0.500	<0.50	L01
		Cadmium (Cd)	1.00	<0.100	<0.10	L01
		Chromium (Cr)	1.00	<1.00	<1.0	L01
		Lead (Pb)	1.00	<0.500	<0.50	L01
		Selenium (Se)	1.00	<2.50	<2.5	L01
		Silver (Ag)	1.00	<0.500	<0.50	L01
22-06-03538-004	110-W-04	Arsenic (As)	1.00	<2.50	<2.5	L01
		Barium (Ba)	1.00	1.16	1.2	L01
		Cadmium (Cd)	1.00	<0.100	<0.10	L01
		Chromium (Cr)	1.00	<1.00	<1.0	L01
		Lead (Pb)	1.00	1.10	1.1	L01
		Selenium (Se)	1.00	<2.50	<2.5	L01
		Silver (Ag)	1.00	<0.500	<0.50	L01
22-06-03538-005	110-W-05	Arsenic (As)	1.00	<2.50	<2.5	L01
		Barium (Ba)	1.00	27.2	27	L01

Rev 1.0 (Revised On: 06/27/2022): Added narrative to all samples on report.

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Environmental Hazards Services, L.L.C

Client Number:

26-3514

Project/Test Address: 168765; GFC; 4300 Goodfellow Blvd

Report Number:

22-06-03538

Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft²)	Total Metal (ug)	Concentration (ug/ft²)	Narrative ID
		Cadmium (Cd)	1.00	1.37	1.4	L01
		Chromium (Cr)	1.00	12.6	13	L01
		Lead (Pb)	1.00	29.0	29	L01
		Selenium (Se)	1.00	<2.50	<2.5	L01
		Silver (Ag)	1.00	<0.500	<0.50	L01
22-06-03538-006	110-W-06	Arsenic (As)	1.00	<2.50	<2.5	L01
		Barium (Ba)	1.00	37.1	37	L01
		Cadmium (Cd)	1.00	0.695	0.70	L01
		Chromium (Cr)	1.00	10.4	10	L01
		Lead (Pb)	1.00	41.0	41	L01
		Selenium (Se)	1.00	<2.50	<2.5	L01
		Silver (Ag)	1.00	<0.500	<0.50	L01
22-06-03538-007	110-W-07	Arsenic (As)		<2.50		L01
		Barium (Ba)		<0.500		L01
		Cadmium (Cd)		<0.100		L01
		Chromium (Cr)		<1.00		L01
		Lead (Pb)		<0.500		L01
		Selenium (Se)		<2.50		L01
		Silver (Ag)		<0.500		L01

Rev 1.0 (Revised On: 06/27/2022): Added narrative to all samples on report.

Environmental Hazards Services, L.L.C

Client Number: 26-3514 **Report Number:** 22-06-03538

Project/Test Address: 168765; GFC; 4300 Goodfellow Blvd

Lab Sample Client Sample Analyte: Wipe Area Total Metal Concentration Narrative Number Number (ft²) (ug) (ug/ft²) ID

Sample Narratives:

LO1: LCS and/or LCSD percent recoveries for Se were outside acceptable control limits.

Analyst: Anthony Dee

Method: Mercury (Hg): EPA SW846 7471B

All other metals: EPA SW846 3050B/6010D

Reviewed By Authorized Signatory:

Tasha Eaddy
QA/QC Clerk

Sample Results denoted with a "less than" (<) sign contains less than the reporting limit for each particular metal, based on a 50mL volume. The reporting limit for Cadmium is 0.10ug, Barium, Lead and Silver are 0.50ug, Arsenic and Chromium are 1.0ug, and Selenium is 2.5ug.

The condition of the samples analyzed was acceptable upon receipt per laboratory protocol unless otherwise noted on this report. Results represent the analysis of samples submitted by the client. Unless otherwise noted, samples are reported without a dry weight correction. Sample location, description, area, volume, etc., was provided by the client. If the report does not contain the result for a field blank, it is due to the fact that the client did not include a field blank with their samples. These sample results do not reflect blank correction. This report shall not be reproduced except in full, without the written consent of Environmental Hazards Services, L.L.C. NY ELAP #11714.

Legend ug = microgram $ug/ft^2 = micrograms$ per square foot

mL = milliliter $ft^2 = square foot$

ENVIRONMENTAL HAZARDS SERVICES, LLC

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