

February 8, 2017

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

Petition To Modify Abatement Date

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

RE: OSHA Inspection Number: 1120691

1. On July 1, 2016, the General Services Administration, Goodfellow Federal Center, 4300 Goodfellow Boulevard, St. Louis, Missouri received seven OSHA Notices of Unsafe and Unhealthful Working Conditions in the course of the above referenced inspection. The Notices listed an abatement date of July 25, 2016. Pursuant to OSHA regulation 29 CFR §1903.14a, the General Services Administration, Region 6 submitted a Petition for Modification of Abatement Date. We received an initial modification for the following three citations for February 15, 2017. However, due to unforeseen circumstances, we are requesting a second modification for abatement date of May 31, 2017. We respectfully submit the following information for your consideration:

- **Notice 1 Item 1a: Serious - 29 CFR 1910.219(b)(1) Guarding...Elevator Equipment**

Additional Time Needed To Abate: We respectfully request the abatement date be moved to May 31, 2017. A project to install permanent guards on all the unguarded elevator equipment (including Building 104-B16, 105-B16, 105-B4, and 105F-M36) was funded on July 18, 2016. The equipment guarding project was awarded and scheduled to start in August, 2016. However, in performing our due diligence, we suffered several delays in negotiating an acceptable site specific safety plan with the elevator contractor so their employees are properly protected when working in the areas contaminated with the environmental contaminants that are present. We finally received an acceptable plan on February 2, 2017 and issued the notice to proceed. The project is scheduled to start in the next two weeks barring any more difficulties.

Interim Steps Taken To Protect Employees: All Goodfellow Federal Center elevator equipment areas/rooms with mechanical/electrical guarding issues were secured and placed off limits to all GSA personnel unless all the unguarded equipment in the room/area is properly locked out prior to entry. This has been made policy and incorporated into the Goodfellow Federal Center Site Specific Safety Plan we previously submitted.

- **Notice 1 Item 1b: Serious - 29 CFR 1910.219(e)(3)(i) Guarding ...Elevator Equipment**

Additional Time Needed To Abate: We respectfully request the abatement date be moved to May 31, 2017. A project to install permanent guards on all the unguarded elevator equipment (including Building 104-B16, 105-B16, 105-B4, and 105F-M36) was funded on July 18, 2016. The equipment guarding project was awarded and scheduled to start in August, 2016. However, in performing our due diligence, we suffered several delays in negotiating an acceptable site specific safety plan with the elevator contractor so their employees are properly protected when working in the areas contaminated with the environmental contaminants that are present. We finally received an acceptable plan on February 2, 2017 and issued the notice to proceed. The project is scheduled to start in the next two weeks barring any more difficulties.

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- **Notice 1 Item 2: Serious -29 CFR 1910.303(b)(1) Guarding ...Electrical**

Additional Time Needed To Abate: We respectfully request the abatement date be moved to May 31, 2017. A project to install permanent guards on all the unguarded elevator equipment (including Building 104-B16, 105-B16, 105-B4, and 105F-M36) was funded on July 18, 2016. The equipment guarding project was awarded and scheduled to start in August, 2016. However, in performing our due diligence, we suffered several delays in negotiating an acceptable site specific safety plan with the elevator contractor so their employees are properly protected when working in the areas contaminated with the environmental contaminants that are present. We finally received an acceptable plan on February 2, 2017 and issued the notice to proceed. The project is scheduled to start in the next two weeks barring any more difficulties.

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We appreciate your consideration in this matter.

(b) (6)



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