



July 24, 2018

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 Notice 1, Item 4. This report covers the progress made at the Goodfellow Federal Center over the past six months.
- 2) The project to correct the contamination issue listed in Notice 1, Item 4 is at a standstill pending the final decision from the Office of Management and Budget to move the Federal Center tenants and dispose of the property. However GSA continues to monitor the situation and properly manage the contamination in place.
- 3) Over the past 6 months, GSA has continued to monitor and take the actions necessary to keep GSA employees, tenants, and contractors safe. Since our last report, our contracted industrial hygiene service provider, OCCU-TEC, has been on site three days a week. They continue to provide no-notice quality control checks to ensure contractors are following their site specific safety plans; on-site assistance with planning and support to GSA and other federal center tenant agencies; and conduct air, water, and wipe sampling as required.

Since the last report, GSA conducted air and wipe sampling; here is a summary of the results:

- In April 2018, GSA conducted air and wipe sampling simultaneously with OSHA:
 - 4 air samples - no lead was detected above the analytical reporting limit: Barium and chromium were found at concentrations above the analytical reporting limits, but were less than their respective PELs.

- 4 wipe samples - detectable levels of lead and four other RCRA metals were found above the analytical reporting limits, but less than required for the recommended surface wipe criteria
- In April-May 2018, GSA conducted drinking water sampling in 16 buildings for lead and copper:
 - 132 samples - 3 exceeded the action level for lead; 1 exceeded the action level for copper (3% of samples). Three fixtures were taken out of service immediately until results from sequential sampling were available. The subsequent samples had similar results that were above the action level for lead. Two of the fixtures were replaced and one was permanently removed from service.
- In April 2018, GSA conducted air sampling in 16 buildings for RCRA Metals analysis (except mercury):
 - 198 air samples - eleven samples (5.5%) exceeded the analytical reporting limit for lead, three of which were taken of the ambient air from the roof level. All detected levels of lead were well below the PEL (0.1% to <5% of PEL). Chromium and barium were also found above the analytical reporting limits, but were less than their respective PELs.
 - The ambient air samples collected resulted in lead concentrations ranging from 2% to 20 % of the PEL. The highest level found inside a building was less than 5% of the PEL (2.4 ug/m³)
- In June 2018, construction contractors conducted sampling for lead-based paint in the electrical vaults of Buildings 103, 103F, 105, & 107 as part of their project:
 - 140 samples – Using XRF detection equipment, sampling results verified that lead based paint is on ladders, ladder brackets, door frames door thresholds, I-beams, angle iron, and electrical panels.

Note: Sampling as the result of construction projects showed lead and other heavy metal contamination in the electrical vaults. GSA has amended the requirements for site specific safety plans and updated contracts to reflect the contamination.

- In July 2018, a limited lead-based paint and contaminated dust investigation in the basement of Building 110 was conducted in support of upcoming remodeling activities planned for the area.



- 5 wipe samples were taken and analyzed for seven target metals. 3 of the 5 contained concentrations of lead above the surface criteria guidelines.
- 8 readings were taken on painted surfaces using XRF detection equipment. One sample resulted in confirmation of lead-based paint.

5) GSA has continued to maintain open communications with federal center tenants. GSA posts pertinent information and all testing/sampling results to the public information site at <https://www.gsa.gov/portal/content/212361> . GSA sent out the last communique to tenants in November 2017 and has the next installment drafted, hoping to publish it in the next month or so (hoping to announce GSA's decision to keep/close the center). The Goodfellow project team has completed the Goodfellow Federal Center Community Involvement Plan and is working with the Missouri Department of Natural Resources to move the federal center through the rest of the environmental CERCLA process. Finally, DISA has decided to join the VA and shut down their operations at Goodfellow and move elsewhere by September 2020.

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

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