

July 25, 2016

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

SUBJECT: Petition To Modify Abatement Date

FROM: Allison Azevedo
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 is hereby submitting this Petition for Modification of Abatement Date. 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 1, 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. A project manager has been assigned and the project is currently being developed. Project scope and development, competition to select a contractor, and contract award must be accomplished in accordance with federal acquisition regulations and takes several months complete. The project to install the actual guarding is scheduled to start on August 2, 2016 and be completed on February 15, 2017.

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 (see attached pictures). This has been made policy and incorporated into the Goodfellow Federal Center Site Specific Safety Plan (attached).

- **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 1, 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. A project manager has been assigned and the project is currently being developed. Project scope and development, competition to select a contractor, and contract award must be accomplished in accordance with federal acquisition regulations and takes several months complete. The project to install the actual guarding is scheduled to start on August 2, 2016 and be completed on February 15, 2017.

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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 1, 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. A project manager has been assigned and the project is currently being developed. Project scope and development, competition to select a contractor, and contract award must be accomplished in accordance with federal acquisition regulations and takes several months complete. The project to install the actual guarding is scheduled to start on August 2, 2016 and be completed on February 15, 2017.

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- **Notice 1 Item 4: Serious – 29 CFR 1910.1025(h)(1) - Lead...Housekeeping**

Additional Time Needed To Abate: We respectfully request the abatement date be moved to 25 July, 2018. Approval of GSA's FY 2018 Prospectus (funding) request is necessary for completion of this work. A project to characterize and clean the contaminated space in Building 104, 1st Floor VA Records Center is currently underway. An environmental cleanup contractor (Global Environmental Inc.) has been contracted to develop a remedial action plan. The horizontal surfaces in this space are being cleaned up now. A plan to generate projects to

characterize and clean all affected chiller rooms, mechanical rooms, penthouses, air handling units, stair cases and warehouses in 23 buildings is also being developed. A plan to clean building basements and utility tunnels and remove and/or encapsulate the contaminated soil in the all affected building basement crawlspaces is also being developed.

Interim Steps Taken To Protect Employees: In the meantime, contaminated spaces that have not been cleaned up are restricted with controls in place until they are cleaned up (see attached pictures). GSA has submitted a multi-million dollar funding request to GSA Central Office to permanently address all issues by removing/encapsulating all contaminants. GSA Region 6 will manage the contaminants in place through proper restrictions and controls until funding becomes available to remove/encapsulate the contaminants (see attached Goodfellow Site Specific Safety Plan). As abatement projects occur, clearance sampling will be conducted and the results will be shared/posted as they become available.

We appreciate your consideration in this matter.

(b) (6)

for

GSA Region 6 PBS Commissioner



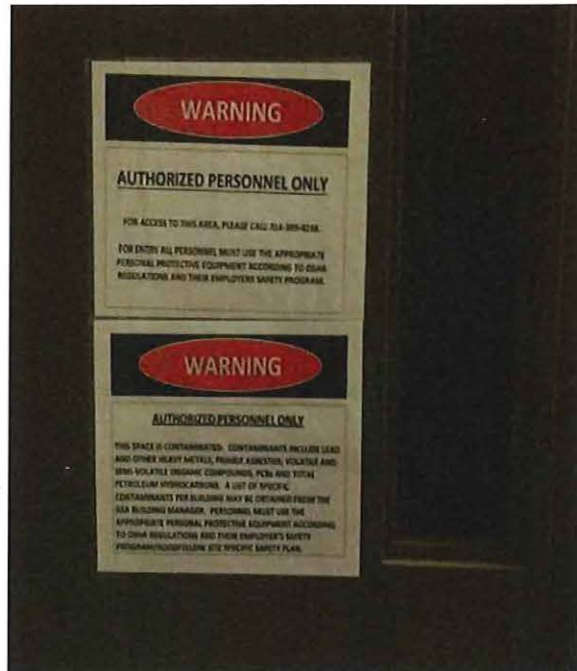
VA Records Room



Elevator Equipment Rooms/Areas



Penthouses



Basements