
February 6, 2025

Diane Czarnecki
Industrial Hygienist
Facilities Management Division
GSA Public Buildings Service - Heartland Region
U.S. General Services Administration
2300 Main Street, Kansas City, MO 64108

**RE: Goodfellow Federal Center
Metals in Settled Dust Sampling – Building 105L
4300 Goodfellow Boulevard
St. Louis, Missouri 63120
OCCU-TEC Project No. 925001**

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 105L located at the Goodfellow Federal Center (GFC), in St. Louis, Missouri. OCCU-TEC, Inc. (OCCU-TEC) 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.

On January 15, 2025, OCCU-TEC personnel, including a Missouri licensed lead risk assessor, conducted settled dust sampling for the presence of seven of the Resource Conservation and Recovery Act (RCRA) target metals (lead, arsenic, barium, cadmium, total chromium, selenium, and silver) from various surfaces within occupied spaces within the building. Surfaces sampled included floors, working surfaces, and surfaces above 70 inches that are not subjected to regular cleaning. The purpose of this testing was to further characterize the presence and concentration of target metals in occupied areas and determine if current cleaning efforts are sufficient to limit the accumulation of surface dust.

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

Metals in Settled Dust Sampling

Metals in settled dust sampling was limited to only those areas within occupied spaces that may be routinely accessed by building personnel. Closed office spaces, mechanical rooms, basements, penthouses, tunnels and other mechanical spaces were not included in the testing.

Dust wipe sampling was conducted in accordance with ASTM Standard E1728/E1728M-24: Standard Practice for Collection of Settled Dust Samples Using Wipe Sampling Methods for Subsequent Lead Determination. ASTM Standard E1728/E1728M-24 is consistent with the methodology described in the Housing and Urban Development Guidelines and 40 CFR 745.63. The Brookhaven National Laboratory's Surface Wipe Sampling Procedure (IH75190) was also used as a guideline.

A representative surface area of approximately one (1) square foot (SF) was measured and delineated with prefabricated, plastic templates which were thoroughly cleaned after each use. The dust wipe samples were collected using dedicated dust wipe cloths meeting ASTM standards. 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. Then, the wipe was folded over itself and the area was wiped again in a direction perpendicular to the first wipe orientation. The wipe samples were then placed into labeled, clean laboratory-supplied plastic centrifuge tubes with screw on caps. 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 350B/7420.

Results of the dust wipe samples collected from the building indicate that six (6) of the seven (7) samples contained concentrations of target metals above laboratory detection 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 reportable limit.**

Analysis	Lowest Concentration (µg/sq. ft.)	Highest Concentration (µg/sq. ft.)	Clean Area Limit (µg/sq. ft.)
Arsenic	<2.50	<2.50	62
Barium	<0.50	15.00	3,094
Cadmium	<0.10	4.10	31
Total Chromium	<1.00	15.00	3,094
Lead	<0.50	93.0	10
Selenium	<2.50	<2.50	1,236
Silver	<0.50	<0.50	62

One (1) of the wipe samples exceeded the Clean Area Limit for lead:

- 105L-W-07 – from a shelf in Room 111 – East Equipment Storage, which resulted in a lead concentration of 93.0 µg/ft².

Based on the results of the sampling, all similar surfaces within the vicinity should be presumed to contain measurable levels of RCRA metals and proper precautions and/or cleaning procedures should be taken upon entry and exit of the subject areas to protect occupants and limit the spread of dust to the outside environment.

OCCU-TEC appreciates the opportunity to work with GSA on this project. If you have any questions concerning this report, or if we may be of any additional service, please feel free to contact us.

Sincerely,

(b) (6)

Jeff T. Smith
Senior Project Manager

(b) (6)

Kevin Heriford
Director of Environmental Health and
Safety (QA/QC)

Appendices:

- A – Sample Summary Table
- B – Laboratory Analysis Report
- C – Professional Accreditation

APPENDIX A – SAMPLE SUMMARY TABLE

Appendix A

Sample Summary Table

Building 105L Wipe Sample Results Summary Table						
Sample Number	Location	Area Description	Analyte	Result	Units	Clean Area Limit*
105L-W-01	Center Hallway	Floor (Carpet)	Arsenic	< 2.50	µg/ft ²	62
			Barium	1.80	µg/ft ²	3,094
			Cadmium	< 0.10	µg/ft ²	31
			Chromium	< 1.00	µg/ft ²	3,094
			Lead	2.12	µg/ft ²	10
			Selenium	< 2.50	µg/ft ²	1,236
			Silver	< 0.50	µg/ft ²	62
105L-W-02	Room 111	Top of Fridge (>70")	Arsenic	< 2.50	µg/ft ²	62
			Barium	1.56	µg/ft ²	3,094
			Cadmium	< 0.18	µg/ft ²	31
			Chromium	< 1.00	µg/ft ²	3,094
			Lead	1.80	µg/ft ²	10
			Selenium	< 2.50	µg/ft ²	1,236
			Silver	< 0.50	µg/ft ²	62
105L-W-03	Room 111 - west side	Work Station	Arsenic	< 2.50	µg/ft ²	62
			Barium	< 0.72	µg/ft ²	3,094
			Cadmium	< 0.10	µg/ft ²	31
			Chromium	< 1.00	µg/ft ²	3,094
			Lead	0.67	µg/ft ²	10
			Selenium	< 2.50	µg/ft ²	1,236
			Silver	< 0.50	µg/ft ²	62
105L-W-04	Room 107	Desk	Arsenic	< 2.50	µg/ft ²	62
			Barium	< 0.50	µg/ft ²	3,094
			Cadmium	< 0.10	µg/ft ²	31
			Chromium	< 1.00	µg/ft ²	3,094
			Lead	< 0.50	µg/ft ²	10
			Selenium	< 2.50	µg/ft ²	1,236
			Silver	< 0.50	µg/ft ²	62

Appendix A

Sample Summary Table

Sample Number	Location	Area Description	Analyte	Result	Units	Clean Area Limit*
105L-W-05	Room 106	Top of Vending machine (>70")	Arsenic	< 2.50	µg/ft ²	62
			Barium	3.90	µg/ft ²	3,094
			Cadmium	< 0.10	µg/ft ²	31
			Chromium	< 1.00	µg/ft ²	3,094
			Lead	2.30	µg/ft ²	10
			Selenium	< 2.50	µg/ft ²	1,236
			Silver	< 0.50	µg/ft ²	62
105L-W-06	Room 106 - south entrance	Floor	Arsenic	< 2.50	µg/ft ²	62
			Barium	0.94	µg/ft ²	3,094
			Cadmium	< 0.10	µg/ft ²	31
			Chromium	< 1.00	µg/ft ²	3,094
			Lead	0.90	µg/ft ²	10
			Selenium	< 2.50	µg/ft ²	1,236
			Silver	< 0.50	µg/ft ²	62
105L-W-07	Room 111 - East Equipment Storage	Shelf	Arsenic	< 2.50	µg/ft ²	62
			Barium	15.00	µg/ft ²	3,094
			Cadmium	4.10	µg/ft ²	31
			Chromium	15.00	µg/ft ²	3,094
			Lead	93.00	µg/ft ²	10
			Selenium	< 2.50	µg/ft ²	1,236
			Silver	< 0.50	µg/ft ²	62
105L-W-08	Field Blank		Arsenic	< 2.50	µg	--
			Barium	< 0.50	µg	--
			Cadmium	< 0.10	µg	--
			Chromium	< 1.00	µg	--
			Lead	< 0.50	µg	--
			Selenium	< 2.50	µg	--
			Silver	< 0.50	µg	--

APPENDIX B – LABORATORY ANALYSIS REPORT



7469 Whitepine Rd
North Chesterfield, VA 23237
Telephone: 800.347.4010

Wipe Metals Analysis Report

Client: OCCU-Tec Inc
2604 NE Industrial Drive
Suite 230
North Kansas City, MO 64117

Report Number: 25-01-02713

Received Date: 01/16/2025
Analyzed Date: 01/22/2025
Reported Date: 01/24/2025

Project/Test Address: GSA Goodfellow Complex

Client Number:
202507

Laboratory Results

Fax Number:

Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft ²)	Total Metal (ug)	Concentration (ug/ft ²)	Narrative ID
25-01-02713-001	105L-W-01	Arsenic (As)	1.00	<2.50	<2.5	
		Barium (Ba)	1.00	1.80	1.8	
		Cadmium (Cd)	1.00	<0.100	<0.10	
		Chromium (Cr)	1.00	<1.00	<1.0	
		Lead (Pb)	1.00	2.12	2.1	
		Selenium (Se)	1.00	<2.50	<2.5	
		Silver (Ag)	1.00	<0.500	<0.50	
25-01-02713-002	105L-W-02	Arsenic (As)	1.00	<2.50	<2.5	
		Barium (Ba)	1.00	1.56	1.6	
		Cadmium (Cd)	1.00	0.180	0.18	
		Chromium (Cr)	1.00	<1.00	<1.0	

Environmental Hazards Services, L.L.C

Client Number: 202507

Report Number: 25-01-02713

Project/Test Address: GSA Goodfellow Complex

Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft ²)	Total Metal (ug)	Concentration (ug/ft ²)	Narrative ID
25-01-02713-003	105L-W-03	Lead (Pb)	1.00	1.18	1.2	
		Selenium (Se)	1.00	<2.50	<2.5	
		Silver (Ag)	1.00	<0.500	<0.50	
		Arsenic (As)	1.00	<2.50	<2.5	
		Barium (Ba)	1.00	0.720	0.72	
		Cadmium (Cd)	1.00	<0.100	<0.10	
		Chromium (Cr)	1.00	<1.00	<1.0	
		Lead (Pb)	1.00	0.670	0.67	
		Selenium (Se)	1.00	<2.50	<2.5	
		Silver (Ag)	1.00	<0.500	<0.50	
25-01-02713-004	105L-W-04	Arsenic (As)	1.00	<2.50	<2.5	
		Barium (Ba)	1.00	<0.500	<0.50	
		Cadmium (Cd)	1.00	<0.100	<0.10	
		Chromium (Cr)	1.00	<1.00	<1.0	
		Lead (Pb)	1.00	<0.500	<0.50	
		Selenium (Se)	1.00	<2.50	<2.5	
		Silver (Ag)	1.00	<0.500	<0.50	
		Arsenic (As)	1.00	<2.50	<2.5	
		Barium (Ba)	1.00	3.92	3.9	

Environmental Hazards Services, L.L.C

Client Number: 202507

Report Number: 25-01-02713

Project/Test Address: GSA Goodfellow Complex

Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft ²)	Total Metal (ug)	Concentration (ug/ft ²)	Narrative ID
25-01-02713-006	105L-W-06	Cadmium (Cd)	1.00	<0.100	<0.10	
		Chromium (Cr)	1.00	<1.00	<1.0	
		Lead (Pb)	1.00	2.34	2.3	
		Selenium (Se)	1.00	<2.50	<2.5	
		Silver (Ag)	1.00	<0.500	<0.50	
		Arsenic (As)	1.00	<2.50	<2.5	
		Barium (Ba)	1.00	0.935	0.94	
		Cadmium (Cd)	1.00	<0.100	<0.10	
		Chromium (Cr)	1.00	<1.00	<1.0	
		Lead (Pb)	1.00	0.905	0.90	
25-01-02713-007	105L-W-07	Selenium (Se)	1.00	<2.50	<2.5	
		Silver (Ag)	1.00	<0.500	<0.50	
		Arsenic (As)	1.00	<2.50	<2.5	
		Barium (Ba)	1.00	14.5	15	
		Cadmium (Cd)	1.00	4.11	4.1	
		Chromium (Cr)	1.00	15.4	15	
		Lead (Pb)	1.00	93.4	93	
		Selenium (Se)	1.00	<2.50	<2.5	
		Silver (Ag)	1.00	<0.500	<0.50	

Environmental Hazards Services, L.L.C

Client Number: 202507

Report Number: 25-01-02713

Project/Test Address: GSA Goodfellow Complex

Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft ²)	Total Metal (ug)	Concentration (ug/ft ²)	Narrative ID
25-01-02713-008	105L-W-08	Arsenic (As)		<2.50	<2.5	
		Barium (Ba)		<0.500	<0.50	
		Cadmium (Cd)		<0.100	<0.10	
		Chromium (Cr)		<1.00	<1.0	
		Lead (Pb)		<0.500	<0.50	
		Selenium (Se)		<2.50	<2.5	
		Silver (Ag)		<0.500	<0.50	

Sample Narratives:

Analyst: Carlos Gonzalez

Method: EPA SW846 3050B/6010D

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Reviewed By Authorized Signatory:

Tasha Eaddy

QA/QC Clerk

Sample Results denoted with a "less than" (<) sign contains less than the reporting limit based on a 50mL volume. The reporting limit for Lead is 0.5ug.

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.

Legend

ug = microgram

ug/ft² = micrograms per square foot

mL = milliliter

ft² = square foot

ENVIRONMENTAL HAZARDS SERVICES, LLC

Metals Chain of Custody Form

Page 1 of 1

Company Name	OCCU-TEC Inc.						Account #	202507								
Company Address	2604 NE Industrial Drive Suite 230						City/State/Zip	North Kansas City, MO 64117								
Phone	816-231-5580						Email	jarnold@occutech.com								
Project Name / Testing Address		GSA Goodfellow Complex														
PO Number	925001						Collected By	Justin Arnold								
Turn-Around Time	<input checked="" type="radio"/> 5 Day <input type="radio"/> 3 Day <input type="radio"/> 2 Day <input type="radio"/> 1 Day <input type="radio"/> Same Day / Weekend - Must Call Ahead															
LAB NUMBER	Client Sample ID	Collection Date & Time	METALS				Other Metals	PARTICULATES			AIR			WIPES		
			Pb TCLP	TCLP RCRA 8	RCRA 8 Total	Toxic Metal Profile		Welding Fume Profile	TX-11 TCLP	CA-17 Total	Total Nuisance Dust	Respirable Dust	TSP Gravimetric		TSP Pb	PM-10
															AREA	
1	10SL-B-01	1/15/25 0800 - 1204					Ag, As, Ba, Cd, Cr, Pb, Se						246	244	605.2	x
2	10SL-B-02	0801-1207											246	2.47	607.4	x
3	10SL-B-03	0802-1208											246	2.54	622.8	x
4	10SL-B-04	0803-1209											246	2.49	612.5	x
5	10SL-B-05	0800 -											-	-	-	x
6																
7	10SL-W-01	1/15/25 0809														12 x 12
8	10SL-W-02	0812														12 x 12
9	10SL-W-03	0814														12 x 12
10	10SL-W-04	0815														12 x 12
11	10SL-W-05	0822														12 x 12
12	10SL-W-04	0825														12 x 12
13	10SL-W-07	0830														12 x 12
14	10SL-W-08	0807														x
15																
Released By:		Justin Arnold						Date:	1/15/25			Time:	1530			
Signature:		(b) (6)														

Released By:

Date: 1/15/25

Time: 1530

Signature: (b) (6)

LAB USE ONLY - BELOW THIS LINE

Received By:

(b) (6)

Signature:

10

25-01-02713



Due Date:

01/24/2025

(Friday)

AF

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7469 WHITEPINE RD. RICHMOND, VA 23237 (800)-347-4010

RESULTS VIA CLIENT PORTAL AVAILABLE @ www.leadlab.com

APPENDIX C – PROFESSIONAL ACCREDITATION

STATE OF MISSOURI
DEPARTMENT OF HEALTH AND SENIOR SERVICES

LEAD ABATEMENT OCCUPATION LICENSE

Issued to:

Justin Arnold

The person, firm or corporation whose name appears on this certificate has fulfilled the requirements for licensure as set forth in the Missouri Revised Statutes 701.300-701.338, as long as not suspended or revoked, and is hereby authorized to engage in the activity listed below.

Lead Risk Assessor

Category of License

Issuance Date: **8/27/2024**

Expiration Date: **8/27/2026**

License Number: **120611-300003622**

(b) (6)

Paula F. Nickelson
Director
Department of Health and Senior Services