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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/ft<sup>2</sup>.

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 <sup>2</sup>	62
			Barium	1.80	µg/ft <sup>2</sup>	3,094
			Cadmium	< 0.10	µg/ft <sup>2</sup>	31
			Chromium	< 1.00	µg/ft <sup>2</sup>	3,094
			Lead	2.12	µg/ft <sup>2</sup>	10
			Selenium	< 2.50	µg/ft <sup>2</sup>	1,236
			Silver	< 0.50	µg/ft <sup>2</sup>	62
105L-W-02	Room 111	Top of Fridge (>70")	Arsenic	< 2.50	µg/ft <sup>2</sup>	62
			Barium	1.56	µg/ft <sup>2</sup>	3,094
			Cadmium	< 0.18	µg/ft <sup>2</sup>	31
			Chromium	< 1.00	µg/ft <sup>2</sup>	3,094
			Lead	1.80	µg/ft <sup>2</sup>	10
			Selenium	< 2.50	µg/ft <sup>2</sup>	1,236
			Silver	< 0.50	µg/ft <sup>2</sup>	62
105L-W-03	Room 111 - west side	Work Station	Arsenic	< 2.50	µg/ft <sup>2</sup>	62
			Barium	< 0.72	µg/ft <sup>2</sup>	3,094
			Cadmium	< 0.10	µg/ft <sup>2</sup>	31
			Chromium	< 1.00	µg/ft <sup>2</sup>	3,094
			Lead	0.67	µg/ft <sup>2</sup>	10
			Selenium	< 2.50	µg/ft <sup>2</sup>	1,236
			Silver	< 0.50	µg/ft <sup>2</sup>	62
105L-W-04	Room 107	Desk	Arsenic	< 2.50	µg/ft <sup>2</sup>	62
			Barium	< 0.50	µg/ft <sup>2</sup>	3,094
			Cadmium	< 0.10	µg/ft <sup>2</sup>	31
			Chromium	< 1.00	µg/ft <sup>2</sup>	3,094
			Lead	< 0.50	µg/ft <sup>2</sup>	10
			Selenium	< 2.50	µg/ft <sup>2</sup>	1,236
			Silver	< 0.50	µg/ft <sup>2</sup>	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 <sup>2</sup>	62
			Barium	3.90	µg/ft <sup>2</sup>	3,094
			Cadmium	< 0.10	µg/ft <sup>2</sup>	31
			Chromium	< 1.00	µg/ft <sup>2</sup>	3,094
			Lead	2.30	µg/ft <sup>2</sup>	10
			Selenium	< 2.50	µg/ft <sup>2</sup>	1,236
			Silver	< 0.50	µg/ft <sup>2</sup>	62
105L-W-06	Room 106 - south entrance	Floor	Arsenic	< 2.50	µg/ft <sup>2</sup>	62
			Barium	0.94	µg/ft <sup>2</sup>	3,094
			Cadmium	< 0.10	µg/ft <sup>2</sup>	31
			Chromium	< 1.00	µg/ft <sup>2</sup>	3,094
			Lead	0.90	µg/ft <sup>2</sup>	10
			Selenium	< 2.50	µg/ft <sup>2</sup>	1,236
			Silver	< 0.50	µg/ft <sup>2</sup>	62
105L-W-07	Room 111 - East Equipment Storage	Shelf	Arsenic	< 2.50	µg/ft <sup>2</sup>	62
			Barium	15.00	µg/ft <sup>2</sup>	3,094
			Cadmium	4.10	µg/ft <sup>2</sup>	31
			Chromium	15.00	µg/ft <sup>2</sup>	3,094
			Lead	93.00	µg/ft <sup>2</sup>	10
			Selenium	< 2.50	µg/ft <sup>2</sup>	1,236
			Silver	< 0.50	µg/ft <sup>2</sup>	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

**Fax Number:**

# Laboratory Results

Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft <sup>2</sup> )	Total Metal (ug)	Concentration (ug/ft <sup>2</sup> )	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 (ft²)	Total Metal (ug)	Concentration (ug/ft²)	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	
25-01-02713-005	105L-W-05	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 (ft²)	Total Metal (ug)	Concentration (ug/ft²)	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 <sup>2</sup> )	Total Metal (ug)	Concentration (ug/ft <sup>2</sup> )	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

(b) (6)

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/ft <sup>2</sup> = micrograms per square foot
	mL = milliliter	ft <sup>2</sup> = 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	Total Time	Flow Rate	Vol.	AREA
																Min.	L/min	Total Liters	
1	10SL-A-01	1/15/25 0800-1204							Ag, As, Ba, Cd, Cr, Pb, Se						246	246	605.2	x	
2	10SL-A-02	0801-1207												246	247	607.4	x		
3	10SL-A-03	0802-1209												246	254	622.8	x		
4	10SL-W-01	0803-1209												246	249	612.5	x		
5	10SL-A-05	0900-												-	-	-	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	0816															12" x 12"		
10	10SL-W-04	0818															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																	x		

Released By:	Justin Arnold	Date:	1/15/25	Time:	1530
Signature:	(b) (6)				

LAB USE ONLY - BELOW THIS LINE

Received By: [Signature]  
 Signature: (b) (6)  
 Date: 1/16/25 Time: 210 ☐ AM ☒ PM  
☐ Portal Contact Added

25-01-02713



Due Date:  
 01/24/2025  
 (Friday)  
 AE

P

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

RESULTS VIA CLIENT PORTAL AVAILABLE @ [www.leadlab.com](http://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

Lead Licensing Program, PO Box 570, Jefferson City, MO 65102