



Stakeholder Memo #35

In GSA's ongoing effort to inform tenants about the [Goodfellow Environmental Project](#), the following provides recent updates on the [Goodfellow Federal Center](#).

Sampling results since the last memo

Bi-Annual Air and Surface Sampling

There have been two bi-annual sampling events conducted since last reported. Industrial hygiene sampling was conducted in Buildings 105, 105L, 106, 107, and 110 at the Goodfellow Federal Center at 4300 Goodfellow Boulevard in St. Louis, Missouri, from June 3-7, 2024, and January 8-15, 2025, in occupied areas throughout these buildings. The air and surface sampling were conducted to determine levels of seven of the RCRA metals that are in dust as part of our routine sampling program. The sampling was conducted in accordance with NIOSH, ASTM, EPA, and other nationally recognized industrial hygiene sampling and analytical methods. A summary of the results are as follows:

- There were no detectable levels of arsenic, barium, cadmium, chromium, lead, selenium, or silver found in any of the 94 air samples collected from within the five buildings during the two sampling events. No further action is required at this time.
- Wipe samples were collected from random interior surface locations throughout the five buildings. Common surfaces and areas accessed by tenants, as well as contractors, were the focus of the sampling events. Results of the dust wipe samples collected from surfaces in the building indicate that detectable concentrations of arsenic, barium, cadmium, chromium, lead, selenium, and/or silver were found in 106 of the 147 samples (see [Federal Center Environmental Reading Room](#) to view all results) in all of the occupied buildings. All levels of arsenic, barium, chromium, selenium, and silver found in the samples were below housekeeping and clean area limits, as recommended and described by OSHA and the Brookhaven National Laboratory Procedure. Twenty-one (21) samples showed levels of lead greater than the [EPA action level](#) of 10 micrograms of lead per square foot ($\mu\text{g}/\text{ft}^2$). In addition, two samples exceeded the clean area limit for cadmium. 19 of the 21 samples occurred in areas that are accessed by a tenant and facility contractors only who presently have required Site-Specific Safety Plans (SSSPs). The other 2 of 21 locations were in stairwells that were immediately re-cleaned and, then, retested to determine if the cleaning brought the areas under the EPA levels.
- Only two common spaces within the five occupied buildings had samples that resulted in elevated lead. These were both stairwells. Although these spaces are routinely cleaned, an enhanced cleaning was performed and the areas were re-tested until results were below the threshold for lead. All remaining areas of those with elevated lead and/or cadmium are accessed by a tenant and facility contractors only who have SSSPs in place to manage and reduce exposures to

contaminants. Recommended actions were provided to help mitigate elevated levels in these areas.

All test results/reports are available for review in our Goodfellow Federal Center Environment Reading Room, both [online](#) and in the Building 107 GSA office. Notifications were sent to all affected occupants.

Bi-Weekly Air and Surface Sampling

Air and surface wipe sampling has continued on a bi-weekly basis in the occupied areas of Building 107. This is to assess the potential contamination from the contaminated dust found on overhead surfaces in the open ceiling. The sampling is conducted in accordance with NIOSH, ASTM, EPA, and other nationally recognized industrial hygiene sampling and analytical methods. All air samples have been found to be below the laboratory reporting limits. Results from surface wipe samples continue to show levels below the clean area limits. This sampling will continue in Building 107.

All test results are reported to affected occupants and are available for review in our Goodfellow Federal Center Environment Reading Room, both [online](#) and in the Building 107 GSA office.

Drinking Water Sampling

Samples of drinking water in occupied buildings are collected on an bi-annual basis (twice a year), in accordance with the EPA Lead and Copper Rule. There have been two bi-annual sampling events conducted since last reported: one in March 2024 and one in September 2024. A total of 77 samples, including duplicates, were collected from five occupied buildings. Five of the samples collected during the March 2024 sampling event resulted in exceedances of the action level for lead, 15 µg/L. All of these samples were from sinks in Building 105, 2nd floor, in the USDS-FSIS space, and include a duplicate. The sinks in the break room and kitchenette were removed from service. In-line filters were installed, as well as tankless hot water heaters, at these fixtures. After retesting showed levels below the action levels for lead and copper, the sinks were returned to service. The other two sinks were in laboratory space and were left in service. Since removing the sink from service has the potential to negatively impact the tenant agency's operations, GSA authorized the use of these sinks for non-potable/not for consumption and posted a warning sign. In addition, the tenant agency agreed to follow a two-minute flushing before using any of the water. Also, GSA has implemented a Drinking Water Management Policy, which includes following guidance to maintain water quality for the facilities. None of the samples from the September sampling event resulted in levels over the action levels, 15 µg/L for lead and 1,300 µg/L for copper. The next round of drinking water sampling begins in March 2025.

All test results/reports are available for review in our Goodfellow Federal Center Environment Reading Room, both [online](#) and in the Building 107 GSA office.

Groundwater

The quarterly round of groundwater sampling was conducted in October 2024. This sampling aligns with our ongoing commitment to monitor and address groundwater quality issues at the site. Total lead and dissolved antimony were detected at concentrations above their respective project action limits (PALs) approved by the Missouri Department of Natural Resources (MDNR). All tenants were notified. Additional groundwater samples will be collected in 2025.

Soil

The Remedial Investigation (RI) Report, along with the baseline human health risk assessment was approved by MDNR and the Department of Health and Senior Services (DHSS), on October 23, 2024. This milestone is a critical part of our compliance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process, aimed at preparing the property for eventual transfer out of Federal ownership. Our objective through the RI has been to thoroughly quantify the nature and extent of onsite contaminants and assess their potential human health risks.

With approval from MDNR and DHSS, GSA has now proceeded with the Feasibility Study and Proposed Plan for the Goodfellow Federal Center.

The polychlorinated biphenyl (PCB) Sampling and Analysis Plan (SAP) designed to ensure the comprehensive delineation of PCBs under Toxic Substances Control Act (TSCA) authority, has undergone thorough review by MDNR and was approved by the Environmental Protection Agency (EPA) Region 7. This approval reflects a collaborative effort to meet stringent regulatory requirements and address potential environmental concerns. Following this approval, GSA initiated a critical step in identifying the presence and extent of PCBs at the site, in alignment with the approved SAP. GSA is currently awaiting analytical results from this October 2024 PCB sampling event. These results will be used to refine our understanding of PCB distribution and inform any necessary remedial actions.

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NOTE: Due to there being only one occupant left in the building this Stakeholder Memo will be sent out semi-annually.

If you want to receive the Goodfellow environmental memos directly to your email (bi-annually), sign up using [our registration form](#) or email r6environmental@gsa.gov.

GSA Region 6 Environmental Team
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