

June 2017

In May 2016, our team at GSA announced increased controls and access restrictions for contractors and tenants at the Goodfellow Federal Center. These measures were implemented after previously conducted environmental testing found varying levels of asbestos, organic chemicals, heavy metals and lead dust in basements, tunnels, crawl spaces and other isolated areas of the facility. At that time, GSA also initiated a series of emails to keep you and other stakeholders informed of ongoing environmental investigation, remediation and containment activities.

As we mentioned in our [first memo](#), the known contaminants likely stem from ammunition manufacturing processes dating back to 1941. The facility was initially an ammunition plant during the Second World War, and was converted into office space in the 1960s.

After our initial outreach efforts, GSA invited the National Institute of Occupational Safety and Health (NIOSH) to conduct an evaluation at the facility. We also contracted with Occu-Tec; Terracon Consultants, Inc.; Tetra Tech, Inc.; and Global Environmental, Inc. to collect air, surface and soil samples to help us better characterize the extent of contamination. Further studies and investigations were also initiated to prepare for future remediation activities.

In addition, the Occupational Safety and Health Administration (OSHA) conducted an independent investigation of the facility and cited GSA for [seven items](#), which we responded to as follows:

- Addressed the three communication-related items by establishing the email campaign and online reading room;
- In the process of correcting three more citation items – elevator flywheel guarding, elevator vertical belt guarding and electrical control cabinet protections. The first phase of the elevator project has been completed. The second phase will be finished in the next 60 to 90 days; and,
- Agreed to July 25, 2018, as the due date for corrective action on the final OSHA citation item, clearing surfaces of lead accumulation.

Remedial Investigation & Remedial Action Plan

We are addressing long-term environmental concerns through two regulated efforts: the *Goodfellow Federal Center Remedial Action Plan* (addresses building interior spaces) and a *Remedial Investigation* (addresses the outside and ground environment).

The [Remedial Investigation](#) is an early step in the EPA-mandated Comprehensive Environmental Response, Compensation and Liability Act, or [CERCLA](#), process. As we discussed in a [memo last fall](#), the Missouri Department of Natural Resources is the oversight agency for the environmental investigation and any resulting cleanup activities at the Goodfellow Federal Center. MDNR is currently reviewing the Remedial Investigation and other reports. If they decide more data is needed, we will continue the investigation.

The draft Goodfellow Federal Center Remedial Action Plan received in February provided initial data for developing a strategy to address contaminants in building interiors campuswide. We continue to work with environmental contractors to gather more information and explore cleanup options.

Moving Forward

Research and evaluations conducted over the past year have verified the effectiveness of our operational controls as we continue to manage contaminants in place until cleanup can occur. All controls on restricted areas will remain in place. Anyone accessing restricted areas should have an accepted Site Specific Safety Plan.



GSA's Goodfellow environmental team is now being led by Javonne Robinson. Javonne will oversee all environment-related activities at Goodfellow, as well as communication efforts related to tenant outreach. The onsite and online reading rooms will remain available, and our team will continue to send emails directly to stakeholders on a regular basis. In addition, GSA Industrial Hygienist Diane Czarnecki is now leading sampling projects conducted on site.

In accordance with the NIOSH recommendations, GSA has instructed janitorial contractors to increase the frequency of housekeeping in stairwells and other common areas, maintain the current frequency of office cleaning, use only wet dusting methods, and wash equipment (mop heads, dust cloths, etc.) after each use. Housekeepers will also continue using HEPA vacuums.

GSA's primary environmental safety contractor, Occu-Tec, will conduct the next round of campuswide indoor air and domestic water sampling, likely beginning in late June. The GSA field office will share a schedule with tenant agency leaders once it is available. Occu-Tec will also continue to support remediation efforts, ensure quality controls, provide operational assessments and advise GSA on sampling methodology.

If you have any questions, please email r6environmental@gsa.gov. You can also refer to the online reading room for previous informational messages.

Thank you,

GSA Region 6 Environmental Team