

January 20, 2021

Diane Czarnecki Industrial Hygienist Facilities Management Division GSA Public Buildings Service – Heartland Region 2300 Main Street Kansas City, MO 64108

Re: Goodfellow Federal Center

Metals in Settled Dust Sampling – Building 103E

Project No. 121244

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 103E located at the Goodfellow Federal Center (GFC) in St. Louis, Missouri. Burns & McDonnell 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.

INTRODUCTION

Per historical use and previous characterization, Burns & McDonnell was contracted to perform settled dust sampling for the analysis of seven (7) of the Resource Conservation and Recovery Act (RCRA) target metals (arsenic, barium, cadmium, chromium, lead, selenium, and silver) from various surfaces within buildings. The purpose of this testing was to further characterize the presence and concentration of target metals in common tenant-occupied areas of the building.

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

Settled dust wipe sampling at Bldg. 103E was conducted on December 2, 2020 by Emily Ahlemeyer of Burns & McDonnell and Jeff Smith of OCCU-TEC.

METALS IN SETTLED DUST SAMPLING

Metals in settled dust sampling was conducted primarily within tenant-occupied areas. Dust wipe sampling was conducted in accordance with ASTM Standard E1728: Standard Practice for Collection of Settled Dust Samples Using Wipe Sampling Methods for Subsequent Lead Determination and ASTM Standard D6966: Standard Practice for Collection of Settled Dust Samples Using Wipe Sampling Methods for Subsequent Determination of Metals. ASTM Standards E1728 and D6966 are consistent with the methodology described in the Housing and



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Urban Development Guidelines-Appendix 13.1 and 40 CFR 745.63. The Brookhaven National Laboratory's Surface Wipe Sampling Procedure (IH75190) was also used as a guideline.

Dust wipe sampling for the target metals was conducted on a variety of representative surfaces that have the potential of being disturbed by building occupants. In addition, basements, penthouses, and mechanical spaces were sampled. A representative surface area of approximately one square foot (1 SF) was measured and delineated with plastic templates. The dust wipe samples were collected using dedicated dust wipe cloths meeting ASTM E1792 Standard. 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 using a clean, disposable glove. Then, the wipe was folded over itself and the area was wiped again in a direction perpendicular to the first wipe orientation. Then, the wipe folded over itself again and the area was wiped around the perimeter. The wipe sample was then placed into a labeled, clean container. 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 3050B/6010D. EHS is accredited under the American Industrial Hygiene Association (AIHA) Laboratory Accreditation Program (LAP) identification number LAP-100420.

Whereas the Occupational Safety and Health Administration (OSHA) has not established regulatory limits for surface concentrations of metals, the OSHA Technical Manual Section II: Chapter 2 (III.A) describes a method for calculating "housekeeping" standards, as recommended acceptable surface limits. Brookhaven's IH75190 procedure uses the housekeeping standards to derive a lower, "clean area limit" for non-operational areas that can be accessed or contacted without special training or precautions. Burns & McDonnell calculated clean area limits for metals not included in the Brookhaven procedure, specifically barium, chromium (total), selenium and silver. Wipe results were compared to the Brookhaven procedure's clean area limits for each metal.

Results of the dust wipe samples collected from the building indicate that 8 of the 9 samples contained concentrations of target metals above laboratory reporting 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 lab's reportable limit.



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Table 1. Summary of Dust Wipe Results

Analyte	Lowest Concentration ^(a) (µg/sq. ft) ^(b)	Highest Concentration ^(a) (μg/sq. ft) ^(b)	Clean Area Limit (c) µg/sq. ft (b)
Silver	< 0.5	0.9	62
Arsenic	<1.0	9.5	62
Barium	1.3	19.0	3,094
Cadmium	0.1	1.1	31
Chromium (Total)	<1.0	58.0	3,094
Lead	<0.5	190.0	10 ^(d)
Selenium	<2.5	<2.5	1,236

- (a) Samples with a "<" sign indicate that the results were below the laboratory's reporting limit.
- (b) μ g/sq. ft = micrograms per square foot of surface area.
- (c) Clean Area Limit per Brookhaven IH75190=OSHA Housekeeping Limit [PEL (μg/m³) x 10 m³/100cm²] / 15.
- (d) Lead clean area limit: Brookhaven references EPA/HUD limit for floors, set at 10 µg/sq. ft. as of January 2020.

Two (2) samples exceeded the lead clean area limit. Samples 103E-W-06 and 103E-W-08 resulted in lead concentrations of 190 and $130~\mu g/sq$. ft, respectively. The remaining target metal sample results were below housekeeping and clean area limits, as recommended and described by OSHA and the Brookhaven Procedure.

Burns & McDonnell appreciates the opportunity to work with the GSA on this project. Please contact us if you have any questions regarding this report or if we may be of any additional service.



Matt Shanahan, CHMM Project Manager

Attachments:

Appendix A – Sample Summary Table Appendix B – Laboratory Analysis Report

Appendix C – Licenses



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Information in Appendices B and C is not accessible for people using screen reader technology. If this information is required, it can be furnished upon request by contacting 816-223-6198 or redenvironmental@gsa.gov.



Appendix A Sample Summary Table

Sample Number	Location	Area Description	Analyte	Result	Units	Clean Area Limit*
103E-W-01	1st floor, column L22	Floor	Silver	< 0.50	μg/ft²	62
			Arsenic	< 1.0	μg/ft²	62
			Barium	4.1	μg/ft²	3,094
			Cadmium	0.32	μg/ft²	31
			Chromium	1.8	μg/ft²	3,094
			Lead	2.7	μg/ft²	10
			Selenium	< 2.5	μg/ft²	1,236
103E-W-02	1st floor, northwest office	Top of cabinet	Silver	< 0.50	μg/ft²	62
			Arsenic	< 1.0	μg/ft²	62
			Barium	1.9	μg/ft²	3,094
			Cadmium	0.12	μg/ft²	31
			Chromium	1.1	μg/ft²	3,094
			Lead	0.66	μg/ft²	10
			Selenium	< 2.5	μg/ft²	1,236
103E-W-03	1st floor, column L25	Floor	Silver	< 0.50	μg/ft²	62
			Arsenic	< 1.0	μg/ft²	62
			Barium	2.2	μg/ft²	3,094
			Cadmium	0.10	μg/ft²	31
			Chromium	1.5	μg/ft²	3,094
			Lead	0.95	μg/ft²	10
			Selenium	< 2.5	μg/ft²	1,236

Appendix A Sample Summary Table

Sample Number	Location	Area Description	Analyte	Result	Units	Clean Area Limit*
103E-W-04	2nd floor, column P22	Top of cabinet	Silver	< 0.50	μg/ft²	62
			Arsenic	< 1.0	μg/ft²	62
			Barium	1.7	μg/ft²	3,094
			Cadmium	0.38	μg/ft²	31
			Chromium	< 1.0	μg/ft²	3,094
			Lead	0.63	μg/ft²	10
			Selenium	< 2.5	μg/ft²	1,236
103E-W-05	2nd floor, column P22	Floor	Silver	< 0.50	μg/ft²	62
			Arsenic	< 1.0	μg/ft²	62
			Barium	1.3	μg/ft²	3,094
			Cadmium	0.14	μg/ft²	31
			Chromium	< 1.0	μg/ft²	3,094
			Lead	< 0.50	μg/ft²	10
			Selenium	< 2.5	μg/ft²	1,236
103E-W-06	2nd floor, column P25	Floor	Silver	< 0.50	μg/ft²	62
			Arsenic	< 1.0	μg/ft²	62
			Barium	13	μg/ft²	3,094
			Cadmium	1.1	μg/ft²	31
			Chromium	20	μg/ft²	3,094
			Lead	190 ⁻		10
			Selenium	< 2.5	μg/ft²	1,236

Appendix A Sample Summary Table

Sample Number	Location	Area Description	Analyte	Result	Units	Clean Area Limit*
103E-W-07	2nd floor, column L25	Top of cabinet	Silver	< 0.50	μg/ft²	62
			Arsenic	< 1.0	μg/ft²	62
			Barium	1.9	μg/ft²	3,094
			Cadmium	0.10	μg/ft²	31
			Chromium	< 1.0	μg/ft²	3,094
			Lead	0.76	μg/ft²	10
			Selenium	< 2.5	μg/ft²	1,236
103E-W-08	Roof level	Stairwell	Silver	0.85	μg/ft²	62
			Arsenic	9.5	μg/ft²	62
			Barium	19	μg/ft²	3,094
			Cadmium	0.87	μg/ft²	31
			Chromium	58	μg/ft²	3,094
			Lead	130 **	μg/ft²	10
			Selenium	< 2.5	μg/ft²	1,236
103E-W-09	Field Blank		Silver	< 0.500	μg	
			Arsenic	< 1.00	μg	
			Barium	< 0.500	μg	
			Cadmium	< 0.100	μg	
			Chromium	< 1.00	μg	
			Lead	< 0.500	μg	
			Selenium	< 2.50	μg	

^{*} Clean Area Limit per Brookhaven IH75190=OSHA Housekeeping Limit [PEL (μ g/m³) x 10 m³/100cm²] / 15. Lead clean area limit: Brookhaven references EPA/HUD limit for floors, set at 10 μ g/sq. ft. as of January 2020.

^{**} Indicates results at or above the Clean Area Limit





Environmental Hazards Services, L.L.C. 7469 Whitepine Rd Richmond, VA 23237

Telephone: 800.347.4010

Client: Burns & McDonnell Engineering **Report Number:** 20-12-00753

9400 Ward Pkwy.

Kansas City, MÓ 64114 Received Date: 12/07/2020 Analyzed Date: 12/09/2020

Reported Date: 12/10/2020

Wipe Metals Analysis Report

Project/Test Address: 168765; GFC; 4300 Goodfellow Blvd.; 103E-W-01-103E-W-09

Client Number:

Fax Number: **Laboratory Results** 816-822-3494 26-3514

Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft²)	Total Metal (ug)	Concentration (ug/ft²)	Narrative ID
20-12-00753-001	103E-W-01	Arsenic (As)	1.00	<1.00	<1.0	L01
		Barium (Ba)	1.00	4.06	4.1	L01
		Cadmium (Cd)	1.00	0.315	0.32	L01
		Chromium (Cr)	1.00	1.84	1.8	L01
		Lead (Pb)	1.00	2.72	2.7	L01
		Selenium (Se)	1.00	<2.50	<2.5	L01
		Silver (Ag)	1.00	<0.500	<0.50	L01
20-12-00753-002	103E-W-02	Arsenic (As)	1.00	<1.00	<1.0	L01
		Barium (Ba)	1.00	1.86	1.9	L01
		Cadmium (Cd)	1.00	0.120	0.12	L01
		Chromium (Cr)	1.00	1.06	1.1	L01

Client Number:

26-3514

Project/Test Address: 168765; GFC; 4300 Goodfellow Blvd.; 103E-W-01-

Report Number: 20-12-00753

103E-W-09

Total Metal Wipe Area Concentration Lab Sample **Client Sample** Analyte: **Narrative** Number Number (ug/ft²) ID (ft²) (ug) Lead (Pb) 1.00 0.655 0.66 L01 Selenium (Se) 1.00 <2.50 <2.5 L01 Silver (Ag) 1.00 < 0.500 < 0.50 L01 L01 20-12-00753-003 103E-W-03 Arsenic (As) 1.00 <1.00 <1.0 L01 Barium (Ba) 1.00 2.24 2.2 Cadmium (Cd) 1.00 0.105 0.10 L01 Chromium (Cr) 1.00 1.48 1.5 L01 Lead (Pb) 1.00 0.950 0.95 L01 Selenium (Se) 1.00 < 2.50 < 2.5 L01 L01 Silver (Ag) 1.00 < 0.500 < 0.50 103E-W-04 <1.00 L01 20-12-00753-004 Arsenic (As) 1.00 <1.0 Barium (Ba) L01 1.00 1.68 1.7 Cadmium (Cd) 1.00 0.375 0.38 L01 L01 Chromium (Cr) 1.00 <1.00 <1.0 Lead (Pb) 1.00 0.630 0.63 L01 L01 Selenium (Se) 1.00 < 2.50 <2.5 Silver (Ag) 1.00 < 0.500 < 0.50 L01 20-12-00753-005 103E-W-05 Arsenic (As) 1.00 <1.00 <1.0 L01

Client Number:

26-3514

Project/Test Address: 168765; GFC; 4300 Goodfellow Blvd.; 103E-W-01-

Report Number: 20-12-00753

103E-W-09

Wipe Area **Total Metal** Concentration Lab Sample **Client Sample** Analyte: **Narrative** Number Number ID (ft²) (ug) (ug/ft²) Barium (Ba) 1.00 1.27 1.3 L01 Cadmium (Cd) 1.00 0.135 0.14 L01 Chromium (Cr) 1.00 <1.00 <1.0 L01 L01 Lead (Pb) 1.00 < 0.500 < 0.50 L01 Selenium (Se) 1.00 < 2.50 <2.5 Silver (Ag) 1.00 < 0.500 < 0.50 L01 20-12-00753-006 103E-W-06 Arsenic (As) 1.00 <1.00 <1.0 L01 Barium (Ba) 1.00 13.4 13 L01 Cadmium (Cd) 1.00 1.06 1.1 L01 L01 Chromium (Cr) 1.00 20.4 20 190 190 L01 Lead (Pb) 1.00 Selenium (Se) < 2.5 L01 1.00 < 2.50 Silver (Ag) 1.00 < 0.500 < 0.50 L01 L01 20-12-00753-007 103E-W-07 Arsenic (As) 1.00 <1.00 <1.0 Barium (Ba) 1.00 1.88 1.9 L01 Cadmium (Cd) 0.10 L01 1.00 0.100 Chromium (Cr) 1.00 <1.00 <1.0 L01 Lead (Pb) 1.00 0.760 0.76 L01

Client Number: 26-3514 **Report Number:** 20-12-00753

Project/Test Address: 168765; GFC; 4300 Goodfellow Blvd.; 103E-W-01-103E-W-09

Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft²)	Total Metal (ug)	Concentration (ug/ft²)	Narrative ID
		Selenium (Se)	1.00	<2.50	<2.5	L01
		Silver (Ag)	1.00	<0.500	<0.50	L01
20-12-00753-008	103E-W-08	Arsenic (As)	1.00	9.52	9.5	L01
		Barium (Ba)	1.00	18.9	19	L01
		Cadmium (Cd)	1.00	0.870	0.87	L01
		Chromium (Cr)	1.00	57.5	58	L01
		Lead (Pb)	1.00	131	130	L01
		Selenium (Se)	1.00	<2.50	<2.5	L01
		Silver (Ag)	1.00	0.850	0.85	L01
20-12-00753-009	103E-W-09	Arsenic (As)		<1.00		L01
		Barium (Ba)		<0.500		L01
		Cadmium (Cd)		<0.100		L01
		Chromium (Cr)		<1.00		L01
		Lead (Pb)		<0.500		L01
		Selenium (Se)		<2.50		L01
		Silver (Ag)		<0.500		L01

Client Number: 26-3514 **Report Number:** 20-12-00753

Project/Test Address: 168765; GFC; 4300 Goodfellow Blvd.; 103E-W-01-

103E-W-09

Lab Sample Client Sample Analyte: Wipe Area Total Metal Concentration Narrative Number (ft²) (ug) (ug/ft²) ID

Sample Narratives:

LO1: LCS/LCS D percent recoveries for Se were outside of acceptable control limits.

Analyst: Brittany Meyer

Method: Mercury (Hg): EPA SW846 7471B

All other metals: EPA SW846 3050B/6010D

Reviewed By Authorized Signatory:

Tasha Eaddy

(b) (6)

QA/QC Clerk

Sample Results denoted with a "less than" (<) sign contains less than the reporting limit for each particular metal, based on a 50mL volume. The reporting limit for Cadmium is 0.10ug, Barium, Lead and Silver are 0.50ug, Arsenic and Chromium are 1.0ug, and Selenium is 2.5ug.

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. EHS sample results do not reflect blank correction. This report shall not be reproduced except in full, without the written consent of the Environmental Hazards Service, L.L.C. California Certification #2319 NY ELAP #11714.

Legend ug = microgram ug/ft² = micrograms per square foot

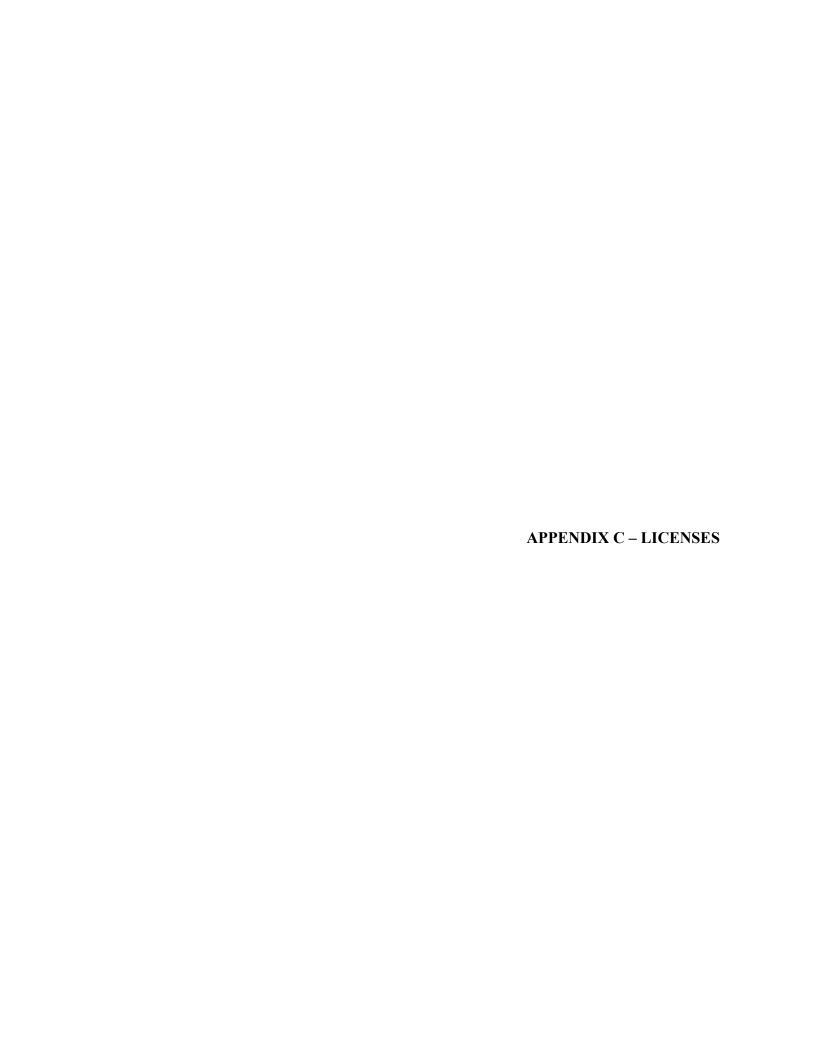
mL = milliliter $ft^2 = square foot$

ENVIRONMENTAL HAZARDS SERVICES, LLC

Metals Chain of Custody Form

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STATE OF MISSOURI DEPARTMENT OF HEALTH AND SENIOR SERVICES

LEAD OCCUPATION LICENSE REGISTRATION

Issued to:

Jeffrey T. Smith

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: 3/16/2019
Expiration Date: 3/16/2021

License Number: 010316-200089640



(b) (6)

Randall W. Williams, MD, FACOG
Director
Department of Health and Senior Services