

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 104F

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 104F 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. 104F was conducted on December 7, 2020 by Emily Ahlemeyer of Burns & McDonnell and Eric Wenger of Burns & McDonnell.

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 9 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	< 0.4	1.2	62
Arsenic	< 0.8	42.0	62
Barium	1.0	74.0	3,094
Cadmium	<0.1	36.0	31
Chromium (Total)	< 0.8	100.0	3,094
Lead	<0.4	2700.0	10 ^(d)
Selenium	<2.0	<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.

Four (4) samples exceeded the lead clean area limit. Samples 104F-W-01, 104F-W-03, 104F-W-07, and 104F-W-08 resulted in lead concentrations of 2,700, 12, 27, and 260 μ g/sq. ft, respectively. One sample exceeded the cadmium clean area limit. Sample 104F-W-01 resulted in a cadmium concentration of 36 μ g/sq. ft. 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.

Sincerely,



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 reenvironmental@gsa.gov.



Appendix A Sample Summary Table

Sample Number	Location	Area Description	Analyte	Result	Units	Clean Area Limit*
104F-W-01	Basement	Pipe chase area floor	Silver	1.2	μg/ft²	62
			Arsenic	42	μg/ft²	62
			Barium	43	μg/ft²	3,094
			Cadmium	36 **	μg/ft²	31
			Chromium	100	μg/ft²	3,094
			Lead	2700 **	μg/ft²	10
			Selenium	< 2.5	μg/ft²	1,236
104F-W-02	1st floor, south office	Top of cubicle	Silver	< 0.50	μg/ft²	62
			Arsenic	< 1.0	μg/ft²	62
			Barium	13	μg/ft²	3,094
			Cadmium	0.42	μg/ft²	31
			Chromium	1.7	μg/ft²	3,094
			Lead	4.9	μg/ft²	10
			Selenium	< 2.5	μg/ft²	1,236
104F-W-03	1st floor, north lobby	Base of stairs	Silver	< 0.50	μg/ft²	62
			Arsenic	< 1.0	μg/ft²	62
			Barium	11	μg/ft²	3,094
			Cadmium	< 0.10	μg/ft²	31
			Chromium	6.9	μg/ft ²	3,094
				12 **	μg/ft ²	10
			Lead Selenium	< 2.5	μg/ft ²	1,236

Appendix A Sample Summary Table

Sample Number	Location	Area Description	Analyte	Resu	t Units	Clean Area Limit*
104F-W-04	2nd floor, north office area	Windowsill	Silver	< 0.40	μg/ft²	62
			Arsenic	< 0.81		62
			Barium	1.1	μg/ft²	3,094
			Cadmium	< 0.083	L $\mu g/ft^2$	31
			Chromium	< 0.81		3,094
			Lead	< 0.40	μg/ft²	10
			Selenium	< 2.0	μg/ft²	1,236
104F-W-05	2nd floor, south conference room	Chair seat on south wall	Silver	< 0.50	μg/ft²	62
			Arsenic	< 1.0	μg/ft²	62
			Barium	1.0	μg/ft²	3,094
			Cadmium	0.10	μg/ft²	31
			Chromium	< 1.0	μg/ft²	3,094
			Lead	< 0.50	μg/ft²	10
			Selenium	< 2.5	μg/ft²	1,236
104F-W-06	2nd floor, south lobby	Floor near door	Silver	< 0.50	μg/ft²	62
			Arsenic	< 1.0	μg/ft²	62
			Barium	1.3	μg/ft²	3,094
			Cadmium	< 0.10		31
			Chromium	< 1.0	μg/ft²	3,094
			Lead	0.96		10
			Selenium	< 2.5	μg/ft²	1,236

Appendix A

Sample Summary Table

Sample Number	Location	Area Description	Analyte	Result	Units	Clean Area Limit*
104F-W-07	Penthouse	Landing outside door	Silver	< 0.50	μg/ft²	62
			Arsenic	1.7	μg/ft²	62
			Barium	28	μg/ft²	3,094
			Cadmium	1.2	μg/ft²	31
			Chromium	5.9	μg/ft²	3,094
			Lead	27 **	μg/ft²	10
			Selenium	< 2.5	μg/ft²	1,236
104F-W-08	Penthouse	Inside door	Silver	< 0.50	μg/ft²	62
			Arsenic	1.2	μg/ft²	62
			Barium	74	μg/ft²	3,094
			Cadmium	1.1	μg/ft²	31
			Chromium	13	μg/ft²	3,094
			Lead	260 **	μg/ft²	10
			Selenium	< 2.5	μg/ft²	1,236
104F-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	1.61	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

^{***} Lead was detected in the field blank at 1.61 µg. This low detection does not significantly change any of the lead results compared to the lead Clean Area Limit; therefore, no blank correction is necessary.





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

Telephone: 800.347.4010

9400 Ward Pkwy. Kansas City, MO 64114

Burns & McDonnell Engineering

Wipe Metals Analysis Report

Report Number: 20-12-01773

Received Date: 12/14/2020 **Analyzed Date:** 12/17/2020 **Reported Date:** 12/17/2020

Project/Test Address: 168765; GFC; 4300 Goodfellow Blvd; 104F-W-01-09

Client Number:

26-3514

Client:

Laboratory Results Fax Number: 816-822-3494

Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft²)	Total Metal (ug)	Concentration (ug/ft²)	Narrative ID
20-12-01773-001	104F-W-01	Arsenic (As)	1.00	42.2	42	L01
		Barium (Ba)	1.00	43.1	43	L01
		Cadmium (Cd)	1.00	36.0	36	L01
		Chromium (Cr)	1.00	104	100	L01
		Lead (Pb)	1.00	2670	2700	L01
		Selenium (Se)	1.00	<2.50	<2.5	L01
		Silver (Ag)	1.00	1.22	1.2	L01
20-12-01773-002	104F-W-02	Arsenic (As)	1.00	<1.00	<1.0	L02
		Barium (Ba)	1.00	12.8	13	L02
		Cadmium (Cd)	1.00	0.420	0.42	L02
		Chromium (Cr)	1.00	1.68	1.7	L02

Client Number:

26-3514

169765: CEC: 4200 Coodfollow Plyd: 104E W 01 00

Report Number:

20-12-01773

04F-W-01-09
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Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft²)	Total Metal (ug)	Concentration (ug/ft²)	Narrative ID
		Lead (Pb)	1.00	4.94	4.9	L02
		Selenium (Se)	1.00	<2.50	<2.5	L02
		Silver (Ag)	1.00	<0.500	<0.50	L02
20-12-01773-003	104F-W-03	Arsenic (As)	1.00	<1.00	<1.0	L02
		Barium (Ba)	1.00	11.2	11	L02
		Cadmium (Cd)	1.00	<0.100	<0.10	L02
		Chromium (Cr)	1.00	6.88	6.9	L02
		Lead (Pb)	1.00	12.0	12	L02
		Selenium (Se)	1.00	<2.50	<2.5	L02
		Silver (Ag)	1.00	<0.500	<0.50	L02
20-12-01773-004	104F-W-04	Arsenic (As)	1.24	<1.00	<0.81	L02
		Barium (Ba)	1.24	1.33	1.1	L02
		Cadmium (Cd)	1.24	<0.100	<0.081	L02
		Chromium (Cr)	1.24	<1.00	<0.81	L02
		Lead (Pb)	1.24	<0.500	<0.40	L02
		Selenium (Se)	1.24	<2.50	<2.0	L02
		Silver (Ag)	1.24	<0.500	<0.40	L02
20-12-01773-005	104F-W-05	Arsenic (As)	1.00	<1.00	<1.0	L02
		Barium (Ba)	1.00	1.03	1.0	L02

Client Number:

26-3514

Project/Test Address: 168765; GFC; 4300 Goodfellow Blvd; 104F-W-01-09

Report Number:

20-12-01773

Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft²)	Total Metal (ug)	Concentration (ug/ft²)	Narrative ID
		Cadmium (Cd)	1.00	0.105	0.10	L02
		Chromium (Cr)	1.00	<1.00	<1.0	L02
		Lead (Pb)	1.00	<0.500	<0.50	L02
		Selenium (Se)	1.00	<2.50	<2.5	L02
		Silver (Ag)	1.00	<0.500	<0.50	L02
20-12-01773-006	104F-W-06	Arsenic (As)	1.00	<1.00	<1.0	L02
		Barium (Ba)	1.00	1.30	1.3	L02
		Cadmium (Cd)	1.00	<0.100	<0.10	L02
		Chromium (Cr)	1.00	<1.00	<1.0	L02
		Lead (Pb)	1.00	0.960	0.96	L02
		Selenium (Se)	1.00	<2.50	<2.5	L02
		Silver (Ag)	1.00	<0.500	<0.50	L02
20-12-01773-007	104F-W-07	Arsenic (As)	1.00	1.68	1.7	L02
		Barium (Ba)	1.00	27.7	28	L02
		Cadmium (Cd)	1.00	1.25	1.2	L02
		Chromium (Cr)	1.00	5.88	5.9	L02
		Lead (Pb)	1.00	27.0	27	L02
		Selenium (Se)	1.00	<2.50	<2.5	L02
		Silver (Ag)	1.00	<0.500	<0.50	L02

Client Number:

26-3514

Project/Test Address: 168765; GFC; 4300 Goodfellow Blvd; 104F-W-01-09

Report Number:

20-12-01773

Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft²)	Total Metal (ug)	Concentration (ug/ft²)	Narrative ID
20-12-01773-008	104F-W-08	Arsenic (As)	1.00	1.23	1.2	L02
		Barium (Ba)	1.00	73.6	74	L02
		Cadmium (Cd)	1.00	1.10	1.1	L02
		Chromium (Cr)	1.00	13.0	13	L02
		Lead (Pb)	1.00	262	260	L02
		Selenium (Se)	1.00	<2.50	<2.5	L02
		Silver (Ag)	1.00	<0.500	<0.50	L02
20-12-01773-009	104F-W-09	Arsenic (As)		<1.00		L02
		Barium (Ba)		<0.500		L02
		Cadmium (Cd)		<0.100		L02
		Chromium (Cr)		<1.00		L02
		Lead (Pb)		1.61		L02
		Selenium (Se)		<2.50		L02
		Silver (Ag)		<0.500		L02

Client Number: 26-3514 **Report Number:** 20-12-01773

Project/Test Address: 168765; GFC; 4300 Goodfellow Blvd; 104F-W-01-09

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

Sample Narratives:

LO1: LCS/LCS D analysis for Se exceeded acceptance limits. Sample was highly reactive to reagents. Some sample loss

occurred, results may be underestimated.

LO2: LCS/LCS D analysis for Se exceeded acceptance limits.

Analyst: Brittany Meyer

Method: Mercury (Hg): EPA SW846 7471B

All other metals: EPA SW846 3050B/6010D

Reviewed By Authorized Signatory:

(b) (6)

Missy Kanode

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

Pg	_ of	

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LAB	Sample ID		Date & Ti	me	Pb TCLP	TCLP RCRA 8	RCRA 8 Total	Toxic Metal Profile	Welding Fume Profile	TX 11 TCLP	CA 17 To	Oth Met		Total Nuisance Dust	Respirable Dust	TSP Gravimetric	TSP Pb	PM-10	Mins	L/min.	Total Liters	Circle The Unit of Measurement Used cm or (in)
1	104F-W-01	12	17/2020	1305								Ag. As, I Cr, P	Ba, Cd,				-		<u>. + . + 41 . 1 </u>			12 × 12
2	104F-W-02	1	1	1315								0,,	<i>b</i> , <i>se</i>									12×12
3	104F-W-03			1320																		12 × 12
4	104F-W-04			1331																		11.5 × 15.5
5	104F-W-05			1336																		12 × 12
6	104F-W-06			1341																		12 x 12
7	104F-W-07			1346																		12 × 12
8	104F-W-08			1349																		12 ×12
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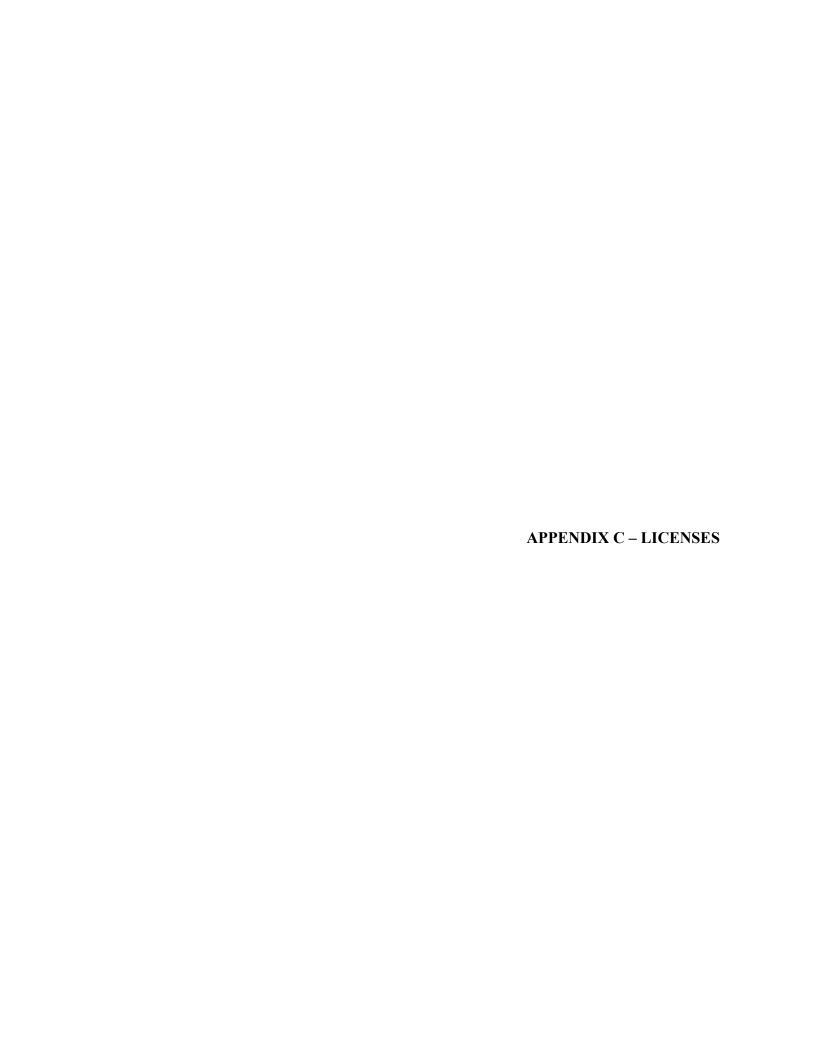
7469 WHITEPINE RD, RICHMOND, VA 23237 (800)-347-4010

RESULTS VIA CLIENT PORTAL AVAILABLE @ www.leadlab.com

20-12-01773

Due Date:

Due Date: 12/17/2020 (Thursday) EL





## Missouri Department of Health and Senior Services

(b) (6)

Lead Occupation License - ID Badge License Number: 080311-300001861

#### Lead Risk Assessor

Eric Wenger

Expiration Date: 03/11/2022

## STATE OF MISSOURI DEPARTMENT OF HEALTH AND SENIOR SERVICES

## **LEAD OCCUPATION LICENSE REGISTRATION**

Issued to:

# Eric N. Wenger

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:

3/11/2020

**Expiration Date:** 

3/11/2022

License Number:

080311-300001861





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

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