



Industrial hygiene sampling was conducted in Buildings 103, 103D, 103E, 104, 104E, 104F, 105, 105E, 105L, 106, 107, and 110 at the Goodfellow Federal Center at 4300 Goodfellow Boulevard in St. Louis, Missouri, from June 6, 2022, through June 15, 2022, in areas throughout the 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 83 air samples collected from within the 12 buildings. No further action is required at this time. The GSA action limit for airborne lead is 1 microgram per cubic meter of air ( $\mu\text{g}/\text{m}^3$ ), which is based on an environmental standard for outside air. This level is more stringent than traditional occupational levels.
- Wipe samples were collected from random interior locations throughout the 12 buildings. Common surfaces and areas accessed by tenants, as well as contractors, were the focus of this sampling event. Results of the dust wipe samples collected from surfaces in the building indicate that detectable concentrations of barium, cadmium, chromium, lead and silver were found in 80 of the 105 samples (see [Federal Center Environmental Reading Room](#) to view all results) in all of the buildings. All levels of barium, cadmium, chromium, 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. However, 6 samples exceeded the threshold for lead, as shown in the tables below. GSA Region 6 follows the [EPA action level](#) of 10 micrograms of lead per square foot ( $\mu\text{g}/\text{ft}^2$ ). No levels of arsenic or selenium were detected in any of the samples.

### Tenant-occupied

Bldg #	Sample Location	Sample Description	Lead ( $\mu\text{g}/\text{ft}^2$ )
105	1st Floor, Warehouse	Floor near column C44	12

### Common space

Bldg #	Sample Location	Sample Description	Lead ( $\mu\text{g}/\text{ft}^2$ )
103E	South Stairwell, Third Landing	Top of tile floor	39
103E	South Stairwell	Handrail between 1st and 2nd floors	75

### **Mechanical Space or Accessed by Facility Contractors Only With SSSPs**

<b>Bldg #</b>	<b>Sample Location</b>	<b>Sample Description</b>	<b>Lead (µg/ft<sup>2</sup>)</b>
104E	2nd Floor, Mechanical Room L48X1	East side Floor	26
110	ICE/JV Warehouse, South work area	Steel work table	29
110	ICE/JV Warehouse, West end	Floor at entrance to Maintenance Office	41

The tenant-occupied space in Building 105 with exceedances is controlled by the tenant agency. This space is a warehouse that is not under the routine cleaning program. Exposures are controlled through a Site-Specific Safety Plan or a tenant cleaning program. GSA will continue to monitor these spaces for contamination.

The common space in the 103E South Stairwell has been tested in past sampling events and was shown to have elevated levels of lead. Elevated levels of lead were again found in this area. Due to this condition, the south stairwell will be used for emergency egress only. The stairwell will not be used as a common access point. Signage will be posted at the main south entrance along with any doors leading into this stairwell. These doors will be locked on the outside at all times and limited to access by personnel with an accepted SSSP.

This letter serves as the Notice for Unsafe/Unhealthful Working Conditions per [29 CFR 1960.26\(c\)\(3\)](#) for the areas found to have elevated levels of lead. This formal notification also complies with [41 CFR 102-80.70](#) to inform building occupants of the condition and management of their facility safety and environment.

**Please ensure all your employees and their respective employee representatives (union) are notified of all of the hazards and the measures used to protect them until the levels can be reduced. To comply with the OSHA [Multi-Employer Policy](#), please ensure your contractors/vendors/visitors are also notified.**

**You should use good hygiene practices while at the Federal Center, which can prevent ingestion of dust. These practices include:**

- **Wash hands frequently.**
- **Use personal protective equipment, when applicable.**
- **Wipe surfaces and property that are not regularly cleaned with a micro-cloth or wet wipe.**

**To prevent transfer of dust to other areas or off-site, and limit exposure to at-risk individuals, consider having a dedicated pair of shoes for wearing only at the facility.**

All test results/reports are available for review in the [Federal Center Environmental Reading Room](#) or in the GSA office, in Building 107. If you have any questions, please feel free to contact GSA at [r6environmental@gsa.gov](mailto:r6environmental@gsa.gov)).