



November 9, 2020  
Diane Czarnecki  
Industrial Hygienist  
Facilities Management Division  
GSA Public Buildings Service – Heartland Region  
2300 Main Street  
Kansas City, MO 64108

Re: Goodfellow Federal Center – Bldg. #105 Drinking Water Sampling  
Project No. 121244

Dear Ms. Czarnecki:

Thank you for the opportunity to provide the General Services Administration (GSA) with the above referenced environmental sampling activities. The following is our report.

## **INTRODUCTION**

As requested, Burns & McDonnell conducted drinking water sampling and testing for the presence of lead and copper at Building #105 of the Goodfellow Federal Center located at 4300 Goodfellow Boulevard in St. Louis, Missouri. Sampling was completed in response to the ongoing environmental condition assessment at the Goodfellow Federal Center which is documented at the Goodfellow Federal Center Reading Room located at <https://www.gsa.gov/portal/content/212361>.

Drinking water sampling was conducted to determine the current levels of lead and copper in representative sources throughout the building. Drinking water sampling at Bldg. #105 was conducted on October 21, 2020 by Nicholas Turnbeaugh of Burns & McDonnell.

## **METHODOLOGY**

The sampling methodology used during this investigation was developed in general accordance with the United States Environmental Protection Agency's (EPA) "Quick Guide to Drinking Water Sample Collection – Second Edition" developed by the EPA Region 8 in September 2016.

Samples were collected as first draw samples at six locations throughout building #105 in accordance with the Lead and Copper Rule (40 CFR Part 141 Subpart I). Additionally, second draw samples were collected at the six locations after allowing the water to run consistently for approximately 2-3 minutes. First draw samples represent 'worst case' conditions with water that has been stationary within the plumbing systems for a minimum of six hours. The samples were collected in individually labeled 1000 milliliter (mL) plastic bottles capped with Teflon septa lined screw caps. The bottles were filled to the shoulder with water from the sample source. The samples were then placed in a cooler for safe transport. Each sample was acidified at the laboratory as needed.

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Drinking water sampling for the presence of lead and copper was conducted at six (6) distinct locations within Building #105. A total of twelve (12) samples were obtained including second draw samples. After each drinking water sample was collected, Burns & McDonnell filled a separate sample cup with approximately 2 inches of water. Burns & McDonnell placed a VANTAKOOL pH Meter and a Taylor 9842 temperature probe into the sample cup. After readings stabilized, Burns & McDonnell recorded the readings for pH (the acidity or basicity of an aqueous solution) and the temperature (in degrees Celsius) on site specific sample logs.

Drinking water samples were submitted to Eurofins-Eaton Analytical in South Bend, IN for analyses of lead and copper. Eurofins-Eaton Analytical is certified by the State of Missouri Department of Natural Resources (MDNR) as an approved drinking water laboratory. Eurofins-Eaton Analytical's Missouri Certification number is 880.

The drinking water samples were collected using media supplied by Eurofins-Eaton Analytical. Lead and Copper samples were collected and analyzed in accordance with EPA Method 200.8.

## RESULTS AND DISCUSSION

The results for the subject testing are summarized in the table below.

Analysis	Lowest Concentration	Highest Concentration	Action Level <sup>(b)</sup>
Lead	2.8 µg/L	62 µg/L	15 µg/L
Copper	32 µg/L	130 µg/L	1300 µg/L

Notes:

(a) As per EPA Lead and Copper Rule (40 CFR Part 141 Subpart I).

A summary table of all sampling results by location is included in Appendix A. The complete laboratory report for the drinking water sampling from Eurofins-Eaton Analytical is attached in Appendix B.

### Lead

Five (5) samples exceeded the Action Level (AL) for lead. Specific sample locations and concentrations are presented in Appendix A. The samples that exceeded the AL for lead were from laboratory sinks.

### Copper

All samples were below the AL for copper.



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## **pH**

Normal pH levels for drinking water are between 6.0 to 8.5. Water with a pH < 6.5 is considered acidic, soft, and corrosive. Acidic water may contain metal ions, may cause premature damage to metal piping, and increases the likelihood of leaching. Water with a pH > 8.5 is considered alkaline or basic and can indicate that the water is hard. Hard water does not pose a health risk but can cause aesthetic problems. These problems include an alkali taste, the formation of scale deposits, and difficulty in getting soaps and detergents to lather.

Recorded pH levels in Building #105 ranged from 8.54 to 9.16 indicating the drinking water is slightly alkaline.

## **LIMITATIONS**

The scope of this assessment was limited in nature. Burns & McDonnell collected samples from a select number of drinking water sources in an effort to minimize cost while providing a general overview of the drinking water quality at the site. Sample locations do not encompass every drinking water source at the Site. Additionally, samples were only analyzed for a select number of potential contaminants likely to affect the drinking water quality at the site. Burns & McDonnell is not responsible for potential contaminants not identified in this report.

This report was prepared for the sole use of GSA. Reliance by any party other than GSA is expressly forbidden without Burns & McDonnell's written permission. Any parties relying on the report, with Burns & McDonnell's written permission, are bound by the terms and conditions outlined in the original proposal as if said proposal was prepared for them.

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

Sincerely,

(b) (6)

Matt Shanahan, CHMM  
Project Manager

Attachments:

- Appendix A - Results Summary by Location
- Appendix B - Water Sample Laboratory Report

**APPENDIX A – RESULTS SUMMARY BY LOCATION**

## Appendix A

### Results Summary by Location

Goodfellow Federal Center - Building 105											
Sample Number	Location	pH	Temp (°C)	Water Source	Analyte	Result	Units	MRL	Dil Factor	Above/Below	AL
105-DW-01	Lab 356, corner sink, first draw	8.80	17.8	Sink	Copper	130	µg/L	1.0	1	Below	1300
					Lead	62	µg/L	1.0	1	Above	15
105-DW-02	Lab 356, corner sink, second draw	9.16	18.4	Sink	Copper	32	µg/L	1.0	1	Below	1300
					Lead	5.1	µg/L	1.0	1	Below	15
105-DW-03	Lab 333, corner sink, first draw	8.85	17.8	Sink	Copper	50	µg/L	1.0	1	Below	1300
					Lead	9.7	µg/L	1.0	1	Below	15
105-DW-04	Lab 333, corner sink, second draw	8.98	17.6	Sink	Copper	100	µg/L	1.0	1	Below	1300
					Lead	48	µg/L	1.0	1	Above	15
105-DW-05	Lab 318, corner sink, first draw	9.06	18.0	Sink	Copper	38	µg/L	1.0	1	Below	1300
					Lead	2.8	µg/L	1.0	1	Below	15
105-DW-06	Lab 318, corner sink, second draw	9.10	18.2	Sink	Copper	44	µg/L	1.0	1	Below	1300
					Lead	6.0	µg/L	1.0	1	Below	15
105-DW-07	Lab 337, north sink, first draw	8.75	18.3	Sink	Copper	37	µg/L	1.0	1	Below	1300
					Lead	34	µg/L	1.0	1	Above	15
105-DW-08	Lab 337, north sink, second draw	9.15	18.1	Sink	Copper	25	µg/L	1.0	1	Below	1300
					Lead	7.7	µg/L	1.0	1	Below	15
105-DW-09	Lab 324, corner sink, first draw	8.87	17.7	Sink	Copper	130	µg/L	1.0	1	Below	1300
					Lead	48	µg/L	1.0	1	Above	15
105-DW-10	Lab 324, corner sink, second draw	8.86	17.8	Sink	Copper	54	µg/L	1.0	1	Below	1300
					Lead	7.5	µg/L	1.0	1	Below	15
105-DW-11	Lab 329, west sink, first draw	8.54	17.7	Sink	Copper	44	µg/L	1.0	1	Below	1300
					Lead	32	µg/L	1.0	1	Above	15
105-DW-12	Lab 329, west sink, second draw	8.88	17.8	Sink	Copper	75	µg/L	1.0	1	Below	1300
					Lead	10	µg/L	1.0	1	Below	15

Notes:

Dil - Dilution

AL - Action Level

µg/L - micrograms per liter

MRL - Method Reporting Limit

**APPENDIX B – WATER SAMPLE LABORATORY REPORT**

## LABORATORY REPORT

If you have any questions concerning this report, please do not hesitate to call us at (800) 332-4345 or (574) 233-4777.

*This report may not be reproduced, except in full, without written approval from EEA.*

## STATE CERTIFICATION LIST

State	Certification	State	Certification
Alabama	40700	Missouri	880
Alaska	IN00035	Montana	CERT0026
Arizona	AZ0432	Nebraska	NE-OS-05-04
Arkansas	IN00035	Nevada	IN00035
California	2920	New Hampshire*	2124
Colorado	IN00035	New Jersey*	IN598
Colorado Radiochemistry	IN00035	New Mexico	IN00035
Connecticut	PH-0132	New York*	11398
Delaware	IN035	North Carolina	18700
Florida(Primary AB)*	E87775	North Dakota	R-035
Georgia	929	Ohio	87775
Hawaii	IN035	Oklahoma	D9508
Idaho	IN00035	Oregon*	4156
Illinois*	200001	Pennsylvania*	68-00466
Illinois Microbiology	17767	Puerto Rico	IN00035
Illinois Radiochemistry	IN00035	Rhode Island	LAO00343
Indiana Chemistry	C-71-01	South Carolina	95005
Indiana Microbiology	M-76-07	South Dakota	IN00035
Iowa	098	Tennessee	TN02973
Kansas*	E-10233	Texas*	T104704187
Kentucky	90056	Texas/TCEQ	TX207
Louisiana*	LA014	Utah*	IN00035
Maine	IN00035	Vermont	VT-8775
Maryland	209	Virginia*	460275
Massachusetts	M-IN035	Washington	C837
Michigan	9926	West Virginia	9927 C
Minnesota*	018-999-338	Wisconsin	999766900
Mississippi	IN035	Wyoming	IN035
EPA	IN00035		

\*NELAP/TNI Recognized Accreditation Bodies



110 South Hill Street  
 South Bend, IN 46617  
 Tel: (574) 233-4777  
 Fax: (574) 233-8207  
 1 800 332 4345

## Laboratory Report

Client: Burns & McDonnell Engineers  
 Attn: Emily Ahlemeyer  
 425 South Woods Mill Road  
 Suite 300  
 Chesterfield, MO 63017

Report: 501988  
 Priority: Standard Written  
 Status: Final  
 PWS ID: Not Supplied

Sample Information					
EEA ID #	Client ID	Method	Collected Date / Time	Collected By:	Received Date / Time
4758989	105-DW-1	200.8	10/21/20 07:30	Client	10/23/20 08:30
4758990	105-DW-2	200.8	10/21/20 07:32	Client	10/23/20 08:30
4758991	105-DW-3	200.8	10/21/20 07:36	Client	10/23/20 08:30
4758992	105-DW-4	200.8	10/21/20 07:39	Client	10/23/20 08:30
4758993	105-DW-5	200.8	10/21/20 07:40	Client	10/23/20 08:30
4758994	105-DW-6	200.8	10/21/20 07:42	Client	10/23/20 08:30
4758995	105-DW-7	200.8	10/21/20 07:44	Client	10/23/20 08:30
4758996	105-DW-8	200.8	10/21/20 07:46	Client	10/23/20 08:30
4758997	105-DW-9	200.8	10/21/20 07:47	Client	10/23/20 08:30
4758998	105-DW-10	200.8	10/21/20 07:49	Client	10/23/20 08:30
4758999	105-DW-11	200.8	10/21/20 07:52	Client	10/23/20 08:30
4759000	105-DW-12	200.8	10/21/20 07:55	Client	10/23/20 08:30

### Report Summary

Detailed quantitative results are presented on the following pages. The results presented relate only to the samples provided for analysis.

We appreciate the opportunity to provide you with this analysis. If you have any questions concerning this report, please do not hesitate to call Pat Muff at (574) 233-4777.

*Note: This report may not be reproduced, except in full, without written approval from EEA.*

(b) (6)



11/02/2020

Authorized Signature

Title

Date

Client Name: Burns & McDonnell Engineers

Report #: 501988

Sampling Point: 105-DW-1

PWS ID: Not Supplied

Lead and Copper									
Analyte ID #	Analyte	Method	Reg Limit	MRL†	Result	Units	Preparation Date	Analyzed	EEA ID #
7440-50-8	Copper	200.8	1300 !	1.0	130	ug/L	---	10/28/20 18:31	4758989
7439-92-1	Lead	200.8	15 !	1.0	62	ug/L	---	10/28/20 18:31	4758989

Sampling Point: 105-DW-2

PWS ID: Not Supplied

Lead and Copper									
Analyte ID #	Analyte	Method	Reg Limit	MRL†	Result	Units	Preparation Date	Analyzed	EEA ID #
7440-50-8	Copper	200.8	1300 !	1.0	32	ug/L	---	10/28/20 18:33	4758990
7439-92-1	Lead	200.8	15 !	1.0	5.1	ug/L	---	10/28/20 18:33	4758990

Sampling Point: 105-DW-3

PWS ID: Not Supplied

Lead and Copper									
Analyte ID #	Analyte	Method	Reg Limit	MRL†	Result	Units	Preparation Date	Analyzed	EEA ID #
7440-50-8	Copper	200.8	1300 !	1.0	50	ug/L	---	10/28/20 18:43	4758991
7439-92-1	Lead	200.8	15 !	1.0	9.7	ug/L	---	10/28/20 18:43	4758991

Sampling Point: 105-DW-4

PWS ID: Not Supplied

Lead and Copper									
Analyte ID #	Analyte	Method	Reg Limit	MRL†	Result	Units	Preparation Date	Analyzed	EEA ID #
7440-50-8	Copper	200.8	1300 !	1.0	100	ug/L	---	10/28/20 18:45	4758992
7439-92-1	Lead	200.8	15 !	1.0	48	ug/L	---	10/28/20 18:45	4758992

Sampling Point: 105-DW-5

PWS ID: Not Supplied

Lead and Copper									
Analyte ID #	Analyte	Method	Reg Limit	MRL†	Result	Units	Preparation Date	Analyzed	EEA ID #
7440-50-8	Copper	200.8	1300 !	1.0	38	ug/L	---	10/28/20 18:48	4758993
7439-92-1	Lead	200.8	15 !	1.0	2.8	ug/L	---	10/28/20 18:48	4758993

Sampling Point: 105-DW-6

PWS ID: Not Supplied

Lead and Copper									
Analyte ID #	Analyte	Method	Reg Limit	MRL†	Result	Units	Preparation Date	Analyzed	EEA ID #
7440-50-8	Copper	200.8	1300 !	1.0	44	ug/L	---	10/28/20 18:51	4758994
7439-92-1	Lead	200.8	15 !	1.0	6.0	ug/L	---	10/28/20 18:51	4758994

Sampling Point: 105-DW-7

PWS ID: Not Supplied

Lead and Copper									
Analyte ID #	Analyte	Method	Reg Limit	MRL†	Result	Units	Preparation Date	Analyzed	EEA ID #
7440-50-8	Copper	200.8	1300 !	1.0	37	ug/L	---	10/28/20 18:54	4758995
7439-92-1	Lead	200.8	15 !	1.0	34	ug/L	---	10/28/20 18:54	4758995

Sampling Point: 105-DW-8

PWS ID: Not Supplied

Lead and Copper									
Analyte ID #	Analyte	Method	Reg Limit	MRL†	Result	Units	Preparation Date	Analyzed	EEA ID #
7440-50-8	Copper	200.8	1300 !	1.0	25	ug/L	---	10/28/20 18:57	4758996
7439-92-1	Lead	200.8	15 !	1.0	7.7	ug/L	---	10/28/20 18:57	4758996

Sampling Point: 105-DW-9

PWS ID: Not Supplied

Lead and Copper									
Analyte ID #	Analyte	Method	Reg Limit	MRL†	Result	Units	Preparation Date	Analyzed	EEA ID #
7440-50-8	Copper	200.8	1300 !	1.0	130	ug/L	---	10/28/20 19:00	4758997
7439-92-1	Lead	200.8	15 !	1.0	48	ug/L	---	10/28/20 19:00	4758997

Sampling Point: 105-DW-10

PWS ID: Not Supplied

Lead and Copper									
Analyte ID #	Analyte	Method	Reg Limit	MRL†	Result	Units	Preparation Date	Analyzed	EEA ID #
7440-50-8	Copper	200.8	1300 !	1.0	54	ug/L	---	10/28/20 19:03	4758998
7439-92-1	Lead	200.8	15 !	1.0	7.5	ug/L	---	10/28/20 19:03	4758998

Sampling Point: 105-DW-11

PWS ID: Not Supplied

Lead and Copper									
Analyte ID #	Analyte	Method	Reg Limit	MRL†	Result	Units	Preparation Date	Analyzed	EEA ID #
7440-50-8	Copper	200.8	1300 !	1.0	44	ug/L	---	10/28/20 19:12	4758999
7439-92-1	Lead	200.8	15 !	1.0	32	ug/L	---	10/28/20 19:12	4758999

Sampling Point: 105-DW-12

PWS ID: Not Supplied

Lead and Copper									
Analyte ID #	Analyte	Method	Reg Limit	MRL†	Result	Units	Preparation Date	Analyzed	EEA ID #
7440-50-8	Copper	200.8	1300 !	1.0	75	ug/L	---	10/28/20 19:15	4759000
7439-92-1	Lead	200.8	15 !	1.0	10	ug/L	---	10/28/20 19:15	4759000

† EEA has demonstrated it can achieve these report limits in reagent water, but can not document them in all sample matrices.

<b>Reg Limit Type:</b>	MCL	SMCL	AL
<b>Symbol:</b>	*	^	!

## Lab Definitions

**Continuing Calibration Check Standard (CCC) / Continuing Calibration Verification (CCV) / Initial Calibration Verification Standard (ICV) / Initial Performance Check (IPC)** - is a standard containing one or more of the target analytes that is prepared from the same standards used to calibrate the instrument. This standard is used to verify the calibration curve at the beginning of each analytical sequence, and may also be analyzed throughout and at the end of the sequence. The concentration of continuing standards may be varied, when prescribed by the reference method, so that the range of the calibration curve is verified on a regular basis. CCL, CCM, and CCH are the CCC standards at low, mid, and high concentration levels, respectively.

**Internal Standards (IS)** - are pure compounds with properties similar to the analytes of interest, which are added to field samples or extracts, calibration standards, and quality control standards at a known concentration. They are used to measure the relative responses of the analytes of interest and surrogates in the sample, calibration standard or quality control standard.

**Laboratory Duplicate (LD)** - is a field sample aliquot taken from the same sample container in the laboratory and analyzed separately using identical procedures. Analysis of laboratory duplicates provides a measure of the precision of the laboratory procedures.

**Laboratory Fortified Blank (LFB) / Laboratory Control Sample (LCS)** - is an aliquot of reagent water to which known concentrations of the analytes of interest are added. The LFB is analyzed exactly the same as the field samples. LFBs are used to determine whether the method is in control. FBL, FBM, and FBH are the LFB samples at low, mid, and high concentration levels, respectively.

**Laboratory Method Blank (LMB) / Laboratory Reagent Blank (LRB)** - is a sample of reagent water included in the sample batch analyzed in the same way as the associated field samples. The LMB is used to determine if method analytes or other background contamination have been introduced during the preparation or analytical procedure. The LMB is analyzed exactly the same as the field samples.

**Laboratory Trip Blank (LTB) / Field Reagent Blank (FRB)** - is a sample of laboratory reagent water placed in a sample container in the laboratory and treated as a field sample, including storage, preservation, and all analytical procedures. The FRB/LTB container follows the collection bottles to and from the collection site, but the FRB/LTB is not opened at any time during the trip. The FRB/LTB is primarily a travel blank used to verify that the samples were not contaminated during shipment.

If applicable, the calculation of the matrix spike (MS) or matrix spike duplicate (MSD) percent recovery is as follows:  $(MS \text{ or } MSD \text{ value} - \text{Sample value}) * 100 / \text{spike target} / \text{dilution factor} = \text{Recovery } \%$

**Matrix Spike Duplicate Sample (MSD) / Laboratory Fortified Sample Matrix Duplicate (LFSMD)** - is a sample aliquot taken from the same field sample source as the Matrix Spike Sample to which known quantities of the analytes of interest are added in the laboratory. The MSD is analyzed exactly the same as the field samples. Analysis of the MSD provides a measure of the precision of the laboratory procedures in a specific matrix. SDL, SDM, and SDH / LFSMDL, LFSMDM, and LFSMDH are the MSD or LFSMD at low, mid, and high concentration levels, respectively.

**Matrix Spike Sample (MS) / Laboratory Fortified Sample Matrix (LFSM)** - is a sample aliquot taken from field sample source to which known quantities of the analytes of interest are added in the laboratory. The MS is analyzed exactly the same as the field samples. The purpose is to demonstrate recovery of the analytes from a sample matrix to determine if the specific matrix contributes bias to the analytical results. MSL, MSM, and MSH / LFSML, LFSMM, and LFSMH are the MS or LFSM at low, mid, and high concentration levels, respectively.

**Quality Control Standard (QCS) / Second Source Calibration Verification (SSCV)** - is a solution containing known concentrations of the analytes of interest prepared from a source different from the source of the calibration standards. The solution is obtained from a second manufacturer or lot if the lot can be demonstrated by the manufacturer as prepared independently from other lots. The QCS sample is analyzed using the same procedures as field samples. The QCS is used as a check on the calibration standards used in the method on a routine basis.

**Reporting Limit Check (RLC) / Initial Calibration Check Standard (ICCS)** - is a procedural standard that is analyzed each day to evaluate instrument performance at or below the minimum reporting limit (MRL).

**Surrogate Standard (SS) / Surrogate Analyte (SUR)** - is a pure compound with properties similar to the analytes of interest, which is highly unlikely to be found in any field sample, that is added to the field samples, calibration standards, blanks and quality control standards before sample preparation. The SS is used to evaluate the efficiency of the sample preparation process.



Eaton Analytical

110 S. Hill Street  
South Bend, IN 46617  
T: 1.800.332.4345  
F: 1.574.233.8207

406917  
Order # 5714023  
Batch # 501988

www.EurofinsUS.com/Eaton

Shaded area for EEA use only

### CHAIN OF CUSTODY RECORD

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REPORT TO: *ASHLEY@Eaton.com* (Signature)

9400 World Parkway  
Kansas City, MO 64114

BILL TO:

Same

COMPLIANCE MONITORING  
YES  NO

STATE (sample origin)  
MO  
SOURCE WATER  
Municipal

PROJECT NAME  
GFC

PO#  
121244

MATRIX CODE  
TURNDOWN TIME

LAB Number	COLLECTION		SAMPLING SITE	TEST NAME	CHLORINATED	# OF CONTAINERS	MATRIX CODE
	DATE	TIME					
1	10/21/20	0730	105 - DW - 1	Lead and Copper	X	1	DW SW
2		0732	105 - DW - 2		X		
3		0736	105 - DW - 3		X		
4		0739	105 - DW - 4		X		
5		0740	105 - DW - 5		X		
6		0742	105 - DW - 6		X		
7		0744	105 - DW - 7		X		
8		0746	105 - DW - 8		X		
9		0747	105 - DW - 9		X		
10		0749	105 - DW - 10		X		
11		0752	105 - DW - 11		X		
12		0755	105 - DW - 12		X		
13							
14							

LAB COMMENTS: LAB RESERVES THE RIGHT TO RETURN UNUSED PORTIONS OF NON-AQUEOUS SAMPLES TO CLIENT

RELINQUISHED BY: (Signature) [Signature] DATE [ ] TIME [ ] AM | PM

RECEIVED BY: (Signature) [Signature] DATE [ ] TIME [ ] AM | PM

RECEIVED FOR LABORATORY BY: [Signature] DATE [ ] TIME [ ] AM | PM

CONDITIONS UPON RECEIPT (check one):  
 Iced:  Ambient:  °C Upon Receipt:  N/A

MATRIX CODES:  
 DW-DRINKING WATER  
 RW-REAGENT WATER  
 GW-GROUND WATER  
 EW-EXPOSURE WATER  
 SW-SURFACE WATER  
 PW-POOL WATER  
 WW-WASTE WATER

TURN-AROUND TIME (TAT) - SURCHARGES:  
 SW = Standard Written: (15 working days) 0%  
 RV = Rush Verbal: (5 working days) 50%  
 RW = Rush Written: (5 working days) 75%

IV\* = Immediate Verbal: (3 working days) 100%  
 IW\* = Immediate Written: (3 working days) 125%  
 SP\* = Weekend, Holiday  
 STAT\* = Less than 48 hours

\* Please call, expedited service not available for all testing

Sample analysis will be provided according to the standard EEA/Water Services Terms, which are available upon request. Any other terms proposed by Customer are deemed material alterations and are rejected unless expressly agreed to in writing by EEA.