

**April 2019**

In an ongoing effort to keep stakeholders informed about the [Goodfellow Environmental Project](#), the GSA Region 6 Environmental Team would like to provide an update to [subscribers](#), following a [GSA OIG audit](#) released March 15, 2019.

As a reminder, GSA's records related to environmental sampling, OSHA correspondence, and GSA's previous 14 Stakeholder Memos with informational updates are available in the [Goodfellow Federal Center online reading room](#) and in GSA's Field Office, Building 107.



### **Background**

In July of 2016, the [Occupational Safety and Health Administration \(OSHA\)](#) cited as deficient seven items at the Federal Center, which PBS has successfully addressed. On November 2, 2016, the GSA OIG's Office of Audits initiated the [audit](#) to evaluate PBS's response to environmental issues identified at the Goodfellow complex prior to the OSHA notice and specifically to determine whether 1) PBS informed building tenants, contractors, and visitors about identified environmental hazards at the Goodfellow Complex; and 2) PBS's response to the identified hazards accorded with applicable laws, regulations, and policies.

### **Audit Recommendations**

The audit findings focused on more thorough programs and policies to ensure compliance and did not identify any additional contaminants that GSA is not already managing. The audit also did not address GSA's Site Specific Safety Plan process GSA uses to manage the contaminants at the Federal Center.

The audit results included the following six recommendations. The auditors recommended that the PBS Commissioner:

1. Conduct a comprehensive assessment of the PBS Occupational Safety and Health Program, focusing on the program's ability to ensure compliance with applicable occupational safety and health requirements. Take corrective action to address any weaknesses identified through the assessment.
2. Finalize updates to the GSA Occupational Safety and Health Program Order to ensure transparency and adherence to OSHA requirements regarding environmental contamination in PBS facilities.

The auditors also recommended that the PBS Regional Commissioner institute controls to ensure that:

1. The safety of tenants, contractors, and visitors to the Goodfellow complex is protected by preventing exposure to all hazards and posting safety plans when appropriate.
2. PBS has a complete and publicly accessible repository for all environmental studies conducted on any and all of its properties in the Heartland Region.
3. All health, safety, and environmental studies are distributed upon completion to the occupants of any Heartland Region property where studies are performed.
4. Corrective action is taken and publicly disclosed in response to all health, safety, and environmental studies performed within the Heartland Region.

### **Looking ahead**

GSA will submit its corrective action plan to the OIG on or before May 15, which will then be available in GSA's [Goodfellow Federal Center online reading room](#) and in Building 107.

In regard to the day-to-day occupancy of GSA buildings at the Federal Center, tenants, contractors, and visitors should not experience different procedures from the existing Site Specific Safety Plan (SSSP) to manage the contaminants. GSA plans to continue periodic air and wipe sampling in tenant spaces to evaluate the effectiveness of the SSSP process and associated controls. In addition to managing the contaminants inside of the buildings, GSA continues to manage contaminants that are exterior to the buildings under the Comprehensive Environmental Response, Compensation, and Liability Act, with oversight from Missouri Department of Natural Resources.

**Reminder**

All of GSA's records of environmental sampling and analysis of the Goodfellow Federal Center in St. Louis from 2002 to present are available in the [Goodfellow Federal Center online reading room](#) and GSA's Field Office in Building 107. Chronologically organized stakeholder memos, OSHA, and other records are also available in the reading rooms.

If you have any questions, please email [r6environmental@gsa.gov](mailto:r6environmental@gsa.gov). Stakeholders can subscribe to these updates by sending a request to [r6environmental@gsa.gov](mailto:r6environmental@gsa.gov) or using our [Federal Center Email Sign-Up](#). Thank you.

GSA Region 6 Environmental Team

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