7/10/2024

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 105L
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 105L 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. 105L was conducted on June 5, 2024 by Ashley Anstaett 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

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. 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 5 of the 6 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.

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	<0.5	62
Arsenic	<2.4	2.9	62
Barium	3.0	21.0	3,094
Cadmium	<0.1	9.1	31
Chromium (Total)	<1.0	2.2	3,094
Lead	<0.5	54.0	10 [d]
Selenium	<2.4	<2.5	1,236

(a) Samples with a "<" sign indicate that the results were below the laboratory's reporting limit.
(b) µg/sq. ft = micrograms per square foot of surface area.
(c) Clean Area Limit per Brookhaven IH75190=OSHA Housekeeping Limit [[PEL ($\mu g/m^3$) x 10 $m^3/100cm^2$] x 929cm^2/sq.ft.] / 15.
(d) Lead clean area limit: Brookhaven references EPA/HUD limit for floors, set at 10 µg/sq. ft. as of January 2020.

Of the 5 samples that had detectable levels of one or more analytes, 2 of them exceeded the clean area limit.

1. A sample taken from the floor in front of the storage cage in the southwest storage room had 54 $\mu g/ft^2$ of lead.
2. A sample taken from the top of a brown leather chair on the west wall of the auditorium had 26 $\mu g/ft^2$ of lead.

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,

(b) (6) [redacted]

Matt Shanahan, CHMM
Project Manager

Attachments:
Appendix A – Sample Summary Table

Appendix B – Laboratory Analysis Report

Information in Appendices A and B 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 r6environmental@gsa.gov.

APPENDIX A – SAMPLE SUMMARY TABLE

Appendix A
Sample Summary Table

Sample Number	Location	Area Description	Analyte	Result	Units	Clean Area Limit*
105L-W-01	Auditorium	Top of wooden handrail	Arsenic	< 2.5	µg/ft^2	62
			Barium	3.0	µg/ft^2	3,094
			Cadmium	0.20	µg/ft^2	31
			Chromium	< 1.0	µg/ft^2	3,094
			Lead	1.1	µg/ft^2	10
			Selenium	< 2.5	µg/ft^2	1,236
			Silver	< 0.50	µg/ft^2	62
105L-W-02	Southwest room	Floor in front of storage cage	Arsenic	< 2.5	µg/ft^2	62
			Barium	21	µg/ft^2	3,094
			Cadmium	0.66	µg/ft^2	31
			Chromium	2.2	µg/ft^2	3,094
			Lead	54	µg/ft^2	10
			Selenium	< 2.5	µg/ft^2	1,236
			Silver	< 0.50	µg/ft^2	62
105L-W-03	Auditorium	Top of brown leather chair on west wall	Arsenic	2.9	µg/ft^2	62
			Barium	6.3	µg/ft^2	3,094
			Cadmium	9.1	µg/ft^2	31
			Chromium	< 1.0	µg/ft^2	3,094
			Lead	26	µg/ft^2	10
			Selenium	< 2.5	µg/ft^2	1,236
			Silver	< 0.50	µg/ft^2	62
105L-W-04	Break room	Top of long table on north wall	Arsenic	< 2.5	µg/ft^2	62
			Barium	5.0	µg/ft^2	3,094
			Cadmium	< 0.10	µg/ft^2	31
			Chromium	< 1.0	µg/ft^2	3,094
			Lead	< 0.50	µg/ft^2	10
			Selenium	< 2.5	µg/ft^2	1,236
			Silver	< 0.50	µg/ft^2	62

Appendix A
Sample Summary Table

Sample Number	Location	Area Description	Analyte	Result	Units	Clean Area Limit*
105L-W-05	Room 107	Top of bookshelf on south wall	Arsenic	< 2.4	µg/ft^2	62
			Barium	7.6	µg/ft^2	3,094
			Cadmium	< 0.096	µg/ft^2	31
			Chromium	< 0.96	µg/ft^2	3,094
			Lead	0.68	µg/ft^2	10
			Selenium	< 2.4	µg/ft^2	1,236
			Silver	< 0.48	µg/ft^2	62
105L-W-06	Field blank	--	Arsenic	< 2.50	µg	--
			Barium	< 0.500	µg	--
			Cadmium	< 0.100	µg	--
			Chromium	< 1.00	µg	--
			Lead	< 0.500	µg	--
			Selenium	< 2.50	µg	--
			Silver	< 0.500	µg	--

* Clean Area Limit per Brookhaven IH75190=OSHA Housekeeping Limit [[PEL (µg/m^3) x 10 m^3/100cm^2] x 929cm^2/sq. ft.] / 15. Lead clean area limit: Brookhaven references EPA/HUD limit for floors, set at 10 µg/sq. ft. as of January 2020.

** Indicates results at or above the Clean Area Limit

APPENDIX B – LABORATORY ANALYSIS REPORT

EHS Laboratories
ENVIRONMENTAL HAZARDS SERVICES, LLC
7469 Whitepine Rd
North Chesterfield, VA 23237
Telephone: 800.347.4010

Wipe Metals Analysis Report

Client: Burns & McDonnell Engineering
9400 Ward Pkwy.
Kansas City, MO 64114

Report Number: 24-06-01638

Received Date: 06/11/2024
Analyzed Date: 06/14/2024
Reported Date: 06/18/2024

Project/Test Address: 168765; GFC; 4300 Goodfellow Blvd

Client Number:
26-3514

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
24-06-01638-001	105L-W-01	Arsenic (As)	1.00	<2.50	<2.5	L01
		Barium (Ba)	1.00	3.05	3.0	L01
		Cadmium (Cd)	1.00	0.195	0.20	L01
		Chromium (Cr)	1.00	<1.00	<1.0	L01
		Lead (Pb)	1.00	1.11	1.1	L01
		Selenium (Se)	1.00	<2.50	<2.5	L01
		Silver (Ag)	1.00	<0.500	<0.50	L01
24-06-01638-002	105L-W-02	Arsenic (As)	1.00	<2.50	<2.5	L01
		Barium (Ba)	1.00	21.3	21	L01
		Cadmium (Cd)	1.00	0.655	0.66	L01
		Chromium (Cr)	1.00	2.15	2.2	L01

Client Number: 26-3514 **Report Number:** 24-06-01638

Project/Test Address: 168765; GFC; 4300 Goodfellow Blvd

Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft^2)	Total Metal (ug)	Concentration (ug/ft^2)	Narrative ID
		Lead (Pb)	1.00	54.2	54	L01
		Selenium (Se)	1.00	<2.50	<2.5	L01
		Silver (Ag)	1.00	<0.500	<0.50	L01
24-06-01638-003	105L-W-03	Arsenic (As)	1.00	2.86	2.9	L01
		Barium (Ba)	1.00	6.28	6.3	L01
		Cadmium (Cd)	1.00	9.06	9.1	L01
		Chromium (Cr)	1.00	<1.00	<1.0	L01
		Lead (Pb)	1.00	25.9	26	L01
		Selenium (Se)	1.00	<2.50	<2.5	L01
		Silver (Ag)	1.00	<0.500	<0.50	L01
24-06-01638-004	105L-W-04	Arsenic (As)	1.00	<2.50	<2.5	L01
		Barium (Ba)	1.00	5.02	5.0	L01
		Cadmium (Cd)	1.00	<0.100	<0.10	L01
		Chromium (Cr)	1.00	<1.00	<1.0	L01
		Lead (Pb)	1.00	<0.500	<0.50	L01
		Selenium (Se)	1.00	<2.50	<2.5	L01
		Silver (Ag)	1.00	<0.500	<0.50	L01
24-06-01638-005	105L-W-05	Arsenic (As)	1.04	<2.50	<2.4	L01
		Barium (Ba)	1.04	7.86	7.6	L01

Client Number: 26-3514 **Report Number:** 24-06-01638

Project/Test Address: 168765; GFC; 4300 Goodfellow Blvd

Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft^2)	Total Metal (ug)	Concentration (ug/ft^2)	Narrative ID
		Cadmium (Cd)	1.04	<0.100	<0.096	L01
		Chromium (Cr)	1.04	<1.00	<0.96	L01
		Lead (Pb)	1.04	0.705	0.68	L01
		Selenium (Se)	1.04	<2.50	<2.4	L01
		Silver (Ag)	1.04	<0.500	<0.48	L01
24-06-01638-006	105L-W-06	Arsenic (As)		<2.50	---	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

Environmental Hazards Services, L.L.C

Client Number: 26-3514 **Report Number:** 24-06-01638

Project/Test Address: 168765; GFC; 4300 Goodfellow Blvd

Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft^2)	Total Metal (ug)	Concentration (ug/ft^2)	Narrative ID

Sample Narratives:

L01: LCS and LCSD percent recovery for Se were outside of acceptance limits.

Analyst: Carlos Gonzalez

Method: EPA SW846 3050B/6010D

Reviewed By Authorized Signatory: (b) (6) [redacted]

Tasha Eaddy

QA/QC Clerk

Sample Results denoted with a "less than" (<) sign contains less than the reporting limit based on a 50mL volume. The reporting limit for Lead is 0.5ug.

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. These sample results do not reflect blank correction. This report shall not be reproduced except in full, without the written consent of Environmental Hazards Services, L.L.C.

Legend	ug = microgram	ug/ft^2 = micrograms per square foot
	mL = milliliter	ft^2 = square foot

ENVIRONMENTAL HAZARDS SERVICES, LLC

Metals Chain of Custody Form

Pg 1 of 1

Company Name	Burns & McDonnell	Account #	26-3514
Company Address	9400 Ward Parkway	City/State/Zip	Kansas City, MO 64114
Phone	314-302-4661	Email	alanstaett@burnsmcd.com
Project Name / Testing Address	GFC / 4300 Goodfellow Blvd		
PO Number	168765	Collected By	

Turn-Around Time: X 5 DAY ☐ 3 DAY ☐ 2 DAY ☐ 1 DAY ☐ SAME DAY OR WEEKEND - Must Call Ahead

Client Sample ID	Collection Date & Time	Pb TCLP	TCLP RCRA 8	RCRA 8 Total	Toxic Metal Profile	Welding Fume Profile	TX 11 TCLP	CA 17 Total	Other Metals	Total Nuisance Dust	Respirable Dust	TSP Gravimetric	TSP Pb	PM-10	AIR: Total Time (Mins)	AIR: Flow Rate (L/min)	AIR: Vol (Total Liters)	WIPES: AREA (Give Travel or Measurement Size) in. or ft.
105L-W-01	6/5 1039								Ag, As, Ba, Cd, Cr, Pb, Se									6 × 24"
105L-W-02	1043								|									12 × 12
105L-W-03	1047								|									12 × 12
105L-W-04	1052								|									12 × 12
105L-W-05	1058								|									11.5 × 13
105L-W-06	1023								|									NA × NA

Released By: A. Anstaett Date: 6/7/24 Time: 1400

Signature: [redacted]

LAB USE ONLY – BELOW THIS LINE

Received By: JSadler

Signature: [redacted]

Date: 6/11/24 Time: 4 43 ☐ AM ☑ PM

☐ Portal Contact Added

7469 WHITEPINE RD, RICHMOND, VA 23237 (800)-347-4010

RESULTS VIA CLIENT PORTAL AVAILABLE @ www.leadlab.com

24-06-01638

Due Date:
06/18/2024
(Tuesday)
EL MM-L