

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 106 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 106 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. 106 was conducted on June 7, 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



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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. 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 2 of the 3 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	<0.5	<0.5	62
Arsenic	<2.5	<2.5	62
Barium	1.2	1.4	3,094
Cadmium	<0.1	<0.1	31
Chromium (Total)	<1.0	<1.0	3,094
Lead	1.3	3.6	10 ^(d)
Selenium	<2.5	<2.5	1,236

(a) Samples with a "<" sign indicate that the results were below the laboratory's reporting limit.

(b) $\mu g/sq$. 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] x 929cm²/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 2 samples that had detectable levels of one or more analytes, none of them exceeded the clean area limit.

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,

(6)

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 <u>r6environmental@gsa.gov</u>.

APPENDIX A – SAMPLE SUMMARY TABLE

Appendix A Sample Summary Table

Sample Number	Location	Area Description	Analyte	1	Result	Units	Clean Area Limit*
106-W-01	North entrance	Floor	Arsenic	<	2.5	μg/ft ²	62
			Barium		1.4	$\mu g/ft^2$	3,094
			Cadmium	<	0.10	μg/ft ²	31
			Chromium	<	1.0	μg/ft ²	3,094
			Lead		3.6	μg/ft ²	10
			Selenium	<	2.5	μg/ft ²	
			Silver	<	0.50	μg/ft ²	62
106-W-02	West wall	Top of desk	Arsenic	<	2.5	μg/ft ²	62
			Barium		1.2	μg/ft ²	3,094
			Cadmium	<	0.10	μg/ft ²	31
			Chromium	<	1.0	μg/ft ²	
			Lead		1.3	μg/ft ²	10
			Selenium	<	2.5	μg/ft ²	1,236
			Silver	<	0.50	$\mu g/ft^2$	62
106-W-03	Field Blank	Floor in front of desk with coffee pot	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 (μ g/m³) x 10 m³/100cm²] x 929cm²/sq. ft.] / 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

APPENDIX B – LABORATORY ANALYSIS REPORT



Wipe Metals Analysis Report

Client:	Burns & McDonnell Engineering 9400 Ward Pkwy.	Report Number:	24-06-01635
	Kansas City, MÓ 64114	Received Date:	06/11/2024
		Analyzed Date:	06/14/2024
Project/Te	st Address: 168765: CEC: 4300 Goodfellow Blud	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/ft ²)	Narrative ID
24-06-01635-001	106-W-01	Arsenic (As)	1.00	<2.50	<2.5	L01
		Barium (Ba)	1.00	1.36	1.4	L01
		Cadmium (Cd)	1.00	<0.100	<0.10	L01
		Chromium (Cr)	1.00	<1.00	<1.0	L01
		Lead (Pb)	1.00	3.63	3.6	L01
		Selenium (Se)	1.00	<2.50	<2.5	L01
		Silver (Ag)	1.00	<0.500	<0.50	L01
24-06-01635-002	106-W-02	Arsenic (As)	1.00	<2.50	<2.5	
		Barium (Ba)	1.00	1.16	1.2	
		Cadmium (Cd)	1.00	<0.100	<0.10	
		Chromium (Cr)	1.00	<1.00	<1.0	

Environmental Hazards Services, L.L.C

Client Number:26-3514Project/Test Address:168765; GFC; 4300 Goodfellow Blvd

Report Number: 24-06-01635

Lab Sample Number	Client Sample Number	Analyte:	Wipe Area (ft²)	Total Metal (ug)	Concentration (ug/ft ²)	Narrative ID
		Lead (Pb)	1.00	1.32	1.3	
		Selenium (Se)	1.00	<2.50	<2.5	
		Silver (Ag)	1.00	<0.500	<0.50	
24-06-01635-003	106-W-03	Arsenic (As)		<2.50		
		Barium (Ba)		<0.500		
		Cadmium (Cd)		<0.100		
		Chromium (Cr)		<1.00		
		Lead (Pb)		<0.500		
		Selenium (Se)		<2.50		
		Silver (Ag)		<0.500		

Environmental Hazards Services, L.L.C

Client Number:26-3514Project/Test Address:168765; GFC; 4300 Goodfellow Blvd

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

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:

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		

of acceptance limits.

Report Number: 24-06-01635

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