



Missouri Department of dnr.mo.gov

**NATURAL RESOURCES**

Eric R. Greitens, Governor

Carol S. Comer, Director

September 14, 2017

Mr. Brad Nies  
Program Manager  
Building Services Branch  
General Services Administration  
2300 Main Street, 7<sup>th</sup> Floor  
Kansas City, Missouri 64108-2416

**RE: Environmental Investigations, Goodfellow Federal Complex, 4300 Goodfellow Boulevard, St. Louis Missouri**

Dear Mr. Nies:

During the June 7, 2017 Kickoff Meeting Kevin Phillips requested the Department of Natural Resources (Department) review historical environmental documents for the Goodfellow Federal Complex (GFFC) located in St. Louis. The purpose of the review was to evaluate the environmental work that has been completed and recommend a path forward to complete a remedial investigation (RI) that meets the requirements of the Environmental Protection Agency's guidance document *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, Interim Final, OSWER Directive 9355.3-01*.

The Department reviewed all the documents provided and the 2008 *Combined Preliminary Assessment/Site Inspection Report (PA/SI)* and the ~~2010~~ *Remedial Investigation Report Final* provide the most information on the environmental condition of the GFFC. The 2008 *Combined Preliminary Assessment/Site Inspection Report PA/SI* found sufficient evidence of releases to the environment to warrant conducting a remedial investigation (RI). Despite the title, the ~~2010~~ *Remedial Investigation Report Final* does not meet the requirements of EPA's RI guidance but the report does provide some additional data on contamination at the GFFC.

The purpose of the RI report was to characterize occupational risks associated with former ordnance plant operations but the data was screened against residential standards in only a few instances. Before a RI work plan is initiated a thorough evaluation of the historic manufacturing processes and associated support activities and GSA tenant activities should be completed to develop a list of areas of concern (AOCs), potential contaminants of concern (PCOCs) and the media to be sampled. Sampling

Actual Remedial Investigation Report date is 2016, not 2010 as referenced within. GSA made correction May 2019.

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efforts should focus more on soil, water and concrete cores for PCBs. Sufficient wipe samples have been collected. Although the temporary wells did not identify significant groundwater contamination, permanent monitoring wells should be installed and quarterly sampling should be conducted to thoroughly evaluate the groundwater.

The Department suggests the General Services Administration (GSA) secure the services of an environmental firm with experience in completing a remedial investigation/feasibility study (RI/FS) in accordance with the Environmental Protection Agency's *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, Interim Final, OSWER Directive 9355.3-01*. With the sampling data GSA has collected, a review of historical operations documents and tenant activities an environmental firm could develop RI/FS work plan to complete a RI/FS for the Goodfellow Federal Complex. The Department is available to discuss the RI/FS process and work with GSA in developing a RI/FS work plan.

If you have questions or concerns, please contact me at the Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176, or by phone at (573) 522-1892.

Sincerely,

HAZARDOUS WASTE PROGRAM

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Jim Harris  
Environmental Specialist  
Federal Facilities Section

JH:rl