



Office of Audits  
Office of Inspector General  
U.S. General Services Administration

# Audit of Environmental Issues at the Goodfellow Federal Complex in St. Louis, Missouri

Report Number A170027/P/6/R19002  
March 15, 2019

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## ***Executive Summary***

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### **Audit of Environmental Issues at the Goodfellow Federal Complex in St. Louis, Missouri**

Report Number A170027/P/6/R19002

March 15, 2019

#### **Why We Performed This Audit**

In July 2016, the Department of Labor's Occupational Safety and Health Administration (OSHA) issued a notice to the GSA Public Buildings Service (PBS) of unsafe working conditions for the Goodfellow Federal Complex, located at 4300 Goodfellow Boulevard, St. Louis, Missouri (Goodfellow complex). The notice had seven serious citations, including the presence of hazardous contamination. PBS has since completed the required steps to address the citations included in OSHA's July 2016 notice. In light of the serious nature of the citations, we conducted this audit to evaluate PBS's response to environmental issues identified at the Goodfellow complex prior to the OSHA notice.

Our objectives were 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 environmental hazards accorded with applicable laws, regulations, and policies.

#### **What We Found**

PBS did not take adequate action to protect tenants, contractors, and visitors from hazards at the Goodfellow complex due to ineffective environmental management programs, policies, and guidance. During the period January 1, 2002, through December 31, 2016, Heartland Region PBS contracted for at least 33 studies costing in excess of \$1.9 million relating to environmental sampling and analysis at the Goodfellow complex. Most of these studies provided results that indicated various hazards were present at the complex and in many cases the results were duplicative of previous studies. Although these studies identified the presence of numerous environmental hazards at the complex, including lead, asbestos, and other known cancer-causing agents, PBS failed to comprehensively address the deficiencies and the complex's occupants of the existing conditions.

PBS's approach of conducting duplicative studies instead of taking action to remediate the hazardous contamination or prevent access to contaminated areas endangered the health of people at the complex and wasted taxpayer money. Furthermore, the deficiencies in PBS's approach to these studies and violations resulted from its lack of effective environmental programs and policies to ensure compliance with environmental regulatory requirements at both the regional and national levels.

## What We Recommend

We recommend 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.

We recommend that the PBS Regional Commissioner, Heartland Region, 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.

In its response to our report, PBS agreed with our recommendations and provided certain technical comments. We made minor adjustments to the report based on the information provided by PBS; however, those revisions did not affect our finding and conclusion. PBS's response can be found in its entirety in **Appendix C**.

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## ***Introduction***

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We performed an audit of the environmental issues at the Goodfellow Federal Complex in St. Louis, Missouri (Goodfellow complex). In 2016, the Department of Labor's Occupational Safety and Health Administration (OSHA) issued a notice of unsafe working conditions for the Goodfellow complex to the GSA Public Buildings Service (PBS). We examined environmental studies performed at the Goodfellow complex and PBS's response to those studies leading up to that notice.

### **Purpose**

We performed this audit in response to a PBS safety specialist's concern that people at the Goodfellow complex were exposed to hazardous conditions.

### **Objectives**

Our objectives were 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 environmental hazards accorded with applicable laws, regulations, and policies.

See **Appendix A** – Scope and Methodology for additional details.

### **Background**

The Goodfellow complex is situated on a 62.5 acre, 23 building campus in St. Louis, Missouri. The complex is comprised of buildings that were constructed in 1941 by the Department of Defense and were used as an Army Small Arms Munitions Plant to support the World War II effort. On July 1, 1966, ownership and operation of the complex was transferred from the Army to GSA. GSA subsequently converted the buildings to office space that currently house about 2,000 employees from nine different agencies, primarily the Department of Agriculture and the Veterans Benefits Administration.

The Goodfellow complex was added to the Environmental Protection Agency's (EPA) Federal Facility Hazardous Waste Compliance Docket in 1988. The docket identifies facilities that are managing or have managed hazardous waste, or have had a release of hazardous waste. From August 1981 to January 2011, PBS in the Heartland Region produced or was provided with over 100 documents regarding past environmental work at the Goodfellow complex.<sup>1</sup> These documents provide a detailed history of hazardous contamination at the complex.

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<sup>1</sup> GSA's Heartland Region includes the states of Iowa, Kansas, Missouri, and Nebraska.

Between 2011 and July 2016, PBS continued to conduct studies of the environmental conditions at the complex. One such study, completed in December 2010, identified serious contamination throughout the complex. In October 2014, A PBS Regional Safety Specialist requested documentation related to contamination at the Goodfellow complex from a PBS regional management official, but the official never provided any of the relevant studies. The PBS Safety Specialist found the December 2010 study on a Heartland Region shared drive in September 2015—nearly 5 years after it was issued. PBS subsequently initiated a review of other past studies that had similar findings and took some corrective actions. These actions included placing warning signs at the entrances to contaminated basements and providing copies of environmental studies to maintenance and janitorial contractors at the complex. However, these steps were not comprehensive.

In January 2016, a GSA employee filed a complaint with OSHA about the working conditions at the Goodfellow complex. The complaint prompted an investigation by OSHA that focused on environmental hazards that could affect worker safety. In July 2016, OSHA issued a notice of unsafe working conditions at the Goodfellow complex. The notice included seven violations, including:

- Staff and visitors were uninformed about their exposure to toxic substances;
- Lead dust was found in work areas; and
- Employer did not provide information to employees on the presence of hazardous chemicals and lead-containing dust.

After receiving the OSHA notification, PBS took corrective action to address the citations. These actions included informing tenants of the hazards, limiting access to some spaces, installing warning signs, and establishing a public electronic reading room for the various studies of the complex. According to OSHA, PBS satisfactorily completed all corrective actions to address the seven citations and closed its file on the complex in August 2018.

We examined environmental studies conducted at the Goodfellow complex between January 2002 and the July 2016 OSHA notice. PBS could not produce a complete listing of the studies performed at the Goodfellow complex and did not have a central repository for maintaining these studies. Accordingly, we developed a list of these studies, which is included in **Appendix B**. Six of the studies on our list were not provided by PBS but were obtained from the contractors that performed them. PBS was also unable to provide cost information for 15 of the studies. Based on the available information, we determined that between January 2002 and July 2016, PBS contracted for at least 33 studies of environmental hazards at the Goodfellow complex at a cost of at least \$1.9 million.

### Previous Audit Reports

Our office has previously reported on serious concerns over the management of PBS's environmental program. For example, in November 2010, we issued a report entitled, *Review of*

*Health and Safety Conditions at the Bannister Federal Complex, Kansas City, Missouri.*<sup>2</sup> This report noted:

PBS did not always take appropriate steps to protect the health and safety of the occupants at the Complex when presented with evidence of potential hazards. In addition, PBS environmental personnel provided incorrect and misleading information in response to questions about the environmental conditions at the Complex. PBS personnel also did not have a clear understanding of environmental responsibilities pertaining to the GSA-controlled portion of the Complex and did not adequately document or maintain files related to health and safety conditions at the Complex.

In response to the 2010 report findings, PBS stated that it was “currently organizing and cataloging all historical tests conducted within GSA-managed space.” In addition, PBS agreed with the audit recommendations and stated it was developing an action plan that outlines clear responsibilities within the safety and environmental group. However, during the course of our audit of the Goodfellow complex, we found continued deficiencies in the manner in which PBS documented and maintained information related to the environmental hazards at the complex. For example, as noted previously, a PBS regional management official did not provide a June 2013 study that detailed environmental hazards throughout the complex to a PBS Regional Safety Specialist. The environmental staff found this study in 2015, but PBS did not fully address the hazards identified in the study until after OSHA began its investigation in 2016.

In March 2015 we issued a report on PBS’s environmental risk management practices, which identified deficiencies in PBS’s policies and procedures.<sup>3</sup> Among other things, we reported that PBS did not have formal policy in place governing the conduct and use of environmental compliance audits, and environmental management practices were inconsistently implemented across PBS regional offices due to a lack of policy. These deficiencies prevented PBS from effectively monitoring and overseeing environmental risks across its portfolio of buildings. In response to our report, PBS stated that it would update its national policies to provide guidance on environmental risks. To date, the primary policy is still in draft form.

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<sup>2</sup> Report Number A100116/P/6/R11001, November 8, 2010.

<sup>3</sup> *PBS’s Identification and Management of Environmental Risks Need Improvement* (Report Number A130131/P/R/R15003, March 20, 2015).

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## Results

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PBS did not take appropriate action to protect tenants, contractors, and visitors from hazards at the Goodfellow complex because of poor environmental management programs, policies, and guidance. During the period January 1, 2002, through December 31, 2016, Heartland Region PBS contracted for at least 33 studies costing in excess of \$1.9 million regarding the environmental conditions at the Goodfellow complex. In many cases, the results of the studies were duplicative of previous studies. Although these studies identified the presence of numerous environmental hazards at the complex, including lead, asbestos, and other known cancer-causing agents; PBS failed to comprehensively address the deficiencies and inform the complex's occupants of the existing conditions.

PBS's inadequate response to the environmental hazards at the Goodfellow complex may have endangered the health of people at the complex and wasted taxpayer money. Furthermore, the deficiencies in PBS's approach to these studies and violations resulted from its lack of effective environmental programs and policies to ensure compliance with environmental regulatory requirements at both the regional and national levels.

**Finding – PBS failed to take appropriate measures to protect workers, tenants, contractors, and visitors from environmental contamination at the Goodfellow complex due to ineffective environmental programs, policies, and guidance.**

PBS has been aware of significant environmental contamination at the Goodfellow complex for decades. However, PBS has not taken all appropriate corrective actions to protect people at the complex from exposure to the contamination through site remediation, implementation of appropriate safety measures, and public disclosure of hazards. As a result, workers, contractors, and visitors to the complex were unable to make informed decisions about how to protect themselves from exposure to health hazards.

The Occupational Safety and Health Act of 1970 requires federal agencies to comply with applicable occupational health and safety standards. Those standards require, among other things, employers provide a place of employment that is free of recognized hazards. In addition, GSA policy requires that management address unsafe or unhealthful working conditions within 30 calendar days.<sup>4</sup> As discussed below, PBS did not comply with these requirements for contamination identified at the Goodfellow complex.

### Inadequate Response to Environmental Studies

PBS took some measures to remediate known environmental contamination at the Goodfellow complex, such as removal of asbestos-containing materials in some of the buildings. However,

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<sup>4</sup> 5940.1A ADM P (Revalidated) GSA Occupational Safety and Health Program.



PBS's response was not comprehensive and did not conform to the prescribed timeframe for addressing those hazards established under GSA policy. Instead of taking appropriate action to remediate or protect workers from exposure to contaminants found in areas of the complex, PBS typically had the same areas retested with subsequent studies. Specifically, between January 2002 and July 2016, we determined that PBS spent more than \$1.9 million on at least 33 studies. Many of these studies produced the same or similar results.<sup>5</sup>

For example, the complex's cafeteria (formerly a lead shop) was identified as a recognized environmental hazard in a study conducted in January 2002. Nonetheless, PBS awarded contracts for further studies in and around the cafeteria that resulted in similar findings. A November 2003 study identified lead and polychlorinated biphenyls (PCBs) that exceeded acceptable levels around and under the cafeteria. Additionally, a study conducted in August 2008 identified elevated levels of lead in, around, and under the cafeteria. Finally, a separate study was conducted in June 2013, which found excessive levels of PCBs and lead under the cafeteria. PBS took no action to inform tenants or implement safety controls for contaminated areas at the time these studies were issued.

Duplicative studies were also conducted at other facilities at the complex. For instance, an August 2008 study documented the presence of lead materials in buildings 103D, 105F, and 110. Environmental studies of the buildings conducted in March 2009 and June 2013 identified concentrations of lead that exceeded acceptable levels.<sup>6,7</sup> Similarly, tests of the complex's former childcare center conducted in November 2003, March 2006, and August 2008 identified the presence of lead paint and excessive lead levels throughout the center.<sup>8</sup> Emails from Heartland Region PBS officials showed that PBS planned a project to remediate the lead paint in the childcare center. However, current Heartland Region PBS officials were unable to provide support to show that this project was completed. These officials were also unaware of any attempts to notify parents of the children using the childcare center of the lead-related risks.

In addition to these studies, PBS contracted for a study issued in December 2010, which presented the results of prior environmental studies of the complex and reiterated that the environmental hazards identified in those reports remained problematic. Heartland Region PBS officials were unable to provide documentation showing whether any actions were taken in response to this study.

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<sup>5</sup> See **Appendix B**. As noted in the *Background* section of this report, PBS was unable to provide a complete list of all studies conducted at the Goodfellow complex during this time period.

<sup>6</sup> *Surface Lead Assessment Follow Up For Selected Areas At The Federal Center 4300 Goodfellow (GSA, March 11-12, 2009)*.

<sup>7</sup> *Occupational Exposure Evaluation Report, Rev. 00 General Services Administration Goodfellow Federal Complex St. Louis, Missouri (Tetra Tech. Inc., June 2013)*.

<sup>8</sup> The childcare center was closed in 2009.

As shown in the examples above, Heartland Region PBS did not address the environmental contamination identified through numerous studies as required. In accordance with GSA policy, PBS should have remediated the environmental hazards within 30 calendar days of identifying contamination, rather than conducting duplicative studies at the Goodfellow complex.

### **Inadequate Notification of and Response to Known Hazardous Contamination**

PBS failed to follow two OSHA requirements related to the contamination at the Goodfellow complex. First, PBS did not inform workers of potential hazards as required. Specifically, in July 2016, OSHA notified GSA of unsafe working conditions at the Goodfellow complex. OSHA reported that GSA failed to comply with, among other things:

- 29 CFR 1910.1200(h)(2)(ii): The employer did not provide information to the employees on operations in their work area where hazardous chemicals were present.
- 29 CFR 1910.1200(h)(2)(iii): The employer did not provide information to the employees as to the location and availability of the written hazard communication program, and material safety data sheets required by 29 CFR 1910.1200.

As a result, Goodfellow complex tenants, contractors, and visitors were unaware that the complex was contaminated with hazardous substances.

Second, PBS did not adhere to OSHA regulations requiring employers to warn employees of potential hazards. For example, although basements and crawlspaces of buildings at the complex were found to contain arsenic, lead, and asbestos, PBS left these areas unsecured and did not install signs warning of the presence of these contaminants until late 2015. Despite these unsafe working conditions, PBS allowed staff and contractors to perform regular maintenance and inspections in the contaminated areas. PBS's inaction prevented building occupants from taking the appropriate steps to protect themselves against the possibilities of harm resulting from their exposure or close proximity to the contaminants present at the complex.

### **PBS Violations Resulted from Ineffective Environmental Programs and Policies**

We found that PBS environmental staff failed to adhere to applicable OSHA requirements because PBS does not have effective programs or policies to ensure compliance. For instance, we identified weaknesses in PBS's Occupational Safety and Health Program. The mission of this program is to support and facilitate GSA's mission by protecting its human resources, property, and financial assets, and by ensuring that all programs comply with regulatory requirements.<sup>9</sup> This program assigns the responsibility for developing and implementing a regional occupational safety and health program to the PBS regional administrators. While the national

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<sup>9</sup> 5940.1A ADM P (Revalidated) GSA Occupational Safety and Health Program.

program offers guidance on the duties of regional PBS staff, it does not provide effective oversight of regional compliance with occupational health and safety standards through evaluations or other means. It also does not provide guidance to the regional offices on how to address tenant safety or findings of commissioned studies.

We also noted that PBS has not implemented policies or procedures that detail actions required when commissioning safety studies for PBS properties. National PBS officials were unable to provide policies that establish clear roles and responsibilities for addressing study results, making study results public, or maintaining the universe of studies performed. This lack of policies coupled with ineffective program oversight of occupational health and safety compliance created an environment in which Heartland Region PBS staff did not take appropriate and timely action to address hazardous contamination at the Goodfellow complex. Instead, Heartland Region PBS awarded unnecessary and costly additional studies that often resulted in duplicative results.

Heartland Region PBS personnel were unable to provide written guidance on how staff is to address the findings arising from studies that identify potential contamination. Furthermore, PBS's national occupational safety and health policy does not include guidance on how to respond when these studies identify hazardous contamination.

Federal internal control standards require that agencies establish control activities to comply with applicable laws and regulations and respond to risks.<sup>10</sup> Accordingly, Heartland Region PBS management should implement controls to ensure timely and appropriate corrective action is taken to address health, safety, and environmental studies.

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<sup>10</sup> *Standards for Internal Control in the Federal Government*, September 2014.

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## **Conclusion**

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Since 2010, our office has reported on deficiencies in PBS's environmental risk management at the regional and national levels. Our audit of PBS's actions in response to environmental hazards at the Goodfellow complex demonstrates that our longstanding concerns remain unresolved. Although PBS was aware of the presence of numerous environmental hazards at the Goodfellow complex, including lead, asbestos, and other known cancer-causing agents, it did not take appropriate action to protect tenants, contractors, and visitors from hazards. This occurred due to ineffective environmental programs, policies, and guidance. As a result, PBS wasted taxpayer dollars and endangered the health of people at the complex.

In response to OSHA's July 2016 findings, PBS took positive actions to protect people by informing the tenants of the hazards, limiting access to some spaces, installing warning signs, and establishing a public website listing the various studies conducted at the complex. However, PBS could improve on these steps by establishing policy requiring transparency for all of its buildings and establishing controls to ensure that corrective action is taken for all studies performed at PBS properties.

## **Recommendations**

We recommend 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.

We recommend that the PBS Regional Commissioner, Heartland Region, 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.

### **GSA Comments**

In its response to our report, PBS agreed with our recommendations and provided certain technical comments. We made minor adjustments to the report based on the information provided by PBS; however, those revisions did not affect our finding and conclusion. PBS's response can be found in its entirety in **Appendix C**.

### **Audit Team**

This audit was managed out of the Heartland Region Audit Office and conducted by the individuals listed below:

Michelle Westrup	Acting Regional Inspector General for Auditing
Michael Capper	Audit Manager
Daniel Riggs	Auditor-In-Charge

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## ***Appendix A – Scope and Methodology***

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We initiated our audit on November 2, 2016, to assess environmental issues at the Goodfellow complex, located in St. Louis, Missouri.

To accomplish our objectives, we:

- Attempted to identify and evaluate the entire universe of Goodfellow complex environmental studies and associated costs of the studies;
- Summarized environmental issues identified in past studies of the Goodfellow complex;
- Discussed historical GSA communication of environmental study results for the Goodfellow complex over time;
- Reviewed workplace safety experts' reports to identify environmental issues that have not been addressed;
- Reviewed prior audit reports and news articles related to Heartland Region hazardous contamination;
- Interviewed PBS officials and tenant agency officials; and
- Reviewed and analyzed environmental management laws, regulations, policies, and guidance from PBS, OSHA, and the EPA.

We conducted the audit between April 2017 and June 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

### **Internal Controls**

Our assessment of internal controls was limited to those necessary to address the objectives of the audit.

## Appendix B – Goodfellow Environmental Studies

### Goodfellow Federal Complex Studies Performed Between January 2002 through July 2016

Date	Contractor	Cost	Results	PBS Action Prior to OSHA's July 2016 Notice
January 2002	Marc Enviro Services LLC	*PBS unable to provide*	Lead contamination may exist around the cafeteria and lead testing recommended around the childcare center.	PBS commissioned additional studies.
March 2003	SCS Engineers	\$100,000	Soil remediated of lead in the former firing range in Building 105.	No action documented.
November 2003	SCS Engineers	\$182,000	Metals, including arsenic, lead, mercury, copper, and silver detected at concentrations above acceptable levels. Polychlorinated biphenyls identified in the basement of the cafeteria. Lead found in paint at the childcare center. Elevated concentrations of mercury found in Building 104.	Additional soil samples were taken.
November 2003	Erio Consulting	*PBS unable to provide*	Paint remediation recommended for the childcare center.	PBS ordered additional testing of the peeling paint.
June 2004	SCS Engineers	\$95,000	Beryllium detected in soil and mercury detected in Buildings 103, 103D, and 103E.	Additional samples were taken.
December 2004	SCS Engineers	Included in June 2004 Report	In Buildings 104K and 104L, beryllium exceeded acceptable standards in all soil samples analyzed. Mercury was detected in wipe samples.	No action documented.
December 2004	SCS Engineers	Included in June 2004 Report	Aroclor 1260 concentrations exceeded acceptable standards in Building 108A. Recommend additional monitoring.	Additional samples were taken.
March 2006	SCS Engineers	Included in June 2004 Report	Lead was detected above acceptable limits in Building 104E (childcare center). Mercury concentrations exceeded	No action documented.

## Appendix B – Goodfellow Environmental Studies

### Goodfellow Federal Complex Studies Performed Between January 2002 through July 2016

Date	Contractor	Cost	Results	PBS Action Prior to OSHA's July 2016 Notice
			acceptable standards near former Building 104L.	
March 2006	SCS Engineers	Included in June 2004 Report	No additional concerns noted.	Additional samples were taken.
November 2006	SCS Engineers	*PBS unable to provide*	No additional concerns noted.	No additional action needed.
August 2007	Midwest Asbestos Abatement	*PBS unable to provide*	Documented the removal of asbestos material from Building 104.	No action documented.
May 2008	OCCU-TEC	*PBS unable to provide*	Detected asbestos and lead-based paint in the cafeteria building.	No action documented.
July 2008	OCCU-TEC	*PBS unable to provide*	No concerns were noted.	No action needed.
August 2008	SCS Engineers	\$67,800	Lead detected in Buildings 102, 102D, 102E, 103, 103D, 103E, 103F, 104, 104F, 105, 105E, 105F, 110, 115, and the utility tunnel complex. Samples collected from occupied areas of the childcare center, cafeteria, Building 105, and Building 110 contained lead in excess of the applicable standard.	Internal plans to address the report appear to have been made but no documentation was presented to show any action was taken.
August 2008	SCS Engineers	\$15,909	Lead concentration in unoccupied areas was above the acceptable level.	No action documented.
February 2009	OCCU-TEC	\$5,705	Lead detected above acceptable standards.	No action documented.
March 2009	GSA	Internal - No Cost Provided	Lead detected in concentrations above the standards in Buildings 103D, 105F, and 110.	No action documented.
June 2010	Bureau Veritas	*PBS unable to provide*	Detected asbestos in floor tiles in the childcare center.	No action documented.
December 2010	Terracon	*PBS unable to provide*	This report reviewed prior environmental reports and reiterated most of the previously noted	No action documented.



## Appendix B – Goodfellow Environmental Studies

### Goodfellow Federal Complex Studies Performed Between January 2002 through July 2016

Date	Contractor	Cost	Results	PBS Action Prior to OSHA's July 2016 Notice
			hazards.	
November 2011	OCCU-TEC	\$166,685	Update the asbestos management program to include the completed abatement action. Continued implementation of the building's asbestos management program.	No action documented.
January 2012	Terracon	\$496,448	Documented the removal of asbestos material from Building 122B.	No action needed.
February 2012	OCCU-TEC	\$18,285	Confirmed asbestos containing materials and lead paint in Building 141C.	No action documented.
September 2012	Tetra Tech	\$68,014	Identified a multitude of contaminates throughout the complex.	No action documented.
October 2012	OCCU-TEC	*PBS unable to provide*	Update the building asbestos management program to include the completed abatement action. Continued implementation of the building's asbestos management program.	No action documented.
November 2012	Terracon	\$355,437	Documented the removal of asbestos material from Building 107.	No action needed.
December 2012	EnviroTech	*PBS unable to provide*	Documented the removal of asbestos and lead material from Building 107.	No action needed.
December 2012	OCCU-TEC	*PBS unable to provide*	Tested for airborne asbestos in Building 102D and none was detected.	No action needed.
June 2013	Tetra Tech Inc.	\$274,563	Polynuclear aromatic hydrocarbons detected in crawlspace and basement in Buildings 103, 103A, 103B, 103C, and the former childcare center. Polychlorinated biphenyls detected in Buildings 104, 104A, 104B, 104C, 104D,	In 2015, additional mercury testing took place. Subsequent safety surveys were conducted.

## Appendix B – Goodfellow Environmental Studies

### Goodfellow Federal Complex Studies Performed Between January 2002 through July 2016

Date	Contractor	Cost	Results	PBS Action Prior to OSHA's July 2016 Notice
			105, 105A, 105B, 105C, 105D, 107, 110, and the cafeteria. Lead detected in Buildings 103, 103A, 103B, 103C, 103D, 103E, 104, 104A, 104B, 104C, 104D, 105F, 110, and 115 and in the basement and crawlspaces of Buildings 103, 103A, 103B, 103C, 103 E, 104F, and the former childcare center. Arsenic detected in crawlspace of Buildings 105A, 105B, 105C, and 105D. Asbestos inspection and management plans missing for Buildings 103E, 104F, and the former childcare center. Asbestos detected in the basement and crawlspace of Buildings 103E, 104F, and the former childcare center.	
November 2015	Assay Technology	*PBS unable to provide*	Tested for mercury vapor in the crawlspaces and tunnels. No mercury vapor was detected above acceptable levels.	No action needed.
March 2016	OCCU-TEC	\$122,259	Lead samples in Buildings 102E, 103, 103F, 104, 104F, 105, 105E, 105F, 106, 110, 115, and 122B, and the former childcare center were above GSA target levels.	PBS began informing tenant agencies in spring 2016 about the hazardous contamination at the Goodfellow complex. They also granted public access to the relevant studies and require site specific safety plans.
April 2016	AquaComp	*PBS unable to provide*	Water test for Building 107, no hazardous analyte detected above EPA limits.	No action needed.
May 2016	AquaComp	*PBS unable to provide*	Water test for Building 110, no hazardous	No action needed.

## Appendix B – Goodfellow Environmental Studies

### Goodfellow Federal Complex Studies Performed Between January 2002 through July 2016

Date	Contractor	Cost	Results	PBS Action Prior to OSHA's July 2016 Notice
			analyte detected above EPA limits.	
July 2016	Global Environmental, Inc.	*PBS unable to provide*	Building 104 tested over the reporting limit for several analytes, including lead and barium.	No action documented.
	<b>Total Costs</b>	<b>\$1,968,105<sup>11</sup></b>		

<sup>11</sup> PBS was unable to provide the cost of 15 of the 33 reports we documented here. We anticipate the actual cost to taxpayers was significantly higher than \$1.97 million shown. In addition, the total cost presented here does not include the cost of government resources incurred related to these studies.

## Appendix C – GSA Comments

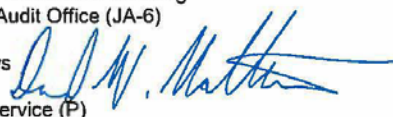


General Services Administration

February 28, 2019

To: John Walsh  
Regional Inspector General for Auditing  
Heartland Region Audit Office (JA-6)

From: Daniel W. Mathews  
Commissioner  
Public Buildings Service (P)



Robert Stafford  
Chief Administrative Services Officer  
Office of Administrative Services (H)

SUBJECT: Audit of Environmental Issues at 4300 Goodfellow in St. Louis,  
Missouri (A170027)

Thank you for the opportunity to review the January 17, 2019, draft of the above-referenced audit. The Public Buildings Service (PBS) offers the following response and requests that it be incorporated into the final report. PBS also is providing technical comments for consideration by the Office of Inspector General (OIG).

The OIG 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.

PBS agrees with the recommendation.

2. Finalize updates to the GSA Occupational Safety and Health Program Order to ensure transparency and adherence to Occupational Safety and Health Administration [OSHA] requirements regarding environmental contamination in PBS facilities.

The GSA Office of Administrative Services, which is responsible for the Order in this recommendation, concurs with that recommendation, and is currently updating the order in preparation for issuance.

The OIG recommended that the PBS Regional Commissioner, Heartland Region, 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.

PBS agrees with this recommendation. PBS implemented controls on May 1, 2016, that prevent individuals from entering certain areas within the Goodfellow Federal Center. In addition, PBS developed a site-specific safety plan (SSSP) for individuals who work at and/or visit the Federal Center. PBS trained employees in the requirements of the SSSP. PBS educated tenant agency leadership (March 1, 2016) on the issues at the Federal Center, and requires each agency to have an SSSP for its employees. PBS requires all contractors working at the Federal Center to submit an SSSP for review and concurrence before commencing any work at the site. Signage

1800 F Street, NW  
Washington, DC 20405-0002  
[www.gsa.gov](http://www.gsa.gov)

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## Appendix C – GSA Comments

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and safety information is posted on site as appropriate. Additionally, PBS has an industrial hygienist on site to monitor SSSP activity.

2. PBS has a complete and publicly accessible repository for all environmental studies conducted on all of its properties in the Heartland Region.

PBS agrees with this recommendation, while noting that sharing of some studies may be limited for technical, security, or legal reasons. Reports will be shared in accordance with 29 CFR 1960, Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters, and CPL 02-00-124, the OSHA Multi-employer Citation Policy.

On March 1, 2016, PBS established an online reading room that includes all known environmental studies for the Federal Center. On May 1, 2016, PBS began providing periodic email messages to communicate status updates on environmental issues to tenant agency representatives. The email updates include a link to the online reading room.

In addition to the Federal Center, PBS has two other sites in the Heartland Region that face similar issues. The environmental records regarding these sites are maintained in the following area public libraries: Kansas City Public Library Northeast Branch, 6000 Wilson Ave, Kansas City, MO, 64123, for the Federal Center and the site at 607 Hardesty Avenue, Kansas City, MO, 64124; and the Mid-Continent Public Library, Blue Ridge Branch, 9253 Blue Ridge Boulevard, Kansas City, MO, 64138, for the Federal Center and the site at 1500 East Bannister Road, Kansas City, MO, 64131.

3. All health, safety, and environmental studies are distributed upon completion to the occupants of any Heartland Region property where studies are performed.

PBS agrees with this recommendation, while noting that sharing of reports and studies may be limited for technical, security, or legal reasons. Reports will be shared in accordance with 29 CFR 1960, Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters, and CPL 02-00-124, the OSHA Multi-employer Citation Policy.

4. Corrective action is taken and publicly disclosed in response to all health, safety, and environmental studies performed within the Heartland Region.

PBS agrees with this recommendation.

Surveys, studies, tests and all respective findings are maintained in accordance with all national PBS program requirements. The PBS Heartland Region has a study tracking process to ensure that study recommendations receive appropriate action. In addition, the PBS Heartland Region has an electronic storage plan for maintaining studies and reports. These plans are available on the PBS network business process site (<https://sites.google.com/a/gsa.gov/r6-fmd-bizprocess/>).

PBS also is providing the following technical comments.

**B. Page 5: "Environmental studies of the buildings conducted in March 2009 and June 2013 identified concentrations of lead that exceeded acceptable levels."**

As the report references only the month and year of each study, PBS requests the OIG confirm whether the following studies are referenced, and include these references in the report and the associated information in the draft report.

If the June 2013 study is the *Rev. 00 General Services Administration Goodfellow Federal Complex (Tetra Tech, Inc. 6/2013)*, then PBS concurs that lead levels exceeded environmental cleanup standards and actions are, and have been, ongoing to address contamination at the complex.

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## Appendix C – GSA Comments

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If the March 2009 study refers to *Surface Lead Assessment Follow Up For Selected Areas At The Federal Center 4300 Goodfellow (GSA, 3/11-12/2009)*, it should be noted there are no Department of Labor-OSHA regulatory workplace limits for surface lead now or at that time. Page A-1 of the report states: "There are no clearly established standards for acceptable surface lead concentrations in workplaces." PBS chose to *consider* a value recommended by OSHA to be an acceptable workplace limit, but there was no Federal requirement to do so.

**C. Page 7: "Furthermore, PBS's national occupational safety and health policy does not include guidance on how to respond when these studies identify hazardous contamination."**

PBS agrees with the importance of guidance, particularly for initiating responses to hazardous contamination. Applicable safety and health standards provide guidance by setting contamination limits for response (e.g., permissible exposure limits, action levels, environmental remediation limits). Please note, though, that the response for elevated contamination limits is unique to each particular circumstance (nature, level, and extent of contamination, as well as the population at risk from contamination, are among some of the issues considered), and therefore cannot be adequately captured in a policy or guidance document.

Thank you for the opportunity to comment on this draft report. Should you have any questions, please contact Andrew Heller, PBS Assistant Commissioner for Facilities Management, at 202-501-0772.

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## ***Appendix D – Report Distribution***

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GSA Administrator (A)

GSA Deputy Administrator (AD)

Commissioner (P)

Deputy Commissioner (P)

Chief of Staff (P)

Regional Administrator (6A)

Regional Commissioner for PBS (6P)

Regional Council (LD6)

Director of Financial Management (BG)

Chief Administrative Services Officer (H)

Audit Management Division (H1EB)

Assistant Inspector General for Auditing (JA)

Director, Audit Planning, Policy, and Operations Staff (JAO)