



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

IMPLEMENTATION REVIEW OF CORRECTIVE ACTION PLAN

**Audit of Environmental Issues at
the Goodfellow Federal Complex
in St. Louis, Missouri
Report Number
A170027/P/6/R19002
March 15, 2019**

Assignment Number A201001
July 24, 2020

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Introduction

We have completed an implementation review of the management actions taken in response to the recommendations contained in our March 2019 audit report, *Audit of Environmental Issues at the Goodfellow Federal Complex in St. Louis, Missouri*, Report Number A170027/P/6/R19002.

Objective

The objective of our review was to determine whether GSA has taken the actions as outlined in the corrective action plan for *Audit of Environmental Issues at the Goodfellow Federal Complex in St. Louis, Missouri* (see **Appendix A**).¹ To accomplish our objective we:

- Examined documentation submitted by GSA to support completion of the corrective action plan steps;
- Performed limited testing of GSA's implementation of the processes and procedures contained in these supporting documents; and
- Interviewed PBS officials responsible for implementing the regional corrective actions.

Background

The Goodfellow Federal Complex, located in St. Louis, Missouri (Goodfellow complex), is comprised of 23 buildings that were constructed in 1941 by the Department of Defense and were used as an Army Small Arms Munitions Plant. In 1966, ownership and operation of the complex was transferred from the Army to GSA. GSA converted the buildings to office space that, at the time of our original report issuance, housed about 2,000 employees from nine different agencies.

In July 2016, the Department of Labor's Occupational Safety and Health Administration (OSHA) issued a notice to PBS of unsafe working conditions for the Goodfellow complex. The notice had seven serious citations, including the presence of hazardous contamination. According to OSHA, PBS satisfactorily completed all corrective actions to address the seven citations; OSHA closed its file on the complex in August 2018.

On March 15, 2019, we issued an audit report, *Audit of Environmental Issues at the Goodfellow Federal Complex in St. Louis, Missouri*, to PBS. The objectives of the audit 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.

¹ In its response to the audit report, PBS designated that it would be responsible for five recommendations, and the Office of Administrative Services would be responsible for one recommendation.

Our audit found that 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.

To address the finding identified in our report, we 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.

In addition, we 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.
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 agreed with our report recommendations.

Results

Our implementation review determined that the PBS Regional Commissioner, Heartland Region, did not fully and effectively implement a corrective action to institute a process for communicating the results of all environmental studies to ensure all affected parties will receive the information.

Finding – The PBS Heartland Region’s communication process does not ensure all occupants are notified of the results of all environmental studies upon completion.

Our original audit found that PBS failed to follow two OSHA requirements related to known contamination at the Goodfellow complex:

- 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, we reported that Goodfellow complex tenants, contractors, and visitors were unaware that the complex was contaminated with hazardous substances. We recommended that the PBS Heartland Region institute controls to ensure that all health, safety, and environmental studies are distributed upon completion to the occupants of any Heartland Region property where the studies are performed.²

In accordance with its corrective action plan to address our audit finding and recommendation, the PBS Heartland Region instituted a process for communicating the results of all environmental studies to ensure all affected parties will receive the information. However, as described below, the PBS Heartland Region did not fully and effectively implement this corrective action because its communication process does not ensure that all occupants are notified of the results of all environmental studies upon completion.

PBS Heartland Region’s Communication Process Is Not Comprehensive

In accordance with its corrective action plan, the PBS Heartland Region issued the *Region 6 Environmental Studies/Reports Process* on October 9, 2019.³ The PBS Heartland Region subsequently issued a revised version of this process on March 6, 2020.

² This recommendation was listed as Recommendation 3 in our audit report; GSA’s corrective action plan lists it as Recommendation 5.

³ The Heartland Region is also known as Region 6.

PBS's revised process states, "Most environmental studies and reports for Region 6 are related to exterior soil and groundwater investigations Results of these studies are typically not disclosed to or provided to building tenants as they are exterior and most often do not impact tenant occupied areas." According to PBS Heartland Region officials, this process meets "PBS National Office expectations, which is to provide environmental studies to affected occupants."

While PBS states that tenant-occupied areas are generally not affected by contamination in the soil and groundwater, tenants should nonetheless be made aware of the contamination. Doing so would be consistent with PBS's approach of notifying building occupants of hazards identified in building basements. PBS notifies tenants of contamination found in these unoccupied areas because there is a risk that the contaminants can affect tenants under certain circumstances. Similarly, soil and groundwater contamination may pose a health risk to occupants under certain conditions, such as migration of soil or groundwater contaminants into buildings through vapor intrusion.

PBS's notification process places clear limits on which occupants of Heartland Region properties are notified of the results of environmental studies. Under PBS's process, the risk remains that these occupants would not have information on all hazardous contamination necessary to make decisions about how to protect themselves from the risk of exposure. Therefore, PBS's corrective action is ineffective because it does not ensure that all affected parties will receive the results of all safety, health, and environmental studies.

PBS Heartland Region Did Not Communicate Environmental Study Results Upon Completion

In our testing, we asked PBS management to provide recent safety, health, and environmental studies so we could verify that PBS followed its process to notify tenants of environmental findings. In our review of these documents, we found an annual occupational safety survey, which identified hazards related to asbestos, lead, and air quality/carbon monoxide at the Goodfellow complex. The results of this survey were reported to the PBS St. Louis West Field Office on September 23, 2019. However, PBS Field Office officials did not notify Goodfellow complex tenants of the results until 5 months later on February 28, 2020.

Our recommendation stated that PBS should ensure all studies are distributed *upon completion* to Heartland Region occupants. Further, PBS's delayed notification violated 41 CFR 102-80.10, which states that "Federal agencies must: (a) Provide for a safe and healthful work environment for Federal employees and the visiting public ... and (g) Act promptly and appropriately in response to risk."

In conclusion, the PBS Heartland Region did not fully and effectively implement its corrective action to institute a process for communicating the results of all environmental studies to all building occupants upon completion. Accordingly, PBS must submit revised corrective actions to address this finding.

Conclusion

Our implementation review determined that the PBS Heartland Region did not fully and effectively implement a corrective action for one recommendation.

As a result, a revised corrective action plan addressing the corrective action associated with this open recommendation must be submitted by August 24, 2020, to this office and the Audit Management Division (H1EB).

Audit Team

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

Michelle Westrup
Erin Kraft
Daniel Riggs

Regional Inspector General for Auditing
Auditor-In-Charge
Auditor

Appendix A – Corrective Action Plan for Report Number A170027/P/6/R19002

A170027 PBS, Office of Facilities Management

Designated Responding Official: [REDACTED]

Contact Person: [REDACTED]

Telephone Number: [REDACTED]

Date: 3/22/2019

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|-----------------------------------------------------------------------------------------------------------------------------|------------------------------------|--------------------------------------------------------------|
| Audit report number- A170027– Audit of Environmental Issues at the Goodfellow Federal Complex in St. Louis, Missouri | Recommendation Number 0 0 1 | Proposed Recommendation Completion Date: October 2019 |
|-----------------------------------------------------------------------------------------------------------------------------|------------------------------------|--------------------------------------------------------------|

Recommendation

We recommend that the PBS Commissioner: 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.

| <u>Action to be Taken Step by Step</u> | <u>Supporting Documentation to be sent to the GSA IG Office.</u> | <u>Documentation Will be Sent Last Day</u> |
|------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|--------------------------------------------|
| 001 Issue PBS Safety & Health Management Policy and Desk Guide | Final signed directive | 6/31/2019 |
| 002 Conduct PBS employee training on the PBS Safety & Health Management Policy and Desk Guide | Training slides, dates conducted and attendee lists | 10/31/2019 |
| 003 Ensure PBS offices received the updated GSA Order 5940.2 | Copy of email promulgating the order to the appropriate PBS offices | 5/31/2019 |
| 004 Complete national PBS A123 health and safety review for OSHA compliance | Report of A123 key controls review for compliance including action needed to strengthen compliance | 10/31/2019 |

A170027 GSA, Office of Administrative Services

Designated Responding Official: [REDACTED]

Contact Person: [REDACTED]

Telephone Number: [REDACTED]

Date: 3/22/2019

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|----------------------------------------------------------------------------------------------------------------------------------|------------------------------------|----------------------------------------------------------|
| Audit report number- i.e. A170027– Audit of Environmental Issues at the Goodfellow Federal Complex in St. Louis, Missouri | Recommendation Number 0 0 2 | Proposed Recommendation Completion Date: May 2019 |
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Recommendation

We recommend that the PBS Commissioner: 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.

| <u>Action to be Taken Step by Step</u> | <u>Supporting Documentation to be sent to the GSA IG Office</u> | <u>Documentation Will be Sent Last Day</u> |
|------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|--------------------------------------------|
| 001 Issue updated General Services Administration Occupational Safety and Health Program Policy Directive | GSA Order ADM 5940.2 | 5/31/2019 |
| 002 Distribute the updated policy to all regions. | Email with Directive and instruction sent to appropriate GSA offices | 5/31/2019 |

A170027 PBS, Heartland Region (06)

Designated Responding Official: [REDACTED]
 Contact Person: [REDACTED]
 Telephone Number: [REDACTED]
 Date: 3/22/2019

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| Audit report number- A170027– Audit of Environmental Issues at the Goodfellow Federal Complex in St. Louis, Missouri | Recommendation Number 0 0 3 | Proposed Recommendation Completion Date: May 2019 |
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Recommendation

We recommend that the PBS Regional Commissioner, Heartland Region, institute controls to ensure that 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.

| <u>Action to be Taken Step by Step</u> | <u>Supporting Documentation to be sent to the GSA IG Office</u> | <u>Documentation Will be Sent Last Day</u> |
|------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|---------------------------------------------------|
| 001 Develop a site specific safety plan (SSSP) for all GSA employees who access controlled spaces and track adherence to the plan | The printed site specific safety plan | 5/31/2019 |
| 002 Require all contractors and tenants conducting work in controlled spaces to submit an SSSP for GSA review/concurrence. | The spreadsheet used to track the SSSP sheets submitted | 5/31/2019 |
| 003 Contract for service to monitor compliance of contractor SSSPs. | The printed tracking log | 5/31/2019 |
| 004 Implement regular tenant communication for updates | A copy of the email communication template. | 5/31/2019 |

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| Audit report number- A170027– Audit of Environmental Issues at the Goodfellow Federal Complex in St. Louis, Missouri | Recommendation Number 0 0 4 | Proposed Recommendation Completion Date: October 2019 |
|-----------------------------------------------------------------------------------------------------------------------------|------------------------------------|--------------------------------------------------------------|

Recommendation

We recommend that the PBS Regional Commissioner, Heartland Region, institute controls to ensure that: PBS has a complete and publicly accessible repository for all environmental studies conducted on any and all of its properties in the Heartland Region.

| <u>Action to be Taken Step by Step</u> | <u>Supporting Documentation to be sent to the GSA IG Office</u> | <u>Documentation Will be Sent Last Day</u> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|---------------------------------------------------|
| 001 The regional PBS program manager will maintain publicly accessible sites for GSA properties where it is required by environmental regulation. | URL and snapshot of online site content | 5/31/2019 |
| 002 Develop a file plan to organize and store environmental studies. | The written file plan | 10/31/2019 |
| 003 Organize known studies using the file plan referenced in Action 002. | Screen shot of the populated file plan. | 10/31/2019 |

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| Audit report number- A170027– Audit of Environmental Issues at the Goodfellow Federal Complex in St. Louis, Missouri | Recommendation Number 0 0 5 | Proposed Recommendation Completion Date: October 2019 |
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Recommendation

We recommend that the PBS Regional Commissioner, Heartland Region, institute controls to ensure that: All health, safety, and environmental studies are distributed upon completion to the occupants of any Heartland Region property where studies are performed.

| <u>Action to be Taken Step by Step</u> | <u>Supporting Documentation to be sent to the GAO/IG Audit Management Division</u> | <u>Documentation Will be Sent Last Day</u> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|---------------------------------------------------|
| 001 Maintain publicly accessible sites for GSA properties where it is required by environmental regulation. | URL and snapshot of online site content | 5/31/2019 |
| 002 Institute a process for communicating the results of all environmental studies to ensure all affected parties will receive the information. | Written environmental studies communication process. | 10/31/2019 |

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| Audit report number- A170027– Audit of Environmental Issues at the Goodfellow Federal Complex in St. Louis, Missouri | Recommendation Number 0 0 6 | Proposed Recommendation Completion Date: October 2019 |
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Recommendation

We recommend that the PBS Regional Commissioner, Heartland Region, institute controls to ensure that: Corrective action is taken and publicly disclosed in response to all health, safety, and environmental studies performed within the Heartland Region.

| <u>Action to be Taken Step by Step</u> | <u>Supporting Documentation to be sent to the GAO/IG Audit Management Division</u> | <u>Documentation Will be Sent Last Day</u> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|---------------------------------------------------|
| 001 Institute a process for tracking all health, safety, and environmental studies action items | Written tracking process | 5/31/2019 |
| 002 Institute a process for ensuring corrective action for all health, safety and environmental studies items are completed and publicly disclosed | Written process for management controls of action items. | 10/31/2019 |

Appendix B – Report Distribution

GSA Administrator (A)

GSA Deputy Administrator (AD)

Commissioner (P)

Deputy Commissioner (PD)

Chief of Staff (PB)

Deputy Chief of Staff (PB)

Regional Administrator (6A)

Regional Commissioner for PBS (6P)

Regional Counsel (LD6)

Director of Financial Management (BG)

Chief Administrative Services Officer (H)

Chief of Staff (H)

Audit Management Division (H1EB)

Assistant Inspector General for Auditing (JA)

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