



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

IMPLEMENTATION REVIEW OF CORRECTIVE ACTION PLAN

**Audit of PBS National Capital  
Region's Asbestos Management  
in Building 40 of the St.  
Elizabeths West Campus  
Report Number  
A230046/P/R/R24003  
May 1, 2024**

Assignment Number A260035  
May 15, 2026

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## ***Table of Contents***

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<b><i>Introduction .....</i></b>	<b><i>1</i></b>
<b><i>Results .....</i></b>	<b><i>3</i></b>
<b><i>Appendix A – Corrective Action Plan for Report Number A230046/P/R/R24003 .....</i></b>	<b><i>4</i></b>
<b><i>Appendix B – Report Distribution .....</i></b>	<b><i>10</i></b>

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## Introduction

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We have completed an implementation review of the management actions taken in response to the recommendations contained in our May 2024 audit report, *Audit of PBS National Capital Region's Asbestos Management in Building 40 of the St. Elizabeths West Campus*, Report Number A230046/P/R/R24003.

### Objective

The objective of our review was to determine whether Public Buildings Service (PBS) has taken the actions as outlined in the corrective action plan for *Audit of PBS National Capital Region's Asbestos Management in Building 40 of the St. Elizabeths West Campus* (see **Appendix A**). To accomplish our objective we:

- Reviewed the original audit report to understand the recommendations and provide context to the corrective action plan;
- Met and corresponded with PBS management;
- Examined documentation submitted by PBS personnel to support completion of the corrective action plan steps; and
- Performed limited testing of PBS's implementation of the guidance and procedures contained in the submitted documentation.

### Background

Building 40 is a 6,615-square-foot building located on the St. Elizabeths West Campus in Washington, D.C. It is a two-story brick building that has four rooms on each above-grade floor and a single finished room in the basement. A May 2007 hazardous material inspection report for Building 40 listed the presence of asbestos-containing materials (ACMs) in floor tiles, pipe insulation, and ceiling tile adhesive.<sup>1</sup>

In October 2022, we received a hotline complaint alleging that PBS National Capital Region (NCR) staff were possibly exposed to asbestos in Building 40 of the St. Elizabeths West Campus.<sup>2</sup> The complaint identified potential health concerns caused by the possibility that the staff suffered prolonged exposure to asbestos in Building 40, noting that some former employees who worked in the building have experienced significant medical issues, including cancer.

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<sup>1</sup> When ACMs are disturbed, tiny asbestos fibers that are too small to see are released into the air. Workers and others who breathe asbestos fibers over a span of many years are at a higher risk of developing asbestos-related diseases.

<sup>2</sup> On September 18, 2025, GSA issued GSA Order ADM 5440.760, *Changes in the Public Buildings Service*. Under the order, PBS reorganized from a regional structure to a centralized organization. This eliminated PBS's 11 regional offices. Because our original audit was completed prior to the reorganization, we retained references to PBS's NCR in this implementation review report.

On May 1, 2024, we issued an audit report, *Audit of PBS National Capital Region's Asbestos Management in Building 40 of the St. Elizabeths West Campus* to PBS NCR. The objective of the audit was to determine if PBS NCR is managing asbestos in Building 40 of the St. Elizabeths West Campus in accordance with federal regulations and PBS policy to ensure the health and safety of individuals.

Our audit found that PBS NCR mismanaged asbestos in Building 40. Specifically, we found that PBS NCR:

- Did not maintain comprehensive and reliable asbestos records for Building 40, which hindered its ability to effectively manage asbestos in the building;
- Did not take appropriate measures to eliminate or mitigate ACM hazards in Building 40, placing building occupants, visitors, and contractors at risk of asbestos exposure; and
- Failed to notify building occupants of the presence and location of asbestos in Building 40 in violation of an Occupational Safety and Health Administration standard and PBS asbestos management policy.

To address the findings identified in our report, we recommended that the PBS NCR Regional Commissioner:

1. Conduct a comprehensive assessment of PBS NCR's asbestos management program and implement internal controls to ensure adherence to federal regulations and PBS asbestos management policy.
2. Comprehensively train PBS NCR management and staff so that they have a clear understanding of PBS's asbestos management policy and their roles and responsibilities for effectively and safely managing ACM in GSA-owned facilities.
3. Take the actions listed below to improve asbestos management in Building 40:
  - a. Develop and maintain an accurate, current, and comprehensive ACM inventory.
  - b. Upon completion of the ACM inventory, assess hazards arising from the ACM in the building and implement appropriate actions to mitigate or eliminate those hazards.
  - c. Ensure all required asbestos records are maintained in the Inventory Reporting Information System.
  - d. Enforce the asbestos management requirements established in the Building 40 operations and maintenance contract.
  - e. Update, enforce, and administer the Building 40 asbestos management plan.
  - f. Notify tenants of ACM inventory annually.

The PBS NCR Regional Commissioner agreed with our report recommendations.

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## ***Results***

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Our implementation review determined that PBS NCR has taken appropriate corrective actions to address the recommendations. We determined that no further action is necessary.

## Appendix A – Corrective Action Plan for Report Number A230046/P/R/R24003

### Public Building Service (PBS) National Capital Region (NCR), Corrective Action Plan

**Designated Responding Official:** Melanie F. Gilbert, Regional

**Commissioner Public Buildings Service**

**Contact Person:** Everett Smallwood (WPM1CA)

**Telephone Number:** 202-401-0714

**Date:** August 21, 2024

A230046PRR24003; Audit of PBS National Capital Region's Asbestos Management in Building 40 of the St. Elizabeths West Campus	Recommendation number	Completed
	001	

**Finding(s):**

**Finding 1:** "PBS NCR did not maintain comprehensive and reliable asbestos records for Building 40, which hindered its ability to effectively manage asbestos in the building."

**Root Cause of Finding(s):**

PBS NCR did not properly store Building 40 asbestos records and did not have a centralized method for tracking periodic surveillance.

**Recommendation:**

Conduct a comprehensive assessment of PBS NCR's asbestos management program and implement internal controls to ensure adherence to federal regulations and PBS asbestos management policy.

<u>Action to be Taken Step by Step</u>	<u>Supporting Documentation to be sent to the OCFO BA or BG office</u>	<u>Documentation will be sent Last Duty Day of the month</u>
001 NCR Office of Facility Management	001 June 5, 2023 Asbestos Management	001 Completed

*Version Date: 3/01/2023*

<p>(OFM) issued all employees an asbestos management directive explaining the requirements of the GSA Asbestos Policy 1000.1A.</p> <p><b>002</b> NCR Industrial Hygienist audited and ensured proper record storage for all the activities noted in the June 5, 2023 directive to include annual periodic surveillance, annual tenant notifications, pre-alteration assessments, and GSA asbestos awareness training.</p> <p><b>003</b> PBS NCR implemented a regimented annual periodic surveillance inspection process for all properties presumed to contain asbestos (pre-1998 construction).</p> <p><b>004</b> PBS NCR will issue annual tenant notifications for the presence of asbestos to all PBS NCR properties known to contain ACM.</p>	<p>Directive</p> <p><b>002</b> 2023 Annual periodic surveillance IRIS FMA templates</p> <p>2023 annual tenant notifications</p> <p>GSA asbestos awareness certificates</p> <p><b>003</b> 2023 annual periodic surveillance IRIS FMA templates and/or reports.</p> <p><b>004</b> 2023/2024 annual tenant notifications</p> <p><b>005</b> IRIS FMA asbestos module files</p>	<p><b>002</b> Completed</p> <p><b>003</b> Completed</p> <p><b>004</b> Completed</p> <p><b>005</b> Completed</p>
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<p><b>005</b> PBS NCR will internally assess the Inventory Reporting Information System Facilities Management Assessment Module and ensure all asbestos documents, to include periodic surveillance reports and tenant notifications, are uploaded for each building. All annual requirements will be tracked by a regional IH to ensure compliance.</p> <p><b>006</b> PBS NCR will update and maintain an accurate and comprehensive ACM Inventory of Building 40.</p>	<p><b>006</b> Mabbett February 14, 2024 Building 40 Asbestos Pipe and Elbow Review.</p> <p>May 2007 Global Consulting Hazardous Materials Survey.</p> <p>June 2016 Mabbett O&amp;M Asbestos Inspection Report.</p> <p>October 2021 Rambin Global O&amp;M Asbestos Inspection Report.</p> <p>August 2023 EMCOR Periodic Surveillance.</p>	<p><b>006</b> Completed</p>
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	<p>February 2024 EMCOR Annual Visual Inspection.</p> <p>November 2023 Tenant Notification</p> <p>February 2024 Updated Asbestos Management Plan.</p>	
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**Public Building Service (PBS) National Capital Region (NCR), Corrective Action Plan**

**Designated Responding Official:** Melanie F. Gilbert, Regional

**Commissioner Public Buildings Service**

**Contact Person:** Contact Person: Everett Smallwood (WPM1CA)

**Telephone Number:** 202-401-0714

**Date:** August 21, 2024

A230046PRR24003; Audit of PBS National Capital Region's Asbestos Management in Building 40 of the St. Elizabeths West Campus	<b>Recommendation number</b>  002	<b>Completed</b>
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**Finding(s):**

**Finding 2:** PBS NCR did not take appropriate measures to eliminate or mitigate asbestos containing material hazards in Building 40, placing building occupants, visitors, and contractors at risk of asbestos exposure.

**Root Cause of Finding(s):**

PBS NCR did not have adequate internal controls to ensure annual periodic surveillance was conducted, to ensure pre-alteration assessments were completed prior to any renovations or construction projects, or to ensure all asbestos records were properly stored in the PBS system of record.

**Recommendation:**

PBS NCR should comprehensively train PBS NCR management and staff so that they have a clear understanding of PBS's asbestos management policy and their roles and responsibilities for effectively and safely managing ACM in GSA-owned facilities.

<b><u>Action to be Taken Step by Step</u></b>	<b><u>Supporting Documentation to be sent to the OCFO BA or BG office</u></b>	<b><u>Documentation will be sent Last Duty Day of the month</u></b>
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<b>001</b> NCR Office of Facility Management (OFM) issued all employees an asbestos management directive explaining the requirements of the GSA Asbestos Policy 1000.1A.	<b>001</b> June 5, 2023 Asbestos Management Directive	<b>001</b> Completed
<b>002</b> PBS NCR will make the GSA Asbestos Awareness training mandatory for all OFM employees.	<b>002</b> GSA Asbestos Awareness training certificates	<b>002</b> Completed

**Public Building Service (PBS) National Capital Region (NCR), Corrective Action Plan**

**Designated Responding Official:** Melanie F. Gilbert, Regional  
Commissioner Public Buildings Service

**Contact Person:** Contact Person: Everett Smallwood (WPM1CA)

**Telephone Number:** 202-401-0714

**Date:** August 21, 2024

A230046PRR24003; Audit of PBS National Capital Region's Asbestos Management in Building 40 of the St. Elizabeths West Campus	<b>Recommendation number</b>  003	<b>Completed</b>
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**Finding(s):**

**Finding 3:** "PBS NCR failed to notify building occupants of the presence and location of asbestos in Building 40 in violation of an Occupational Safety and Health Administration standard and PBS asbestos management policy."

**Root Cause of Finding(s):**

**PBS NCR did not have adequate internal controls to ensure annual tenant notifications occurred for Building 40 occupants.**

**Recommendation:**

**PBS NCR Regional Commissioner should ensure the following actions are taken to improve asbestos management in Building 40:**

- A. Develop and maintain an accurate, current, and comprehensive ACM inventory.
- B. Upon completion of the ACM inventory, assess hazards arising from the ACM in the building and implement appropriate actions to mitigate or eliminate those hazards.
- C. Ensure all required asbestos records are maintained in the Inventory Reporting Information System.
- D. Enforce the asbestos management requirements established in the Building 40 operations and maintenance contract.
- E. Update, enforce, and administer the Building 40 asbestos management plan.
- F. Notify tenants of ACM inventory annually.

<b><u>Action to be Taken Step by Step</u></b>	<b><u>Supporting Documentation to be sent to the OCFO BA or BG office</u></b>	<b><u>Documentation will be sent Last Duty Day of the month</u></b>
<b>001</b> PBS NCR will update and maintain an accurate and comprehensive ACM Inventory of Building 40.	<p><b>001</b> Mabbett February 14, 2024 Building 40 Asbestos Pipe and Elbow Review.</p> <p>May 2007 Global Consulting Hazardous Materials Survey.</p> <p>June 2016 Mabbett O&amp;M Asbestos Inspection Report.</p> <p>October 2021 Rambin Global O&amp;M Asbestos Inspection Report.</p> <p>August 2023 EMCOR Periodic Surveillance.</p> <p>February 2024 EMCOR Annual Visual Inspection.</p> <p>November 2023 Tenant Notification</p>	<b>001</b> Completed

<p><b>002</b> PBS NCR will create a new Asbestos Management Plan that will be updated with each new asbestos event and/or periodic surveillance. The Plan will be made accessible to those needing access to the facility's asbestos information, including contractors. Ongoing annual asbestos surveillance is used to document and verify the condition of the existing asbestos containing materials. If deterioration is noted access to the space will be stopped until abatement can be initiated.</p> <p><b>003</b> PBS NCR will enforce the contract requirement that the O&amp;M contractor conduct annual periodic surveillance of known asbestos in Building 40.</p>	<p>February 2024 Updated Asbestos Management Plan.</p> <p><b>002</b> DC1456SE - St. Elizabeths Building 40: Circulating Library - Asbestos Management Plan.</p> <p><b>003</b> August 2023 EMCOR Periodic Surveillance.</p> <p>February 2024 EMCOR Annual Visual Inspection.</p>	<p><b>002</b> Completed</p> <p><b>003</b> Completed</p>
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<p><b>004</b> PBS NCR will internally assess the IRIS FMA Asbestos Module and update and maintain the Building 40 asbestos files.</p> <p><b>005</b> NCR Building Management team and COR will ensure the Building 40 O&amp;M Contractor is aware of their asbestos management requirements and enforce the contract terms.</p> <p><b>006</b> PBS NCR will issue annual tenant notifications for the presence of asbestos in Building 40. Each tenant notification will be uploaded to the IRIS FMA Asbestos Module.</p>	<p><b>004</b> Building 40 IRIS FMA Asbestos Module asbestos files.</p> <p><b>005</b> August 2023 EMCOR Periodic Surveillance.</p> <p>February 2024 EMCOR Periodic Surveillance.</p> <p><b>006</b> November 21, 2023 Annual Asbestos Notification.</p>	<p><b>004</b> Completed</p> <p><b>005</b> Completed</p> <p><b>006</b> Completed</p>
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## ***Appendix B – Report Distribution***

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GSA Administrator (A)

GSA Deputy Administrator (AD)

PBS Acting Commissioner (P)

PBS Deputy Commissioner (P1)

Deputy Commissioner of Enterprise Strategy (P2)

Assistant Commissioner for Client Strategy (PC)

Acting Chief of Staff (PB)

Chief Financial Officer (B)

Deputy Chief Financial Officer (B)

Office of Audit Management and Accountability (BA)

Assistant Inspector General for Auditing (JA)

Deputy Assistant Inspector General for Acquisition Audits (JA)

Deputy Assistant Inspector General for Real Property Audits (JA)

Director (JAO)



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