

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

GSA Did Not Respond to Water Contamination at the Patrick V. McNamara Federal Building in a Timely Manner, Placing Building Occupants at Risk

Memorandum Number A240049 July 30, 2024



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

July 30, 2024

TO:	ELLIOT DOOMES COMMISSIONER PUBLIC BUILDINGS SERVICE (P)
FROM:	R. NICHOLAS GOCO ASSISTANT INSPECTOR GENERAL FOR AUDITING (JA)
SUBJECT:	GSA Did Not Respond to Water Contamination at the Patrick V. McNamara Federal Building in a Timely Manner, Placing Building Occupants at Risk Memorandum Number A240049

GSA's Public Buildings Service Great Lakes Region (PBS Region 5) did not respond to water contamination at the Patrick V. McNamara Federal Building (McNamara Federal Building) in a timely manner. As a result, building occupants were at risk of exposure to potentially harmful levels of lead, copper, and *Legionella* bacteria, and were not provided with critical information necessary to make informed decisions about their health and safety.

We found that PBS Region 5 did not respond in a timely manner for two reasons. First, PBS's water quality management policy did not convey a sense of urgency or include clear time frames for responding to water contamination. Second, PBS's building management personnel did not know how to respond to the water contamination, which caused delays in PBS Region 5's response.

#### Background

GSA owns over 1,600 federal buildings and leases space in over 6,700 buildings nationwide. As landlord for the federal government, GSA is responsible for operating and maintaining GSA-controlled (federally owned and leased) space in a safe and healthful manner.<sup>1</sup> In this capacity, GSA is faced with a range of health and safety risks affecting its buildings, including health and safety risks arising from water contamination.

<sup>&</sup>lt;sup>1</sup> 40 U.S.C. 582, Management of buildings by Administrator of General Services; and 41 C.F.R. 102, Federal Management Regulation.

The three main contaminants that cause concern related to water are lead, copper, and *Legionella* bacteria. These contaminants are described below:

- Lead According to the U.S. Environmental Protection Agency (EPA), lead can affect almost every organ and system in the human body. The EPA has established a lead action level of 15 parts per billion (ppb).<sup>2</sup> Because lead has no taste or smell, the EPA stresses the need for regular testing of drinking water to identify lead contamination.
- Copper Although an essential nutrient in very small amounts, excess copper can be dangerous. Copper exposure can cause vomiting, nausea, abdominal pain, and diarrhea. Exposure to high levels of copper can lead to severe illnesses, such as kidney and liver damage. The EPA has established an action level for copper of 1,300 ppb.<sup>3</sup> Regular testing is critical to ensure that the amount of copper present in drinking water does not exceed the EPA action level.
- Legionella Legionella bacteria is the primary cause of Legionnaires' disease, a potentially fatal illness involving pneumonia. Legionnaires' disease is the leading cause of reportable waterborne disease outbreaks in the United States, affecting between 52,000 and 70,000 people each year and often requiring hospitalization. People can get Legionnaires' disease if they breathe in water droplets containing Legionella bacteria or if contaminated water enters their lungs while drinking.

Although cases of Legionnaires' disease are generally mild in children, people 50 years or older, current or former smokers, and people with chronic disease or weakened immune systems are at increased risk for Legionnaires' disease. According to the Centers for Disease Control and Prevention (CDC), about 10 percent of the people who contract Legionnaires' disease will die.

Legionella bacteria can pose significant health risks when present in cooling towers, which are used in centralized cooling systems for buildings. Cooling towers contain water and fans to remove heat from the air. If the cooling towers are inadequately maintained, this process can create water droplets that contain Legionella bacteria, which can be inhaled by building occupants.

<sup>&</sup>lt;sup>2</sup> 40 C.F.R. 141.80(c)(2). In 1991, the EPA published a regulation (40 C.F.R. 141, Subpart I) to control lead and copper in drinking water. This regulation is known as the Lead and Copper Rule (also referred to as the LCR). The treatment technique for the rule requires water systems to monitor drinking water at customer taps. If lead concentrations exceed an action level of 15 ppb or copper concentrations exceed an action level of 1.3 ppm (1,300 ppb) in more than 10 percent of customer taps sampled, the system must undertake a number of additional actions to control corrosion.

<sup>&</sup>lt;sup>3</sup> 40 C.F.R. 141.80(c)(3). *See* footnote 2.

*Legionella* bacteria can also contaminate drinking water, particularly when the water is allowed to stagnate. According to the CDC, there is no safe level of *Legionella* bacteria in drinking water. The CDC classifies *Legionella* bacteria in drinking water as:

- Well controlled (less than 1 colony forming unit per milliliter [CFU/mL]);
- Poorly controlled (1 to 9.9 CFU/mL); and
- Uncontrolled (10 or more CFU/mL).

The CDC's guidance states that "If *Legionella* growth does not appear well controlled in healthcare facilities or facilities with populations at increased risk of Legionnaires' disease, consider implementing *immediate* control measures to protect people from exposure to water aerosols...."<sup>4</sup> (emphasis added)

#### **McNamara Federal Building**

The McNamara Federal Building is a 27-story-tall skyscraper that occupies an entire city block in downtown Detroit, Michigan. The building was constructed in 1972 and houses numerous federal tenant agencies, including the U.S. Army Corps of Engineers, Social Security Administration, and Federal Bureau of Investigation. *Figure 1* below includes a photograph of the building.



#### Figure 1 – Photograph of the McNamara Federal Building<sup>5</sup>

<sup>&</sup>lt;sup>4</sup> <u>Toolkit for Controlling Legionella in Common Sources of Exposure | CDC,</u> January 13, 2021.

<sup>&</sup>lt;sup>5</sup> Source: GSA website. Photograph. Detroit, Michigan. <u>https://www.gsa.gov/about-us/gsa-regions/region-5-great-lakes/buildings-and-facilities/michigan/detroit-mcnamara-fb</u>.

#### Prior GSA OIG Audit Products Related to Water Quality

Our office has previously issued two alert memorandums related to water quality in GSAcontrolled facilities. These memorandums are summarized below.

Alert Memorandum: *PBS Must Take Immediate Action to Address the Risk of Legionella Contamination in GSA-Controlled Buildings.*<sup>6</sup> On September 20, 2023, we issued an alert memorandum notifying GSA to take immediate action to address the risk of *Legionella* contamination across GSA-controlled buildings. Our memorandum was based on water testing results that detected elevated levels of *Legionella* bacteria in water at six GSA-controlled buildings located across four different GSA regions. The current reduced building occupancy levels can lead to water stagnation, which provides ideal conditions for the growth and spread of *Legionella* bacteria and increases the likelihood that other buildings may be contaminated.

Alert Memorandum: *PBS Did Not Test Water Prior to Reopening GSA Child Care Centers Closed During the COVID-19 Pandemic.*<sup>7</sup> We issued this memorandum on September 6, 2022, because PBS did not effectively test for water contamination prior to reopening GSA child care centers that were closed during the COVID-19 pandemic. Due to extended periods of limited or no occupancy, water in these facilities may have become stagnant, which presents a risk for elevated levels of hazardous contaminants like lead, copper, and *Legionella* bacteria. Without proper testing, PBS could not ensure that children or staff at the child care centers had access to safe drinking water.

#### Hotline Complaint Concerning the Drinking Water Supply at the McNamara Federal Building

In December 2023, we received a hotline complaint from a federal employee working at the McNamara Federal Building. This complaint arose after the PBS building management office informed tenants of drinking water contamination in the building on November 29, 2023. The complaint stated:

Of significant concern, there was over a week delay from when GSA knew about this issue to when they informed us. As a result, employees were still consuming the water during this delay. There is understandably an abundance of concern among employees who may have been or could be exposed to these toxins while continuing to work in the building. Additionally, there are restrooms accessible to the general public that have no signage with warnings; therefore, the general public could be exposed.

Based on our assessment of the hotline complaint, we concluded that the complaint had merit and are notifying PBS of the deficiencies identified through this memorandum.

<sup>&</sup>lt;sup>6</sup> Memorandum Number A230072-1.

<sup>&</sup>lt;sup>7</sup> Memorandum Number A201018-8.

# PBS Region 5 did not respond to water contamination at the McNamara Federal Building in a timely manner, placing building occupants at risk.

PBS Region 5 did not respond to water contamination at the McNamara Federal Building in a timely manner. As a result, building occupants faced increased health risks and were prevented from making informed decisions about their health and safety. The lack of a timely response also prompted some tenants to take their own response measures.

Overall, we found that PBS Region 5 did not respond in a timely manner for two reasons. First, PBS's water quality management policy does not convey a sense of urgency or include clear time frames for responding to water contamination. Second, PBS building management personnel did not know how to respond to water contamination, which caused delays in PBS Region 5's response.

## PBS Did Not Respond to Water Contamination at the McNamara Federal Building in a Timely Manner

GSA is responsible for operating and maintaining GSA-controlled space in a safe and healthful manner. Starting in August 2023, PBS Region 5 became aware of the presence of water contaminants at the McNamara Federal Building. When the water contamination was identified, PBS should have responded promptly to inform building occupants and address the water contamination. Among other things, PBS should have promptly notified building occupants of the contamination and taken actions, such as disinfecting cooling towers and closing off affected water fixtures, to prevent exposure to the contaminants.

However, as described below, PBS Region 5 did not respond to the water contamination at the McNamara Federal Building in a timely manner.

- Legionella Bacteria Detected in Cooling Tower In August 2023, the McNamara Federal Building operations and maintenance contractor performed laboratory tests that showed the presence of Legionella bacteria in the building's cooling towers. PBS Region 5 did not notify tenants of the positive test results until November 1, 2023.
- Drinking Water Contamination The finding of Legionella bacteria in the building's cooling tower, combined with drinking water contamination identified at the nearby Rosa Parks Federal Building, prompted PBS Region 5 to test the drinking water at the McNamara Federal Building.<sup>8</sup> On November 8, 2023, a contractor collected water from a sample of 121 fixtures located throughout the McNamara Federal Building. The water samples were subsequently sent to an accredited lab to be tested for the presence of contaminants.

<sup>&</sup>lt;sup>8</sup> The Rosa Parks Federal Building is located at 985 Michigan Avenue in Detroit, Michigan. On June 5, 2023, PBS notified building tenants that it was closing this building after receiving the results of a water quality test. In an email to tenants, GSA stated that recent tests indicated elevated levels of metal and bacteria in the drinking water.

The laboratory delivered the test results to PBS 13 days later, on November 21, 2023. However, PBS did not notify the building tenants of the test results or take any corrective actions to protect building occupants from exposure to the contaminants until 8 days later, on November 29, 2023.

As shown in *Figure 2* below, the test results showed that of the 121 fixtures tested, 27 (22 percent) exceeded EPA or CDC guidelines for one or more contaminants.

Test	Number of Fixtures that Tested Positive
Lead	2
Copper	8
Legionella	20

#### Figure 2 – Number of Fixtures that Tested Positive for Water Contaminants at the McNamara Federal Building<sup>9</sup>

**Note:** Some fixtures tested positive for more than one contaminant.

## PBS's Delayed Response Placed Building Occupants at Risk

PBS's delayed response to the water contamination at the McNamara Federal Building placed building occupants at risk of exposure to potentially harmful levels of lead, copper, and *Legionella* bacteria. It also prevented building occupants from making informed, timely decisions on their health and safety.

Further, PBS's delayed response led to multiple tenant agencies taking independent actions to ensure the health and safety of their employees and visitors. For example, some tenant agencies provided bottled water to employees and visitors. Another tenant agency purchased its own "do it yourself" test kits and tested the drinking water in the building for metals and *Legionella* bacteria. As shown in *Figure 3* on the next page, this tenant posted a notice directing building occupants not to drink the water and directed questions to the tenant agency—not to PBS building management. The tenant also posted the results of its own water testing.

<sup>&</sup>lt;sup>9</sup> See *Attachment 1* for the detailed list of fixtures with positive results of contaminants over the EPA or CDC guidelines.

## Figure 3 – Signs Posted by a Tenant Agency in Public Areas with Results of Its Non-GSA Water Testing<sup>10</sup>



The actions taken by GSA's tenant agencies demonstrate a lack of confidence in GSA's ability to manage the building and provide a healthy and safe work environment. While the tenants' actions are understandable, they could have led to conflicting guidance that could cause confusion and undermine GSA's ability to effectively manage the situation.

## Deficiencies in GSA's Water Quality Management Policy and Training of Its Building Personnel Led to the Lack of a Timely Response to the Water Contamination

Overall, we found deficiencies in GSA's water quality management policy and training of its building management personnel that led to the lack of a timely response to the water contamination at the McNamara Federal Building. GSA's water quality management policy consists of two GSA orders and a companion desk guide, none of which convey a sense of urgency or clearly define time frames for responding to water contamination in GSA-controlled facilities.

<sup>&</sup>lt;sup>10</sup> Photograph taken by audit team on January 17, 2024. We redacted the point of contact's name and email address because they display personally identifiable information.

GSA Order PBS 1000.7A, *Drinking Water Quality Management*, issued November 16, 2023, outlines new water testing procedures and the actions to take when fixtures test positive for contaminants. However, it does not convey a sense of urgency or clearly specify required time frames for notifying building occupants of, or remediating, water contamination.

The *Desk Guide for Drinking Water Quality Management*, a companion to GSA Order PBS 1000.7A issued by the PBS Office of Facilities Management's Facility Risk Management Division, states that GSA should:

- 1. Notify affected occupants per [GSA Order] PBS 2400.1, *Risk Management Notification*, of drinking water concerns that could impact their health.
- 2. Initiate appropriate corrective action to address and remediate the source of the problem.

The means and methods of notification may vary according to individual circumstance, such as differences in the established channels of communication, the level of urgency required for notification, and the number of Affected Occupants.

Additionally, GSA Order PBS 2400.1, issued January 8, 2021, defines timely notification as:

A duration sufficiently brief to reasonably avoid or prevent further personal injury, facility damage, or other adverse consequences beyond that which may have been associated with the EHSF [Environmental, Health, Safety and Fire Protection] Event. Timely Notification may also represent a specific time limit when identified by an applicable regulation, law, or code.

The PBS guidance shown above is flawed because it does not convey a sense of urgency or clearly define response time frames. For example, the Risk Management Notification Policy cites a "sufficiently brief" duration; however, this time frame is vague and open to interpretation. Further, it neither conveys a sense of urgency nor mirrors authoritative guidance, such as the CDC's guidance on *Legionella* bacteria, which urges building owners to take "immediate control measures." Immediate control measures should include both the closing of affected fixtures and timely notification.

In addition to ill-defined criteria for responding to water contamination, neither the building manager nor the assistant building manager for the McNamara Federal Building knew how to respond to the test results. For example, after the drinking water test results were received on November 21, 2023, the property managers sought guidance from the PBS regional office on how to handle the situation. Until the guidance was received, the building manager and assistant building manager did not take actions that could have protected building occupants from exposure to contaminated water, such as the immediate closure of affected fixtures.

These interim measures could have been quickly put into effect until more comprehensive actions could have been implemented, such as flushing the water system, installing filters, replacing faucets, and conducting additional tests as needed.

#### Conclusion

PBS did not respond to elevated levels of lead, copper, and *Legionella* bacteria at the McNamara Federal Building in a timely manner. As a result, building occupants were at risk of exposure to water contaminants and could not make informed health and safety decisions. Further, GSA's delayed response led some tenants to take their own response measures.

Overall, we found that PBS's lack of timely response to the water contamination at the McNamara Federal Building stemmed from vague guidance and inadequately trained building managers and operations personnel. PBS's guidance should convey a sense of urgency and establish specific time frames for notifying building occupants of water contamination. These time frames should be commensurate with the likelihood of exposure to water contaminants and potential severity of the associated health risks. In addition, PBS building management personnel should be thoroughly trained on the requirements for responding to water contamination, including the proper protocols for protecting and notifying building occupants.

#### **GSA Comments**

In written comments to our draft memorandum, the PBS Commissioner acknowledged that "a more timely notification to [McNamara Federal Building] occupants would have been appropriate as [PBS] determined what corrective action was required to reduce risk." The PBS Commissioner wrote that GSA takes the safety of its building occupants "very seriously" and added that "GSA is undertaking an extensive, national testing program at federally owned facilities and in leased space to proactively identify water quality concerns and take corrective action."

The PBS Commissioner also detailed a number of actions that GSA has taken or plans to take in an effort to improve water quality management. For example, the Commissioner wrote of GSA's plans to update GSA Order PBS 1000.7A, *Drinking Water Quality Management*, "to require notification of preliminary results within one business day and notification of final testing results within three business days." Additionally, the Commissioner noted that PBS's "recent hiring actions have focused on improving subject matter expertise in addressing water quality."

GSA's written comments are included in their entirety as Attachment 2.

#### **Compliance Statement**

This memorandum complies with the Council of Inspectors General on Integrity and Efficiency's Quality Standards for Federal Offices of Inspector General.

## Audit Team

This assignment was managed out of the Great Lakes Region Audit Office and conducted by the individuals listed below:

Michael Lamonica	Regional Inspector General for Auditing
Franklin Moy	Audit Manager
Robert Lange	Auditor-In-Charge

# Attachment 1 – Test Results of Fixtures with Positive Results of Contaminants

Floor	Fixture Type	Lead ppb (Note 1)	Copper ppb (Note 2)	<i>Legionella</i> CFU/mL (Note 3)
8	Drinking Fountain	21		14.8
Mezzanine	Drinking Fountain			12
8	Drinking Fountain		2,800	
13	Drinking Fountain			2.4
20	Drinking Fountain			2.4
5	Drinking Fountain			2
8	Drinking Fountain			1.2
Basement	Restroom Sink		1,600	30
21	Restroom Sink		4,500	17.2
20	Restroom Sink		1,500	
3	Restroom Sink			8
4	Restroom Sink			7.2
19	Restroom Sink			3.2
19	Restroom Sink			2.8
3	Restroom Sink			2.8
Basement	Restroom Sink			2
18	Restroom Sink			2
3	Restroom Sink			1.6
4	Restroom Sink			1.6
21	Restroom Sink			1.2
26	Restroom Sink			1.2
20	Kitchen Sink			3.6
17	Kitchen Sink		2,700	
26	Kitchen Sink		2,400	
4	Shower		5,500	
4	Shower		2,200	
Basement	Shower	26		

#### Notes:

- 1. EPA action level for lead is 15 ppb or higher.
- 2. EPA action level for copper is 1,300 ppb or higher.
- 3. CDC poorly controlled *Legionella* bacteria level is 1 to 9.9 CFU/mL; uncontrolled level is 10 CFU/mL.

## Attachment 2 – GSA Comments

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GSA	Public Buildings Service
June 27, 2024	
MEMORANDUM FOR:	R. NICHOLAS GOCO ASSISTANT INSPECTOR GENERAL FOR AUDITING (JA)
FROM:	ELLIOT DOOME!
SUBJECT:	Response to the GSA Office of Inspector General's Draft Memorandum, "GSA Did Not Respond to Water Contamination at the Patrick V. McNamara Federal Building in a Timely Manner, Placing Building Occupants at Risk," Memorandum Number A240049

The U.S. General Services Administration (GSA) has received your draft memorandum "GSA Did Not Respond to Water Contamination at the Patrick V. McNamara Federal Building in a Timely Manner, Placing Building Occupants at Risk," Memorandum Number A240049, dated June 11, 2024. GSA takes very seriously the safety of our building occupants including federal employees, contractors and visitors. For this reason, GSA is undertaking an extensive, national testing program at federally owned facilities and in leased space to proactively identify water quality concerns and take corrective action.

#### Background

#### Lead and Copper

Drinking water is regulated under the National Primary Drinking Water Regulations (NPDWR). These enforceable standards apply to Public Water Systems (PWS). As part of the NPDWR, Lead and copper are regulated under the 1991 Lead and Copper Rule (40 C.F.R. Part 141, Subpart I). There are two key requirements.

- If lead concentrations exceed an action level of 15 ppb or copper concentrations exceed an action level of 1.3 ppm in more than 10% of customer taps sampled, the PWS must undertake a number of additional actions to control corrosion.
- If the action level for lead is exceeded, the PWS must also inform the public about steps they should take to protect their health and the PWS may have to replace lead service lines under their control.

While the NPDWR are not directly applicable to GSA as it is not a PWS, GSA has voluntarily chosen to incorporate the action levels from the NPDWR into its drinking water quality

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management guidance and operates and maintains facilities to meet the intent of those regulations. As CDC notes, "Exceeding the action level alone is not a violation of the regulation. Public water systems are assigned a violation when they fail to perform actions required by the regulations. This happens after the action level is exceeded [EPA 2000b; EPA 2016b]."

In November 2023, GSA issued the Drinking Water Quality Management Policy (PBS 1000.7A) and associated guidance. Per the policy, GSA is voluntarily conducting water testing for lead and copper. Where exceedances of the action levels occur, the updated guidance requires prompt notification and corrective action, which is consistent with the intent of the NPDRW.

#### Legionella

Legionella is a naturally occurring bacteria, and similar to other naturally occurring substances, it can be harmful. GSA follows CDC guidance to control *Legionella* through operational and maintenance practices to reduce the risk. EPA does not have a maximum contaminant level or action level for *Legionella* but recommends a treatment technology for PWS. As noted previously, GSA is not a PWS.

GSA continues to improve operational and maintenance practices to control the growth of *Legionella* and reduce potential risks of exposure. We continue to work with CDC and industry experts to refine our testing methods and operational and maintenance practices to minimize the impact of *Legionella*.

Cooling towers are identified as high risk for the presence of *Legionella* by CDC but specific circumstances must exist for exposure to occur. Most GSA facilities do not have operable windows or air intakes adjacent to cooling towers. Moreover, most GSA facilities filter outside air with MERV filters capable of significantly reducing bacteria, including *Legionella*. While cooling tower systems typically share a common source of water in a facility, there is no interconnection with the drinking water system. These conditions significantly reduce the likelihood of exposure to *Legionella*.

In addition, increased *Legionella* testing requirements for cooling towers during the months they are in operation will be modified into Operations & Maintenance (O&M) contracts going forward. This additional testing, and any required follow-on treatment activity, will also reduce the potential exposure risk by minimizing the concentration of *Legionella* in non-potable water systems.

#### Hotline Complaint

GSA acknowledges the concerns identified in the hotline complaint. GSA's Drinking Water Quality Management Policy (PBS 1000.7A) and associated guidance of November 16, 2023, will be updated to require notification of preliminary results within one business day and notification of final testing results within three business days. These times are currently specified in notification guidance and templates developed for the national testing program that were issued on May 22, 2024 and are attached to this memorandum. PBS Region 5 did not respond to water contamination at the McNamara Federal Building in a timely manner, placing building occupants at risk.

GSA acknowledges that a more timely notification to building occupants would have been appropriate as it determined what corrective action was required to reduce risk. GSA guidance now requires the development of Water Management Plans or established corrective actions such as flushing to reduce risk.

PBS's water quality management policy does not convey a sense of urgency or include clear time frames for responding to water contamination.

At the time the McNamara Federal Building was tested in November 2023, GSA was establishing a national testing program including notification and response actions. Notification guidance and templates associated with GSA's Drinking Water Quality Management Policy (PBS 1000.7A) address the sense of urgency by requiring notification of preliminary results within one business day and notification of final testing results within three business days.

We look forward to any opportunity to update your office on GSA's progress on drinking water quality management. To date, the Public Buildings Service provided the OIG a presentation on the draft drinking water quality management policy on September 15, 2023, and the final policy was presented on November 22, 2023, just after the policy and associated guidance were issued.

PBS building management personnel did not know how to respond to water contamination, which caused delays in PBS Region 5's response.

The implications of the unprecedented scale and duration of stagnation and low water usage are an emerging issue which has led to GSA coordinating with subject matter experts (SMEs) from the EPA, CDC and the building management industry to proactively address water quality in buildings. In addition, each situation involving building water quality concerns is unique, influenced by system design, number of affected outlets, type of concern, and potential health risks that must be taken into consideration when devising a proper response action. The McNamara Federal Building was one of the first buildings to uncover these water quality issues and the complexities associated with addressing them. A significant number of points were sampled and analyzed in the McNamara Federal Building which required careful scrutiny and consideration in determining an appropriate response action. The development of the response actions at the building have informed both Region 5's and national response actions.

GSA issued the Drinking Water Quality Management Policy (PBS 1000.7A) and associated guidance in November 2023. Training to support this policy and associated guidance was developed and delivered by SMEs in the Office of Facilities Management's (OFM) Risk Management and Facility Operations Divisions to building management personnel over twelve sessions in November. Technical water response actions were developed by OFM SMEs to provide building management personnel and regional SMEs step-by-step instructions on how to respond to water contamination. OFM SMEs hold Water Quality Management Office Hours twice weekly for building management personnel to discuss policy and guidance, receive additional training and have their questions answered. Dr. Janet Stout and Dr. Abraham Cullom

of Special Pathogens Laboratory will conduct a *Legionella* education session with building management personnel and regional SMEs focused on *Legionella* basics, health risks, technical response actions and long term water management in mid-July. Collectively, these steps have improved the ability of building management personnel to deliver a more effective response to water contamination.

In addition, Region 5 and OFM's recent hiring actions have focused on improving subject matter expertise in addressing water quality. Region 5 has added an additional Industrial Hygienist recruited to provide specific expertise in water quality management. OFM is in the process of hiring an additional FTE Industrial Hygienist who is anticipated to start in early August. In addition, OFM has contracted for two Industrial Hygienists via management support contract, one of whom started on February 20, 2024 and the second is scheduled to start July 8, 2024. GSA remains committed to providing safe drinking water to building occupants. We continue to work with other Federal agencies and industry partners to improve this process.

Thank you again for the opportunity to review the draft memorandum. If you have any questions, please contact Courtney Springer, Assistant Commissioner for the Office of Facilities Management.

Attachment:

Facility Management Messaging Package 20240517

# Memorandum Distribution

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