

July 8, 2016

Since our last update, GSA has received an official citation report from the Occupational Safety and Health Administration (OSHA) and is now working to address the noted areas of concern. Some steps have already been taken -- such as restricting access to basements, crawl spaces and elevator machine rooms. Plans to address the remaining OSHA concerns will be in place before July 25.

The citation report is now posted in the cafeteria and the Federal Center reading room in Building 107. It is expected to be available in the [online reading room](#) early next week.

Building 103, 104 and 105 Mechanical Areas Update

In our message last week, GSA misidentified one of the additional heavy metals reported in mechanical areas of Buildings 103, 104 and 105. The OSHA sample detected arsenic, not chromium, along with cadmium.

Building 104 Update

As communicated last week, on June 29, the Department of Veteran's Affairs temporarily suspended work in the Records Management Center (RMC) file storage areas in response to elevated levels of lead dust found in OSHA samples. As a precaution, on July 6, VA relocated all RMC employees from Building 104 after raw sampling data showed detection of both lead and cadmium in the loading dock area.

GSA has ordered additional testing in the first floor of Building 104 to better characterize the contamination and to determine how to remediate the space. To date, all indoor air quality tests throughout Building 104 -- and the entire complex -- have returned a "non-detect" level. GSA will continue periodic indoor air testing moving forward.

The Difference Between OSHA and NIOSH

The presence of hazardous materials at the Federal Center raises two independent but parallel issues: *human health* and *regulatory compliance*. For each issue, there are different subject matter experts and thresholds for substances. This was discussed during the National Institute of Occupational Safety and Health (NIOSH) site visit last week.

OSHA addresses *regulatory compliance* issues. For some chemicals in the Federal Center setting, OSHA's stance is that any level of detection makes GSA out of compliance. The citations report issued by OSHA reflects the areas that need to be addressed for regulatory compliance.

NIOSH is advising in the areas of *human health* and exposures. From a human health standpoint, the potential risks chemicals can pose are based on a variety of factors -- including specific levels, duration and potential pathways of exposure. As part of its Human Health Evaluation, NIOSH will be providing tenants with information regarding the findings from its recent testing. GSA expects an initial summary letter from NIOSH will be sent in the next week.

Relying on the expertise of NIOSH, OSHA and environmental contractors, GSA will develop a remediation plan and work quickly to address all environmental actions at the Federal Center.

If you have any questions for GSA, please send them to us at r6environmental@gsa.gov. Inquiries received to this email will be forwarded to the proper subject matter expert for response. If you would like to add your email address to our distribution list, please use our [registration form](#) or send a request to r6environmental@gsa.gov. Previous emails may be found in the [online reading room](#).

We will provide another update next week.

GSA Region 6 Environmental Team
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