

Water Quality Management and Testing in GSA Leased Space

Questions and Answers

Will pdf files of screen shots be provided to attendees?

The event resources will be emailed to all registrants when they're available. We will also post them here: <https://sam.gov/opp/4747dd5c09e842169379612bf3859ce3/view>

What are the website addresses for: Leasing Website; Water Quality website: Water Quality Fact Sheet website?

Links to all resources and content are contained in the slides. <https://www.gsa.gov/real-estate/real-estate-services/leasing/lessor-resources/water-testing-modification-effort>

Where in the lease does it address the authority for GSA to issue these ULA?

The Government's right to order services is found under the "Changes" clause of the lease. The changes clause can be found in the General Clauses (GSA Form 3517) which is included as an attachment/exhibit to the lease.

When will we receive our Scope of Work?

You will be notified by GSA about 5 days prior to our sending you the Unilateral Lease Amendment containing the scope of work. At this time, locations are being selected to appropriately manage workload and responses.

I received an email yesterday from dss@docusign.gsa.gov yesterday. Is that my notice?

Yes. The notice is from DSS Docusign.

Do we hire an independent company to come take the sample and test it?

Yes. Please follow the scope of work in the ULA.

Do you have a list of approved testing companies?

We cannot provide a list of firms; however, if you encounter difficulty in locating a suitable firm, a helpful suggestion is to conduct a search for "industrial hygiene consultant" or "environmental consultant" in your local vicinity or the nearest major city using search engines such as Google.

Does the Consultant need an ASSE certification to pull these samples?

No, this is not a requirement. PBS defines a qualified professional as an individual experienced in environmental, industrial hygiene, or engineering consulting with a minimum of two years of onsite experience in conducting potable water sampling, which includes microbiological sampling methods for Legionella. Preference must be given to qualified professionals that hold either an ASSE 12080 certification, a certified industrial hygienist (CIH) designation, or a health and safety professional working under the supervision of a CIH or an ASSE 12080 certified individual.

Does the lab performing analysis need to be 3rd party?

If the lab is able to meet the assessment, sampling, and deliverable requirements, then the lab is able to collect samples and analyze them. However, the laboratory and sampler should be third parties from the lessor.

Are plumbed water coolers included in this testing since they are not "fixed" fixtures? Is the Property Owner/Manager responsible for remediation of these assets which were installed by and maintained by the tenant? Are Refrigerators with water lines included in sample counts

Tenant owned equipment is not to be included in this water testing initiative.

What if the water fountains in the location are not used and shut off? Do we skip the fountains? We use water bottles for drinking water at this location.

If the water supply to the water fountains is shut off, they are not required to be included in testing. Please document the reason that the water fountains have not been included in the assessment in the deliverable report.

If restrooms are excluded from this requirement and there are less than five fixtures that meet the requirement then do all of those fixtures get tested?

For purposes of the water testing requirements in this baseline water testing initiative, bathroom sinks are not considered "designed for human consumption" and are not required to be sampled. If the leased location has less than 5 water fixtures that meet the criteria of being designed for human consumption then test all available fixtures that meet the criteria. The only exception for the testing of bathroom fixtures is if the bathroom fixture is the only source of potable water in the leased space, including common areas.

Common area bathrooms are not required to be tested?

For purposes of the water testing requirements in this baseline water testing initiative, bathroom sinks are not considered "designed for human consumption" and are not required to be sampled. The only exception for the testing of bathroom fixtures is if the bathroom fixture is the only source of potable water in the leased space, including common areas.

Did I hear correctly, restroom fixtures are not included?

For purposes of the water testing requirements in this baseline water testing initiative, bathroom sinks are not considered "designed for human consumption" and are not required to be sampled. The only exception for the testing of bathroom fixtures is if the bathroom fixture is the only source of potable water in the leased space, including common areas.

I assume no bathroom sinks since this is not drinking water?

For purposes of the water testing requirements in this baseline water testing initiative, bathroom sinks are not considered "designed for human consumption" and are not required to be sampled. If the leased location has less than 5 water fixtures that meet the criteria of being designed for human consumption then test all available fixtures that meet the criteria. The only exception for the testing of bathroom fixtures is if the bathroom fixture is the only source of potable water in the leased space, including common areas.

If you don't have five "kitchen" sinks and drinking fountains that the tenant has access to, do you need to do two restrooms or other suite locations?

For purposes of the water testing requirements in this baseline water testing initiative, bathroom sinks are not considered "designed for human consumption" and are not required to be sampled. If the leased location has less than 5 water fixtures that meet the criteria of being designed for human consumption then test all available fixtures that meet the criteria. The only exception for the testing of bathroom fixtures is if the bathroom fixture is the only source of potable water in the leased space, including common areas.

The lease space has 16 sinks, 1 cafe sink, nurses office sink, 3 drinking fountains, 1 high low drinking fountain and 4 showers? How many tests are needed?

In this case, you would test a minimum of 5 outlets for all of the water quality parameters (lead/copper, legionella, coliform), 1 shower for legionella only, and the nurses office sink for legionella only.

Are we only required to test a max of 5 locations or do we have to test more if there are more than 5?

The GSA scope of work lays out the sampling requirements. If there are more than 50 outlets in the leased space and common areas where GSA tenants or their visitors might expect access to drinking water, more than 5 samples are needed to meet the 10% requirement. If there are fewer than 50 outlets, a minimum of 5 should be sampled. Additionally, showers, child care centers, and health care facilities have specific additional sampling requirements

I understand I don't have to test my 16 restroom sinks, but I do test the drinking fountains and cafe sinks where we think they can use the water for consumption? What about showers?

Yes, with information provided, the cafe sink and drinking fountains would be the required sample locations. Additionally, if there are showers present in the GSA leased space or areas where GSA tenants or their guests might reasonably expect to have access, then 1 of every 3 showers should be tested for legionella. Fitness centers that are not part of the GSA leased space are not required to be included in this initiative.

GSA leases a small portion of our building. There are no water fountains or bottle fillers on the same floor common areas (second floor of a two-story building), only restrooms and a kitchenette common to tenants on the second floor. Does that mean water only in the kitchen (tap and/or refrigerator water) need to be tested?

Based on the information provided, the kitchenette sink would be the appropriate location to test. If there are water fountains or bottled water filling stations that are in common areas on the first floor where GSA tenants may have access, they too should be included in this testing requirement.

Do I need to have the water in the restroom sinks tested if these are the only building water sources the GSA tenant has access to?

Yes, this would be the only situation where restroom sinks would be required for testing.

What if the space has labs with sinks that are not being used for human consumption.

Laboratory sinks do not meet the criteria specified in the scope of work, as they are not primarily designed for human consumption.

We have a gym in the building which GSA employees can use. It has 4 showers, 4 sinks and a water filler. Should all points be tested?

Fitness centers that are not part of the GSA leased space or that are not specified as an amenity under the GSA lease are not required to be included in this initiative.

Are Fitness Centers which are or are NOT included in the cost of the lease (IE a paid membership) are those fixtures included in sample counts?

Fitness centers that are not part of the GSA leased space or that are not specified as an amenity under the GSA lease are not required to be included in this initiative.

Will we be required to test outside the boundary of the GSA's leased space actual space they lease?

Water testing must be performed in GSA leased space and all building common areas to which the GSA tenants and its visitors have access and would reasonably expect to use, including but not limited to areas such as the lobby, restrooms, hallways, elevator lobbies, waiting areas, and indoor parking areas.

If our leased building is not on a deep well, but it is on city / municipal water system, who already does testing, is this GSA WQT still required? And / or could we secure and submit reports from them?

Water testing is still required within the leased space. Being supplied by City and municipal water systems testing is not sufficient to confirm water quality at the fixture level. Fixtures may be impacted by premise plumbing.

If the building is new, with PEX piping and water is directly supplied by the municipal water supply is testing required?

Water testing within the leased space remains necessary. Relying solely on testing from city and municipal water systems isn't enough to ensure water quality at the fixture level. Fixtures can be influenced by premise plumbing, including materials commonly used in newer constructions.

What happens if the issue is caused by pipes outside of the building?

The Lessor is still required to provide potable water for tenants and visitors to the Government space.

What happens if there is a water quality problem upstream of the building and beyond the lessor's control to correct? Or beyond GSA's control to correct in the case of a federally owned building. Would providing bottled water and water coolers to the end users suffice?

The Lessor is still required to provide potable water for tenants and visitors to the Government space. Alternative sources like bottled water and washing stations are acceptable substitutes for potable water.

Is this a one time testing requirement, or will it be required ongoing / routinely in the future? If the testing is clear, how often are we required to test during the lease?

As of now, we only anticipate this one-time baseline testing. Once we know more about the status of the water in the inventory, we will reassess our long-term requirements.

For Legionella, is CDC or ISO method required?

The scope of work requires the following: Analyze all water sampling using the traditional spread-plate Legionella culture method (based on ISO 11731:2017 and/or the U.S. CDC methods published in 2005) .

Are there specific methods for the testing - Legionella has two methods? Will coliform bacteria be presence/absence?

There are specific test-method and sampling requirements stipulated for each sample type within the GSA scope of work. The method required for coliform is presence/absence.

I am not sure you will address the actual sample collection, however, is the sampling required to be a first "on" grab or allow flow for a set time/volume prior to sample collection?

For metals, the samples must be first-draw. Legionella samples should be collected as close to first-draw as practical. Prioritizing the collection of a first-draw metals sample is required. When sampling for both metals and Legionella from the same tap, metals should be collected first. If hot water is accessible, obtaining a Legionella sample from the hot water line is minimally affected by collecting a first-draw metals sample from the cold water. In the absence of hot water, collect a first-draw metals sample first and then promptly follow with a Legionella sample. We specified a 250 mL sample volume because, after collecting a 250 mL sample for metals, a subsequent 250 mL Legionella sample should still approximate a 'first draw' sample.

For Legionella testing, is it required to also sample from the main inlet city water supply, all domestic hot water tanks and expansion tanks in addition to the 10% fixture requirement?

No, this requirement is not applicable to the Public Buildings Service Scope of Work for Drinking Water Testing In GSA Leased Facilities.

What happens when the water you receive from the government continually has legionella in it. Who will enforce them to provide clean water?

Legionella is found naturally in freshwater environments, like lakes and streams. These bacteria can become a health concern when they grow and spread in human-made building water systems. The Lessor is still required to provide potable water for tenants and visitors to the Government space.

How do we know exceedances?

For legionella, recommendations from the CDC Toolkit are used as action levels or thresholds for compliance with this initiative. Corrective actions are required for any legionella sample with a concentration of 1 colony forming unit per milliliter (CFU/mL) or greater. For lead and copper, EPA drinking water action levels are used for this initiative and applied to each sample location. For lead, any samples that exceed 15 micrograms per liter (ug/L) require corrective action. For copper, any samples that exceed 1.3 milligrams per liter (mg/L) require corrective action. The detection or presence of coliform or E. coli in a drinking water sample requires corrective action. In phase 4 of unilateral lease amendments additional language will be added to the scope of work to more clearly identify the above described exceedance levels.

If testing reveals issues, will deficiency notices be given to Lessors?

If testing reveals water quality exceedances, your GSA Lease Administrator Manager (LAM) will send you an email to acknowledge receipt of test results, confirm next steps, and open a dialogue towards remediation. In the event the Potable Water requirement in the lease contract is not met, GSA will issue a deficiency letter.

Will the timing allotted to resolve any issues and complete any remediation be designated by the GSA?

Corrective action plans should be developed and submitted by the lessor. GSA does not submit the plans. Submitted corrective action plans and associated completion dates will be reviewed by GSA (Lease Administration Manager, Lease Contracting Officer and Industrial Hygienist) prior to acceptance. If applicable, needed revisions will be communicated back to lessor.

How will Legionella results interpretation handle a scenario where results indicate that Legionella growth is both well controlled and poorly controlled? E.g., Legionella is detected in a few locations, but at concentrations >1 CFU/mL. Would corrective actions be required if ANY threshold for poorly or uncontrolled growth is met?

Yes, corrective actions are required at any and all locations where legionella concentrations are detected at greater than or equal to 1 CFU/mL.

Is the lessor allowed to add any overhead costs to the invoice for testing?

The Independent Government Estimate (IGE) included an assumed Lessor administrative fee.

If we cannot find a local qualified company to complete the testing but have a company that can travel in, is the building owner responsible for the travel costs?

Travel costs may be added to the lessor's proposal, and the proposal must be fair and reasonable.

Can a draft of these Lease Amendments be shared?

GSA is modifying these leases in phases. Each phase may contain slightly different language to reflect "lessons learned" based on prior issuances. Please see the lease amendment sent specifically for your lease to ensure you are following the correct ULA and SOW.

Who is performing testing in GSA leases where the Government is responsible for operations and maintenance services?

GSA is responsible for testing GSA leases where the Government is responsible for O&M.

Can Lessors opt for GSA to procure the testing themselves?

No. Lessors are expected to complete the testing in accordance with the changes clause of the lease. If the Lessor has provided an explanation to GSA of why it cannot complete the testing itself, and GSA has agreed to accept the explanation and release the Lessor of its obligation, GSA will complete the testing itself. The Lessor remains responsible to provide all necessary support to allow GSA to complete the testing. The Lessor will remain responsible for any remediation costs.

We should not do testing until the ULA is received, correct?

Testing prior to the government ordering the testing runs the risk that you will test a location that does not need to be tested or that your testing will not meet the requirements of the scope of work. It is a best practice to ensure the government has ordered the testing prior to performing a test.

I have only received one ULA - We have two other GSA spaces in the same building. Should I hold off for the other ULA's before I start the testing?

Please reach out to your Lease Administration Manager. This is a special circumstance.

How do we update our contact information to make sure the notices from GSA arrive to the appropriate person?

Please update your contact information on SAM.gov. You should also reach out to your GSA Lease Administration Manager (LAM) to ensure they have your updated contact information on file.

Can you please clarify: The presenter said 30 days, but the slide said 90 days for Lessors to set up the water testing.

Lessors have 90 days to provide all deliverables to the government. Lessors should immediately begin acting on these ULAs in order to meet the 90-day timeline. Getting a test scheduled and coordinated within 30 days will help in continuously moving things forward.

I'm concerned about being able to meet all these deadlines. What do we do if we can't meet them? They are all pretty short such as 90 days to get this all done from receipt for the scope of work and the 3 days from completion to provide the invoice.

Ninety days should be enough time to complete the initial testing. If you find that additional time is needed, please reach out to the GSA LAM provided in the ULA and request an extension. All extension requests will be considered.

The requirement to submit the invoice 3 days after testing doesn't seem realistic. It will be very difficult to get the invoices this fast.

The invoice is not due until the full scope of work has been completed. The GSA LAM will follow up to request the invoice if it has not been received within 3 days. There is no penalty if it takes longer than 3 days to provide the invoice after the completion of the scope of work.

Does the scope of work state the due date?

The due date is 90 days from the date of signature on the Unilateral Lease Amendment which is the same day it is delivered.

If I am out of the country, can I get an extension to file an invoice within 90 days?

Please reach out to your Lease Administration Manager to discuss any questions or concerns.

Per the SOW it states that the samples need to have barcodes for identification. Some labs don't offer this option, do we just purchase barcode stickers and add them to the sample bottles or is there an alternative?

This requirement applies only if the laboratory utilizes this particular method. If the sample bottles are equipped with barcodes, they should be photographed. Otherwise, this step may be omitted.

If the building engineers are already doing a weekly ORP reading test do they need to continue doing it?

This question is outside of the scope of the baseline drinking water test initiative. GSA doesn't assess your building's preventative maintenance activities. Typically, oxygen reduction potential testing is utilized for maintenance purposes related to non-potable equipment and is separate from monitoring water quality at point-of-use fixtures.

For tenant agencies with very high security clearance protocol, if the testing contractor must return to the property, do they have to complete LAR clearance (which can take a month for clearance) or will this be waived in the interest of time to complete this (assuming they are cleared for basic entry)?

Generally, after the initial request has been submitted and granted, subsequent requests are processed more quickly. However, access requirements can vary by location, and it is best to reach out to the GSA LAM assigned to the specific location for information or assistance submitting the access request.

Will Leased VA Facilities be included in this?

This is a GSA-initiated activity. VA Facilities leased by GSA are included in our testing effort; however, VA Facilities leased by VA either via a delegated or direct authority are not.