



DATE: July 25, 2023

FROM: Sylvia Hermann, Service Center Director, Michigan Service Center
GSA Region 5 Public Buildings Service

TO: Internal Revenue Service
U.S. Customs and Border Protection
U.S. Department of Labor
U.S. Navy
Social Security Administration
Department of Health and Human Services OIG
U.S. Immigration and Customs Enforcement
General Services Administration
Federal Protective Service
Jones Lang LaSalle, Inc
Gesher Human Services
Kone INC
The Christman Company
Guestraunt
The State of Michigan, Bureau of Services for the Blind Persons

CC: Angel Dizon, Regional Commissioner
Rob Green, Deputy Regional Commissioner
Michele Sharples, Director, Northern Service Center Operations Division
William Renner, Director, Facilities Management Services Programs Division
Massiel Lucca Amador, Manager, Energy, Environmental, & Sustainability Branch
Thomas Hawkins, Regional Counsel
Robert Foltman, Regional Counsel

SUBJECT: Follow Up Notification Concerning Water Quality

On June 9, GSA issued a notification regarding water quality concerns affecting the Federal Building at 985 Michigan Avenue in Detroit, MI.

Since that date, GSA has taken the following steps to address the concerns:

- closed the building to the public and tenants, with limited exceptions;
- provided bottled water and hand-washing stations to the limited number of occupants remaining in the building;
- posted signage to refrain from using or consuming water from drinking fountains, kitchenettes, or restrooms;



- executed an enhanced, remedial flushing of the entire building to remove potential sediments and bacteria in the potable water piping system;
- conducted post-flush testing of the quality of the drinking water to confirm effectiveness of flushing; and
- worked with the building's operations and maintenance services contractor to review and revise their weekly flushing program to ensure its adequacy.

Upon receipt, GSA has shared testing results via tenant update meetings and emails. These testing results are summarized below in Table 1. Threshold exceedances for lead, copper, and legionella were identified within the building's drinking water supply, and exceedances for total coliform, E. coli, and legionella were identified within the building's cooling tower.

GSA is hiring a consultant that specializes in legionella remediation and management to:

- conduct an assessment of the building's systems as a whole;
- address the lead and copper exceedances;
- develop and implement an immediate remediation plan;
- conduct verification testing to ensure the plan was effective; and
- develop a long term management plan to incorporate into the building's operations and maintenance moving forward.

Please ensure your affected employees and contractors, and their respective employees, are notified of this information.

Employees and contractors can be referred to available CDC, EPA, and OSHA guidance below, which outline risks of exposure.

- CDC's "[Chemicals That Can Contaminate Tap Water](#)"
- CDC's "[ToxFAQs for Copper](#)"
- EPA's "[Basic Information about Lead in Drinking Water](#)"
- CDC's "[Lead in Drinking Water](#)"
- CDC's "[Legionella \(Legionnaires' Disease and Pontiac Fever\): Causes, How it Spreads, and People at Increased Risk](#)"
- OSHA's "[Legionellosis \(Legionnaires' Disease and Pontiac Fever\)](#)"

This letter serves as GSA's notification, per GSA Order PBS 2400.1, Risk Management Notification. GSA will continue to provide updates as the situation progresses.

If you have any questions, please feel free to contact GSA Property Manager Troy Brown at troyw.brown@gsa.gov or (313) 520-7037.

Table 1 - Summary of Testing Results

Floor	Sampling location	Total Coliform	E. coli	Lead (mg/L) *	Copper (mg/L) *	Legionella PCR (rapid testing)	Legionella Culture (CFU/mL) †	Legionella Species
1	ICE 1st Floor Weapons Cleaning Area	Absent	Absent	0.002	0.655	Not Detected	Not Detected	
1	ICE 1st Floor Holding Facility Furthest Cell	Absent	Absent	Not Detected	0.355	Not Detected	480	Legionella species (fluorescent)
2	HHS-OIG Suite 234	Absent	Absent	0.001	1.950	Not Detected	Not Detected	
2	ICE 2nd Floor (Kitchenette)	Absent	Absent	0.013	7.880	Not Detected	Not Detected	
4	SSA-TSC 4th Floor	Absent	Absent	0.002	8.460	Not Detected	Not Detected	
4	DOL BLS Suite 410	Absent	Absent	Not Detected	1.290	Not Detected	Not Detected	
5	CBP-OCC Suite 520 (Kitchenette)	Absent	Absent	0.006	8.880	Not Detected	Not Detected	
5	CBP Audit Office (Kitchenette)	Absent	Absent	Not Detected	0.500	Not Detected	Not Detected	
6	SSA-ADO 6th Floor	Absent	Absent	Not Detected	1.460	Not Detected	Not Detected	
6	OIG Suite 620	Absent	Absent	0.004	1.410	Not Detected	Not Detected	
6	Navy Suite 649	Absent	Absent	Not Detected	1.040	Not Detected	540	Legionella species (fluorescent)
7	IRS Break Room 710 (Kitchenette)	Absent	Absent	Not Detected	0.319	Not Detected	Not Detected	
7	IRS 7th Floor Union Break Room	Absent	Absent	Not Detected	0.632	Not Detected	Not Detected	
8	IRS 8th Floor East Offices by 809-02 (Kitchenette)	Absent	Absent	0.006	7.170	Not Detected	Not Detected	
8	IRS 8th Floor South Offices by 810-09 (Kitchenette)	Absent	Absent	0.001	2.140	Not Detected	Not Detected	
9	IRS 9th Floor 910-04 (Kitchenette)	Absent	Absent	0.002	2.310	Not Detected	<1	Legionella species (fluorescent)
9	IRS 9th Floor by 907-22 Break Room	Absent	Absent	Not Detected	0.348	Not Detected	Not Detected	
9	IRS 9th Floor by 908-12 Break Room	Absent	Absent	Not Detected	0.207	Not Detected	Not Detected	
10	IRS 10th Floor by 1009-07 (Kitchenette)	Absent	Absent	Not Detected	0.816	Not Detected	Not Detected	
10	IRS 10th Floor by 1009-08 (Kitchenette)	Absent	Absent	0.005	0.456	Not Detected	<1	Legionella species (fluorescent)
10	IRS 10th Floor by 1009-07 Break Room	Absent	Absent	0.165	5.030	Not Detected	Not Detected	

11	Penthouse Spigot by Storage Room PT104	Absent	Absent	0.015	0.529	Not Detected	Not Detected
LL	IRS LL Machine Area	Absent	Absent	Not Detected	0.430	Not Detected	Not Detected
LL	LL16 Fire Pump Room (Main Water Line)	Absent	Absent	0.024	0.073	Not Tested	Not Tested
LL	LL15-1 Water Meter Room (Main Water Line)	Absent	Absent	Not Detected	0.028	Not Tested	Not Tested
Roof	Roof Cooling Tower #3	Present	Present	Not Tested	Not Tested	Approx. 15-40 CFU/mL	20 Legionella pneumophila not serogroup 1

Notes:

* U.S. EPA Primary Drinking Water Standards establish action levels for lead and copper as 0.015 mg/L and 1.3 mg/L, respectively.

† CDC guidance defines < 1 CFU/mL (potable) and < 10 CFU/mL (non-potable) as thresholds for systems where legionella growth appears to be well controlled.