



Client Enrichment Series – Q & A



Topic: Water Quality Management in GSA Facilities- Update

Date of Presentation: June 17th, 2026

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Water Quality Management Session Resources:

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Question: I understand water management plans are required for GSA-controlled facilities. What about GSA lease spaces and facilities?

Answer: With GSA owned facilities that meet the applicability requirements, those are going to have the ASHRAE 188 water management plans. This is a voluntary initiative on the part of GSA, and there are no regulatory requirements that we put these plans in place. That is why we keep referring to this being an above standard approach. Lessors are still required to provide drinking water that complies with applicable regulatory requirements but we cannot impose on them this requirement of them installing these water management plans, or conducting additional testing.

Question: Going from PBS 1000.7A to 1000.7B, it seemed like water quality testing requirements were scaled back from all properties that are over 1000 square feet to only those that had concerning results from the baseline testing or other risk factors. If I have this correct, I was hoping you could talk about the decision not to require ongoing surveillance for all or most facilities?

Answer: The requirements for the 10 stories or higher is based on discussions with CDC and VA. These are considered high risk facilities. Which is why we targeted those and we are requiring those to have an ASHRAE 188 water management plan. That doesn't exclude other facilities of any size from having one developed. If your facility has a history of water quality issues, if you know there is a lot of sediment in your water or you are getting a lot of lead or copper hits or even iron, we can put a water quality



Client Enrichment Series – Q & A

management plan in place on the recommendation from the Industrial Hygienist (IH), after we do some more testing and figure out what is going on. So it is not exclusionary, we are not saying we won't test, it

is just saying these are the ones where we are absolutely requiring testing because they are considered high risk at the time.

Question: Are potable water issues a landlord responsibility or do tenants need to submit an RWA for assistance?

Answer: Lessors are required to provide drinking water that meets the regulatory definition of potable water defined by OSHA and EPA. If the issue is related to that, then the Lessor would be responsible for remediating that issue.

Question: Where can I find the information on the Legionella guidelines stating it is non harmful/ does not correlate directly with any disease risk? I have multiple individuals at an LPOE (Land Port of Entry) that are very concerned regarding Legionella and are not wanting to drink the water.

Answer: The best source is to go to the CDC website. They have a lot of information about Legionella and potable water and how to manage it. There are several discussions there about Legionella being safe. It's more of a water management thing, than a health risk or health- related issues. CDC is a very good source, and the VA has a little bit of information too.

Question: Aerosolization exposure - what is considered aerosolization? Is it where water is hitting the fountain bottom splashing up in small amounts and individuals breathing it in? These questions come from questions I have been asked from occupants.

Answer: In industrial hygiene, aerosolization of water is the process of converting bulk liquid water into fine, airborne droplets or mists (typically $\leq 50 \mu\text{m}$ in diameter) that can remain suspended in the air and be inhaled.

Question: Will WMPs (Water Management Plans) be implemented automatically in buildings that meet the requirements? Or will that be left up to local GSA staff to decide?

Answer: For buildings that meet the ASHRAE requirement standard, which is 10 stories and above, WMPs will be implemented in those facilities. We are going to be working with our acquisition community and the local building staff, as well as our O&M contractors, to bring in specialized vendors at those 200 some locations to develop and implement those plans. That is happening at a minimum. Where there is discretion, is if it doesn't meet the 10- story requirement, but there were issues uncovered from baseline testing. Example: It is not a 10 story building, but it is a million square feet, that is obviously a complex plumbing system. And that discretion is a conversation between the building management staff, and our industrial hygienists (who are the subject matter experts). There are a number of buildings that through the baseline testing initiative we determined that an ASHRAE 188 management plan was appropriate and corrective action was needed; and we have gone through putting that in place even though the buildings were not 10 stories or more.

Question: How often does GSA test the water?

Answer: What we have done over the last three years is what we called the Baseline Testing Initiative. There's no requirement that we test our water regularly for any of those parameters. But we wanted to get an idea of where we stood in these facilities. Then we took what we were seeing following that testing, to make determinations of what sort of corrections we need to put in place immediately, and what sorts of long-term corrections should we be putting in place. Anecdotally, one of the big things we saw was the hot water temperatures. Keeping that temperature at 140 degrees, we noticed, was a really



Client Enrichment Series – Q & A

critical corrective action that helped us when we uncovered Legionella in certain locations. So the test result came in, we saw Legionella show up, we raised those water temperatures, re-tested, issue

resolved. As mentioned at the very beginning, very simple operational and mechanical adjustments were able to be made throughout the effort that we will continue into the future. As far as continued testing; buildings that are getting these ASHRAE 188 water management plans will be required to do periodic sampling at least once annually. If a building has an ASHRAE 188 plan, to validate that the plan is working, testing will be done once every year, at a minimum. A majority of plans being put in place are actually testing twice annually, or even quarterly; and that's just of the potable water. One of the bigger concerns around water quality and safety comes from this equipment that can aerosolize water such as cooling towers, directive fountains, misters, et cetera. Any building, regardless of whether it meets applicable ASHRAE standards, that has any of those equipment will have to test the water in that equipment at least twice while it's in operation. So even if a building is not over 10 stories, but has a cooling tower that is running from April to October, it is going to be tested at least twice, to ensure Legionella levels are safe.

Question: Can you go over the cyclic testing policy for GSA leased facilities (how often, cost to tenant, coordination POCs, potential for focused testing based on a customer concern)? Thanks.

Answer: There are no requirements that hold a lessor to have to do any sort of regular, recurring testing. If an issue arises, it is the lessor's responsibility to provide potable water per industry regulations, and we can work with them to ensure that occurs. Again there is no regular cadence, it's more when something comes up that we inspect the terms of the contract, which state that the water must be potable, not occurring, then we can work with the Lessor to get the testing done.

Question: What about testing for Arsenic in the South West given the prevalence in the local water supplies?

Answer: We review the Consumer Confidence Report for drinking water annually. It is one of our requirements to review it with the O&M (Operations and Maintenance) and look for any Notice of Violations (any NOVs) and in particular, arsenic. If the city is reporting to us that we are getting hits of arsenic in the drinking water, then we will pursue testing arsenic at our facilities to ensure that they are at a safe level. For the buildings we are aware of this issue, we review the reporting very closely and we monitor the situation. We are aware of the situation in our southwest facilities and in some of our facilities we have installed some reverse osmosis and some other things to remediate the arsenic that was coming from the cities. We are working with the cities and having conversations with them as well to see what they are doing to ensure the drinking water coming into our facilities is safe.

Question: Can you also talk about why the trigger for having a WMP (Water Management Plan) is the height of the building? What is the guidance for large facilities or large campuses that have a significant footprint but not the vertical height? I didn't think legionella or other water quality issues care only about the number of stories.

Answer: We pulled that 10 story requirement from the ASHRAE standard. On the CDC website you will see a checklist for whether or not a building should have an ASHRAE 188 plan. There is a list of questions that make this determination. Such as is the facility a healthcare facility? We do not have any healthcare facilities in our inventory. Do we house people overnight? Which does not occur in our buildings. So the only question that applies to us is the 10 stories or greater. That standard was developed by a panel of experts years and years ago. One of the experts was Dr. Janet Stout (who has participated in a past Client Enrichment Session. You can watch the presentation she did for us about Legionella on our website. Highly encourage you to check it out). In regards to the large facilities or large



Client Enrichment Series – Q & A

campuses; we are well aware of buildings that may not be 10 stories tall, but if you turn 10 stories to its side, it would equate to that size. Which means it equates to a complex plumbing system. We work with

our building managers to identify those locations and put a water management plan in place. The 10 stories is just the minimum and then we go through and determine other locations that we want to put Water Management Plans in place. The bottom line is the bigger the building the more complicated the plumbing system, the more likely there is going to be infrastructure that could be problematic for Legionella; a lot of hot water storage tanks, long funnel of distal legs and plumbing risers. There is no hard and fast rule why they say 10 is the cutoff. It is a nice round number that ASHRAE decided on. But again if it happens to be a single story building with a large footprint and a complicated plumbing system, we will consider evaluating whether or not it needs a water management plan

Question: What are the standards for Agencies with Delegation Authority?

Answer: Agencies will follow all regulations and SOP for delegated buildings. Agencies with delegated authority will provide potable water at point-of-use outlets. OSHA 29 CFR 1910.141(b)(1)(i) mandates that potable water must be provided in all places of employment for various purposes, including: drinking, washing of individuals, cooking, washing of foods, cleaning cooking or eating utensils, washing food preparation or processing areas, and personal service rooms.

Question: How/who do we talk to about buildings that have systemic water challenges? Who will decide if those buildings will have the WMP (Water Management Plan) funded?

Answer: A great place to start is with the building manager for that particular facility. From there they can escalate to the team of Industrial Hygienists within our Programs and Services Department. Through the baseline testing effort, we have gotten a pretty solid awareness of any of those buildings that have had systemic, or historic water challenges. It was a great comprehensive look into each specific locations water history and current water quality

Question: Are the installation of water filtering systems to include reverse osmosis recommended?

Answer: Reverse osmosis is a case by case, building by building solution depending on what contaminant we are dealing with. Reverse osmosis is for very ultra-fine contaminants, such as bacteria, Legionella or any other super ultra-fine particulate coming in from the city side. We do not conduct a blanket, across the board reverse osmosis because even that, in itself, can create its own sets of problems by filtering out too much, causing the drinking water taste to become a little skewed, which then will allow the bacteria to come through and breed a little more.

Question: Can you tell us if any PFAS (Per- and Polyfluoroalkyl Substances) testing has been accomplished, specifically in the NCR?

Answer: To the best of our knowledge GSA has not conducted PFAS sampling specific to the drinking water systems that we own or operate. EPA and states require PFAS testing and those results are reported with the annual report, the Consumer Confidence Report, that all regulated drinking water systems are required to put out to their communities;. Specific municipalities will have a drinking water website that will have the links to those annual water quality reports and in there will have the results of a wide variety of different types of sampling that has been done. Including any of these PFAS sampling that are now required to be done in accordance with EPA and state environmental regulations.

Question: Will Agencies receive an update regarding the SOW (Statement of Work) for Leased facilities? Will the Lessor be aware that sampling is not allowed in restrooms?



Client Enrichment Series – Q & A

Answer: Lessors are required to provide drinking water that meets the regulatory definition of potable water, as defined by OSHA and EPA. For issues related to that, the Lessor would be responsible for

remediating that issue. There is no requirement for routine sampling. Baseline drinking water sampling does not include sampling bathrooms.

Question: Is there a GSA website or fact sheet that we can provide to individual employees to learn more? Signage in the building by itself has caused alarm to those at higher risk from legionella. It would be helpful if they had something to share with a physician to determine if they should be in the building or not?

Answer: Yes, the website is www.gsa.gov/waterquality. There is a ton of great information. Lots of FAQs. A 10 minute video that the industry experts, Dr. Janet Stout and Dr. Abe Column provided to us. Lots of references to the CDC's website and the various industry consultants we worked with to come up with our new plan. The CDC website has a lot of information about personal health, so if someone is immunocompromised and falls into those risk categories, it walks you through the sorts of things that you should be aware of when interacting with public water.

Question: Does GSA conduct water testing for faucets connected to Reverse Osmosis water filtration systems? Or the water samples are only collected from unfiltered sources?

Answer: Yes, GSA did conduct water testing for faucets connected to Reverse Osmosis in known areas and it was documented during sampling collection.

Question: Can you clarify the 1000.7B requirements for ongoing monitoring? It seemed like most facilities would not be required to do ongoing sampling for a range of water quality parameters (e.g., pH, temp, etc.) or endpoints (like lead, coliforms, etc.). I would think large facilities should be doing regular monitoring. How would we know the response actions are triggered if we don't sample on a routine basis?

Answer: To your point large facilities- those that meet the 10 story or taller criteria, or the one story with a million square feet or those with water quality issues- we are going to be putting those plans in place that will require continuous monitoring and validation. We do other types of routine testing, such as residual chlorine (water coming from public water supply) making sure it is at detectable levels because that is the first line of defense against the growth of bacteria. There will be testing that happens, but it is not going to be the baseline testing that happens on a recurring basis. We sometimes do a lot of things that we call **monitoring**, things that we can measure on the spot, using handheld meters, things like chlorine, things like temperature, things like pH, so a lot of that doesn't really fall into sampling (where we actually collect a physical sample of that water and send it off to a laboratory. From an Industrial Hygiene perspective, that's usually what we think of as sampling). But we do routine measurements on our water systems. One of the more fundamental portions of a water quality management plan is having these measurable control points. Measurement will continue to be an important tool in our toolbox for all facilities, whether or not that facility gets routine sampling where we actually collect a physical sample of that water and submit it to the lab.

Question: How are the results being communicated with health and safety staff (both at GSA and with tenants) so we are all meeting OSHA (Occupational Safety and Health Administration) requirements?

Answer: Communication goes out from building manager to agency POCs.



Client Enrichment Series – Q & A

Question: Will GSA provide a comparison chart denoting the changes between the new and previous water quality program?

Answer: A summary was provided in a recorded training presentation. Updates aligned with industry standards.

Question: Where can we find the baseline reports for our facilities?

Answer: Building Manager would be the point of contact for sample results.

Question: How are these WMPs (Water Management Plan) funded? Will there be an increase in rent as a result of having a WMP added?

Answer: WMP plans are funded by GSA.

Question: What are the requirements for facilities that are delegated?

Answer: We will be updating our SOP for delegated facilities and it will incorporate the water quality management order that we are briefing on, the revisions to it, as well as associated desk guide. Those will be expected to be implemented in our delegated facilities as well.

Question: Will there be any specific requirements for child care centers?

Answer: Yes, we will still test the water in our childcare centers annually. The big concern with childcare centers and children in general is about those metals found during the baseline testing. Annually we do test those fixtures that are fit for consumptions for those sorts of parameters. In addition, it is now a requirement for all of our childcare providers to flush all Point of View outlets within their space on a weekly basis. We encourage them to do it on Mondays. They go through and perform a flushing, per guidance that we provide them, and we also provide them a log. And GSA checks periodically to ensure that is happening.

Question: If we want to offer filtered water systems like Culligan, or Aramark vendors for instance, does GSA have a preferred vendor?

Answer: GSA does not have a preferred vendor. Much of that is handled at the local level with the building manager.

Question: What assistance is available to federal facilities that are not owned by GSA regarding managing and monitoring water quality?

Answer: We are willing to have a conversation and walk through the steps that GSA took and provide any help that is needed. We have learned a lot over the last three years, and there is already a breadth of knowledge that the baseline testing has really opened our eyes to. So please feel free to reach out directly.

Question: POC for follow on questions please?

Answer: Please reach out to waterquality@gsa.gov

Question: If there are outstanding issues identified during baseline sampling efforts (ex: lead/copper exceedances, TC+ results, legionella identified), will GSA continue to work to resolve those?

Answer: Yes, absolutely. Our baseline testing corrective action checklist requires us to continue re-testing. If we get results that exceed the threshold, we will implement corrective actions, specific to whatever was found, whether it was lead, copper, Legionella etc; then we are required to retest until those exceedances are resolved. Once we get what we consider all clear, then we consider the baseline test resolved.



Client Enrichment Series – Q & A

Question: Can you provide the contact information for the water quality team?

Answer: Contact waterquality@gsa.gov

Question: Who should we contact if follow-up testing has not been completed for high copper levels?

Answer: Contact the Building Manager.