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TO: Angel Dizon, Regional Commissioner, Great Lakes Region

CC: Courtney Springer, Assistant Commissioner, Office of Facilities Management
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SUBJECT: Satisfactory Test Results and Building Opening Status
985 North Michigan, Detroit, Michigan

For the 985 Michigan Federal Building, testing results for IRS and ICE space on the Lower Level and First Floor meet the required levels established for safe occupancy. Following is a summary of the test results, other conditions in place for safe occupancy and corrective actions.

Testing Results

As shared in tenant meetings and communications, GSA is performing representative sampling for total coliforms and E. coli, metals (lead and copper) and legionella in the Lower Level and First Floor to comply with GSA Drinking Water Policy and CDC Guidance. Following is a summary table.

Analyte	Acceptable Level	Regulatory Basis	985 Levels	Comments
Total Coliforms (including fecal coliform and E. Coli)	No more than 5.0% samples total coliform-positive (TC-positive) in a month.	US Primary Drinking Water Standards as incorporated in the GSA Drinking Water Policy.	Absent in all representative samples.	Demonstrates that the water distribution system is not impacted by distribution breaks or general bacteria.
Lead	Action Level=0.015, mg/L	US Primary Drinking Water Standards as incorporated in the GSA Drinking Water Policy.	Maximum level is 0.0057 mg/L in representative samples.	Demonstrates compliance with the GSA Drinking Water Policy.
Copper	Action Level=1.3 mg/L	US Primary Drinking Water Standards as incorporated in the GSA Drinking Water Policy.	Maximum level is 3.2 mg/L in representative samples.	Alternative drinking water is supplied until confirmation is complete. EPA guidance establishes that levels found remain acceptable for handwashing.
Legionella	Less than or equal to 0.9 CFU/mL in potable water and 9 CFU/mL in non-potable water	CDC Guidance for Well Controlled Conditions	Non-detectable for cooling towers (non-potable). Non-detectable in all locations tested for potable water.	Filters are effective in controlling exposure to legionella at potable water locations tested. Alternative drinking water is supplied until confirmation is complete. Cooling tower maintenance program is effective in controlling legionella.

GSA has also tested the alternative source of drinking water (bottled water for water coolers) being supplied at the facility and results are non-detectable for total coliforms, e. Coli and legionella, and are below both detection limits and action levels for lead and copper. GSA is meeting the criteria established by policy and shared with tenants in protecting tenants from exposure to total coliforms and E. coli, lead, copper and legionella.



Additional Actions for Safe Occupancy

Concerns regarding indoor air quality have been addressed through additional actions including inspection for mold and mold conditions notably in the shaft adjacent to IRS print shop space that were negative. Air handling equipment serving the Lower Level and First Floor have been inspected as part of scheduled maintenance and MERV 13 filters are in place. MERV 13 filters are effective for sneeze-droplets, most bacteria including legionella, mold spores and dust mites.

Tenant spaces have been cleaned and inspected including non-standard cleaning of ventilation vent covers.

Alternative drinking water (five-gallon water jugs and dispensers) are located conveniently in tenant spaces while GSA continues to perform confirmation testing.

Filters used to control legionella in the facility will be replaced following manufacturer's guidance along with monitoring of declining flow rate indicating that the filter is approaching capacity. Note that filter capacity declines prior to filter effectiveness.

GSA has worked with its consultant IWC in establishing a Water Management Plan for the facility that establishes safe operation of the water systems in the building. The Water Management Plan establishes operating parameters, testing and analysis frequency and subsequent response actions if required. This plan is being refined as corrective actions continue.

Corrective Actions

GSA has contracted a forensic engineering firm through its drinking water consultant IWC, to continue to investigate and address the contributing factors to the drinking water concerns in the 985 Michigan Federal Building. This includes correct operations of water circulation loops, replacement of compromised hot water heaters and additional plumbing features to improve flushing. The plumbing system will be evaluated for dead legs and cathodic isolation of materials. These actions are intended to create and maintain quality drinking water throughout the facility, allowing for the eventual removal of the existing mitigation factors currently in place. (e.g., point-of-use filters, alternative drinking water sources).