



June 13, 2007

Mr. Thomas Ratliff, Project Manager
Grunley Construction
15020 Shady Grove Road, Suite 500
Rockville, MD 20850

Re: GS11P01MAC0540, Department of the Interior Headquarters Building Modernization

SUBJ: NIOSH RECOMMENDATIONS FOR MODERNIZATION PROJECT

Dear Mr. Ratliff:

As you are aware, there has been a long history of tenant complaints about indoor air quality (IAQ) at the Department of the Interior (DOI) as it relates to the Modernization project. As part of an ongoing effort to bring in national experts to help identify potential contributors to this problem and to help identify corrective measures, DOI invited the National Institute for Occupational Safety and Health (NIOSH) in to perform a site visit of the Modernization project. This site visit took place August 14-16, 2006. DOI received the final report from their site visit dated May 24, 2007. Grunley has previously been provided a copy of the subject final report. It is also available online at the DOI Modernization website.

The purpose of the site visit was to provide recommendations to DOI on resolving indoor environmental quality (IEQ) problems associated with the Modernization project. In that effort, the main focus was to review Grunley Construction's adherence to the publication "SMACNA: IAQ Guidelines for Occupied Buildings Under Construction". The focus on this publication was due to Grunley's indication of meeting or exceeding this publications requirements and recommendations as part of Grunley's Construction Indoor Air Quality (IAQ) Management Plan. Following the verbal debrief from NIOSH, GSA provided a list of immediate actions to be taken by Grunley to adhere to the guidelines. Grunley implemented direct requirements and provided a temporary increased effort on more subjective requirements. What is now needed is a thorough review of where we are and how do we get the project to improve upon prior initiatives for better overall IAQ as it relates to the Modernization project.

NIOSH outlined 10 recommendations for improvement. Eight of these recommendations are directly related to Grunley's management of the project.

- 1.) Negative pressurization ("negative air"): While fans were installed to try and mechanically exhaust more air than was being mechanically drawn into the construction spaces for your heating plan, these do not appear to be providing enough exhaust to provide negative air within the construction spaces. On August 25, 2006 Grunley indicated "If necessary, small exhaust fans will be placed in window openings in rooms adjacent to occupied space in order to improve negative pressure in the construction

space.” This has not been accomplished. GSA requests that Grunley install the additional fans as previously indicated. Since Grunley has verbally indicated several obstacles to achieving negative pressure in the construction spaces, it appears Grunley has ample knowledge on how to achieve negative pressure relative to the occupied space. Please provide a plan on how Grunley intends to maximize success for achieving negative pressure in the construction space and how Grunley intends to measure the pressure to ensure they are achieving negative air.


- 2.) Implementation of SMACNA Guidelines: Please indicate how Grunley is ensuring they are implementing SMACNA guidelines as part of their project management plan.
- 3.) Designated Persons: SMACNA recommends designation of individuals knowledgeable in the practice of IEQ from each entity in the construction process. Additional recommendations are for developing checklists to be developed and used by “designated persons to evaluate measurable aspects of conformity with the SMACNA guidelines.” Please indicate who the Grunley representative will be and also please provide a checklist to be utilized on a regular basis by the individual (or another appropriate designated representative) for ensuring compliance.
- 4.) Communication: This item is primarily directed at DOI. However, there are several areas that describe training and recurring emphasis of IAQ controls for contractor and subcontractor personnel. Grunley indicated on August 25, 2006 that “(t)o enhance training and awareness, the IAQ topic, i.e. dust and odor control methods, will be discussed at each subcontractor and staff meeting.” Please address whether this practice is still ongoing and if so to what degree. Copies of any agenda’s or training handouts would be helpful.
- 5.) Construction walls and barricades: These were addressed while NIOSH was still on site. Grunley had a designated person for inspecting and correcting any noted deficiencies in barriers. This maintenance has fallen off track. This is an item that should be part of a regular checklist for ensuring barricades are being properly maintained.
- 6.) Housekeeping: Grunley has increased their housekeeping outside of the construction barriers but could use improvement inside the barriers. Please provide documentation on the cleaning plan currently in use outside of the barriers and for the walk off mats inside the barriers. As part of your response, please provide any practices in use within the construction space to minimize dirt/dust accumulation in accordance with part 3.5 Housekeeping in the SMACNA guidelines.
- 7.) Traffic into and out of construction areas: This issue will be properly addressed with the response to #6 above.
- 8.) Rubbish removal from the construction area: Two recommendations have been made; (1) limiting dust release from trash chutes by tarping & (2) not moving rubbish loads through corridors and hallways. Please indicate any actions Grunley is taking or plans on taking as it relates to rubbish removal from the construction area.
- 9.) Heating, ventilating and air-conditioning (HVAC) systems: Daily inspections as part of the checklist referenced in #3 should address this item.
- 10.) Risk communication for building occupants: This item is directed at DOI.

While GSA is requesting the above information from Grunley, GSA is also working with DOI on determining what recommendations from the SMACNA guidelines can be pursued by the DOI facilities group.

While we understand that some issues will take more time to review and respond to than others, please provide an initial response to as many of the requests above by Wednesday June 20, 2007. When providing your initial response, please identify which items are not being addressed and a date for a full response to the issue.

If you have any questions, please do not hesitate to contact me at 202.834.6545 or at robert.vaughn@gsa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "R. C. Vaughn". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

R. C. "Skip" Vaughn
Senior Project Manager
General Services Administration