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Occupational Safety & Health Points of Contact

OSH Bureau and Agency Point of Contact

William Fleming
Designated Agency Safety and Health Official

Office of Occupational Safety and Health

Main telephone number: 202-482-4935

Fax number: 202-482-4075

Nancy McWilliams, CSP, ARM, Director HCHB, 14 th & Penn Avenue Washington, DC 20230 (202) 482-4935 nmcwilliams@doc.gov	Richard Denny, CSP, Safety Specialist HCHB, 14 th & Penn Avenue Washington, DC 20230 (202) 482-1990 rdenny@doc.gov
Stewart Merritts, Safety Specialist HCHB, 14 th & Penn Avenue Washington, DC 20230 (202) 482-	Douglas Shjeflo, Workers Compensation Manager HCHB, 14 th & Penn Avenue Washington, DC 20230 (202) 482-2968 dshjeflo@doc.gov
Sandra Williams, Workers Compensation Specialist HCHB, 14 th & Penn Avenue Washington, DC 20230 (202) 482-0799 swilliams@doc.gov	

Bureau and Organization Safety Manager's / Coordinator's Listing

OS Richard Denny, CSP, Safety Specialist HCHB, 14 th & Penn Avenue Washington, DC 20230 (202) 482-1990 rdenny@doc.gov	NTIA Anthony Calza HCHB, 14 th & Penn Avenue Washington, DC 20230 (202) 482-2196 acaiza@ntia.doc.gov
ITA Jeff Scherr HCHB, 14 th & Penn Avenue Washington, DC 20230 (202) 482-3266 Jeffrey.Scherr@trade.gov	NTIS Jill Johnson 5185 Port Royal Road Springfield, VA 22161 (703) 605-6401 jjohnson@ntis.gov
ESA Pamela Moulder HCHB, 14 th & Penn Avenue Washington, DC 20230 (202) 482-5997 pamela.moulder@esa.doc.gov	EDA Tanika Hawkins HCH, 14 th & Penn Avenue Washington, DC 20230 (202) 482-2066 THawkins@eda.doc.gov

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OIG Ann Carper HCHB, 14 th & Penn Avenue Washington, D.C. 20230 (202) 482-6316 acarper@oig.doc.gov	PTO Carol Barnhill 551 John Carlyle Street Alexandria, VA 22314 (571) 272-6342 carol.barnhill@uspto.gov
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BIS Monica Hudnell HCHB, 14 th & Penn Avenue Washington, DC 20230 (202) 482-6118 mhudnell@bis.doc.gov	NOAA George Middleton HQ/OA341 Silver Spring, MD 20910 (301) 713-2870 Ext. 102 George.Middleton@noaa.gov
MBDA Wendy Echeverria HCHB, 14 th & Penn Avenue Washington, D.C. 20230 (202) 482-2219 wecheverria@mbda.gov	NIST Rosamond Rutledge-Burns 100 Bureau Drive, Stop 354 Gaithersburg, MD 20899 (301) 975-5818/5819 rosamond.burns@nist.gov
OAS Vacant HCHB, 14 th & Penn Avenue Washington, DC 20230	

Bureau and Organization Workers' Compensation Coordinator's Listing

OS Sandra Williams, Workers Compensation Specialist HCHB, 14 th & Penn Avenue Washington, DC 20230 (202) 482-0799 swilliams@doc.gov	NTIA Anthony Calza HCHB, 14 th & Penn Avenue Washington, DC 20230 (202) 482-2196 acalza@ntia.doc.gov
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OIG Angela Singmore HCHB, 14 th & Penn Avenue Washington, D.C. 20230 (202) 482-0912 asingmore@oig.doc.gov	PTO Leslie Warner 551 John Carlyle Street Alexandria, VA 22314 (571) 272-6142 Leslie.Warner@uspto.gov
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OAS Vacant HCHB, 14 th & Penn Avenue Washington, DC 20230	

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OHRM Contacts by HR Program (Functional Listing)

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Functional Contact Listing within the Office of Human Resources Management

ABCDEFGHIJKLMNOPQRSTUVWXYZ

Function	Office	Primary Person Responsibility	Phone Number	Backup	Phone Number
A					
A-76/FAIR Act Inventory	DIR	Main Office	482-4807		
Accident/Injury Investigations	OOSH	Richard Denny	482-1990	Richard Denny	482-1990
Accountability Reporting Accountability/Oversight Reviews	OCHCS & IS	Patrick Coates	482-7964	Ann Wells	482-6315
Administration Professional Certificate Program	OTKM	Julia Law	482-8095	Linda Snow	482-0876
Adopt-a-School Program					
Adoption Benefits	OPP	Nicho Pruett	482-3506		
Administrative Grievance System Policy	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Administrative Officer	DIR	JoAnne Fowler	482-2650		
Advances in Pay	OPP	Valerie Smith	482-0272	Nicho Pruett	482-3506
Adverse & Disciplinary Actions Policy	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Agency Head Review	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Aliens (Employment)	OPP	Valerie Smith	482-0272	Sabra Street	482-4270
Alternative Dispute Resolution	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068

Alternate Work Schedules	OPP	Valerie Smith	482-0272	Nicho Pruett	482-3506
Annual Report to OSHA	OOSH	Nancy McWilliams	482-4935	Richard Denny	482-1990
Asbestos Issues	OOSH	Richard Denny	482-1990	Nancy McWilliams	482-4935
Aspiring Leaders Development Program	OTKM	Julia Law	482-8095	Michael Cohen	482-1750
Automated Classification System (ACS)	OPP	Nicho Pruett	482-3506		
Automated Hiring System (MGS)	OPP	Sabra Street	482-4270	Valerie Smith	482-0272
Awards	OPP	Michael Osver	482-3919	Sabra Street	482-4270
B					
Bargaining Unit Status	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Benefits	OPP	Nicho Pruett	482-3506		
Buyouts	OPP	Sabra Street	482-4270	Valerie Smith	482-0272
Budget (OHRM)	DIR	Millita Robinson	482-8361		
C					
Career Transition Assistance Programs (CTAP/ICTAP)	OPP	Farhan Qureshy	482-0149	Sabra Street	482-4270
CFO 5-Yr. Plan	DIR	Main Office	482-4807		
CFO IT/Obligation	DIR	Main Office	482-4807		
CFO Performance Appraisal Input	OPP	Michael Osver	482-3982	Sabra Street	482-4270
Child Support Payments	OPP	James Hoebel	482-5372	Marie Waters	482-0056
Citizenship	OPP	Valerie Smith	482-0272	Farhan Qureshy	482-0149
Classification	OPP	Nicho Pruett	482-3506	Farhan Qureshy	482-0149
Collective Bargaining Unit	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068

Commerce Alternative Personnel System-NFC	OPP	James Hoebel	482-6372	Marie Waters	482-0056
Commerce Alternative Personnel System (CAPS)	OPP	Valerie Smith	482-0272	Pamela Boyland	482-1068
Compensation	OPP	Pamela Boyland	482-1068	Nicho Pruett	482-3506
COOP	OOSH	Nancy McWilliams	482-4935	Richard Denny	482-1990
Cooperative Education Employment	OPP	Farhan Qureshy	482-0149	Sabra Street	482-4270
CPR Training	OOSH	Richard Denny	482-1990	Nancy McWilliams	482-4935
D					
Debt Collections	OPP	James Hoebel	482-6372	Pamela Boyland	482-1068
Delegated Examining Unit	OPP	Sabra Street	482-4270	Farhan Qureshy	482-0149
Delegations of Authority	OPP	Sabra Street	482-4270	Farhan Qureshy	482-0149
Department Administrative Orders (DAO)	OPP	Pamela Boyland	482-1068	Frank Milman	482-3321
Department Administrative Orders (DAO) Training 202-410 & 202-412	OTKM	Fred Lang	482-6302	Peggy Leung	482-1847
Department Organization Orders (DOO)	OPP OER	Pamela Boyland (OPP) Denise Yaag (OER)	482-1068 482-3600	Frank Milman	482-3321
Departmental Reports	OCHCS&IS	Valerie Revelez	482-4425	Melissa Herrera	482-4035
Details - GS	OPP	Farhan Qureshy	482-0149	Sabra Street	482-4270
Disability Retirement	OPP	Nicho Pruett	482-3506		
Displaced Employee Program	OPP	Sabra Street	482-4270	Farhan Qureshy	482-0149
Diversity Outreach	OCHCS&IS	Valerie Revelez	482-4425	Melissa Herrera	482-4035
DOC Safety & Health Council	OOSH	Main Office	482-4935	Nancy McWilliams	482-4935
DOC Safety & Health Manual	OOSH	Nancy McWilliams	482-4935	Richard Denny	482-1990

Drug Free Workplace	OPP	Frank Milman	482-3321		
Dual Pay and Employment	OPP	Valerie Smith	482-0272	Sabra Street	482-4270
Dues Withholding (Union)	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
E					
EARN/NFC	OPP	James Hoebel	482-6372	Marie Waters	482-0056
E-Recruiting	OCHCS&IS	Valerie Revelez	482-4425	Melissa Herrera	482-4035
E-Learning	OTKM	Peggy Leung	482-1847	Fred Lang	482-6302
E-HR Payroll	OPP	James Hoebel	482-6372		
EHRI (Electronic Personnel Files, E-OPF) Enterprise HR Integration	OPP	James Hoebel	482-6372	Marie Waters	482-0056
E-Verify	OPP	James Hoebel	482-6372	Marie Waters	482-0056
Elder Care	OPP	Nicho Pruett	482-3506		
Emergency (Essential) Designations	OPP	Pamela Boyland	482-1068	Valerie Smith	482-0272
Emergency Plan (Occupant)	OOSH	Main Office	482-4935	Nancy McWilliams	482-4935
Employee Assistance Program	OPP	Pamela Boyland	482-1068		
Employee Benefits Program (General)	OPP	Nicho Pruett	482-3506		
Employee Development (Policy)	OTKM	Peggy Leung	482-1847	Fred Lang	482-6302
Employee Data Analysis	OPM&IT	Bradford Lockett	482-6342	Diane Evans	482-4382
Employee Handbook					
Employee Recognition	OPP	Michael Osver	482-3919	Sabra Street	482-4270
Employee Relations	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
EPIC/NFC	OPP	James Hoebel	482-6372	Marie Waters	482-0056

Employment (General)	OPP	Valerie Smith	482-0272	Sabra Street	482-4270
Employment (non-citizens /aliens)	OPP	Valerie Smith	482-0272	Sabra Street	482-4270
Ethics	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Excepted Service	OPP	Valerie Smith	482-0272	Farhan Qureshy	482-0149
Executive Leadership Development Program	OTKM	Rhonda Carney	482-2814	Michael Cohen	482-1750
Executive Education Program	OTKM	Peggy Leung	482-1847	Fred Lang	482-6302
Executive Resources Information Systems (ERIS)	OER	Lorraine Shackelford	482-8071	Bradford Lockett	482-4382
Exhibit 300	OPM&IT	Esteve Mede	482-3820		
Experts and Consultants	OPP	Sabra Street	482-4270	Farhan Qureshy	482-0149
F					
FAIR Act/A-76 Inventory	DIR	Millita Robinson	482-8361		
Fair Labor Standards Act	OPP	Frank Milman	482-3321		
Family Medical Leave	OPP	Nicho Pruett	482-3506		
Federal Executive Institute	OTKM	Julia Law	482-8095	Linda Snow	482-0876
Federal Wage System (Classification)	OPP	Nicho Pruett	482-3506	Farhan Qureshy	482-0149
Federal Wage System (Pay)	OPP	Valerie Smith	482-0272	Nicho Pruett	482-3506
Federal Employees Dental and Vision Insurance Program (FEDVIP)	OPP	Nicho Pruett	482-3506		
Federal Employees Group Life Insurance (FEGLI)	OPP	Nicho Pruett	482-3506		
Federal Employees Health Benefits (FEHB)	OPP	Nicho Pruett	482-3506		
Federal Long Term Care Insurance Program (FLTCIP)	OPP	Nicho Pruett	482-3506		
FEORP	OCHCS&IS	Valerie Revelez	482-4425	Melissa Herrera	482-4035

Financial Disclosure	OPP	Farhan Qureshy	482-0149	Valerie Smith	482-0272
Financial Integrity	OPP	Frank Milman	482-3321	Farhan Qureshy	482-0149
FSA Feds (Flexible Spending Accounts)	OPP	Nicho Pruett	482-3506		
Foreign Gifts and Honors	OPP	Michael Osver	482-3919		
Foreign Service	OPP	Valerie Smith	482-0272	Sabra Street	482-4270
Furlough	OPP	Frank Milman	482-3321	Valerie Smith	482-0272
G					
Goalsharing	OPP	Michael Osver	482-3919		
General Schedule (Classification)	OPP	Nicho Pruett	482-3506	Farhan Qureshy	482-0149
General Schedule (Pay)	OPP	Valerie Smith	482-0272	Pamela Boyland	482-1068
Grievances, Employee	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
GWF Performance Appraisal	OPP	Michael Osver	482-3919	Sabra Street	482-4270
GPRA	OCHCS&IS	Valerie Revelez	482-4425	Melissa Herrera	482-4035
H					
Health Benefits	OPP	Nicho Pruett	482-3506		
HCHB Health Unit	OOSH	Richard Denny	482-1990	Nancy McWilliams	482-4935
Hiring Flexibilities and Management	OPP	Valerie Smith	482-0272	Sabra Street	482-4270
Hiring Management Systems	OPP	Sabra Street	482-4270	Valerie Smith	482-0272
Hispanic Employment Plan	OCHCS&IS	Valerie Revelez	482-4425	Melissa Herrera	482-4035
Homeland Security Presidential Directive 12 (HSPD-12)	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Honor Awards	OPP	Michael Osver	482-3919		

Hours of Duty	OPP	Valerie Smith	482-0272	Pamela Boyland	482-1068
Hours of Work (Scheduling)	OPP	Valerie Smith	482-0272	Pamela Boyland	482-1068
HR Lines of Business / Multi-agency Executive Strategy Committee (HRLOB/MAESC)	OPP	Valerie Smith	482-0272	Farhan Qureshy	482-0149
HR Web Systems/Apps	OPM&ITO	Lorraine Shackelford	482-8071		
I					
Immigration Waivers (J-1 Waivers)	OPP	Frank Milman	482-3321	Valerie Smith	482-0272
Incentive Awards	OPP	Michael Osver	482-3919		
Indebtedness	OPP	Frank Milman	482-3321	James Hoebel	482-6372
Individual Learning Accounts Pilot					
Indoor Air Quality	OOSH	Main Office	482-4935		
INDUS-COTR	OPM&ITO	Lorraine Shackelford	482-8071		
Injury Compensation	OOSH	Doug Shjeflo	482-2968	Sandra Williams	482-4935
Intergovernmental Personnel Act (IPA)	OPP	Farhan Qureshy	482-0149	Sabra Street	482-4270
IT Security	OPM&ITO	Esteve Mede	482-3820		
J					
K					
L					
Labor Management Forums	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Labor Management Relations	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Labor Organizations (Unions)	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Law Enforcement Positions	OPP	Nicho Pruett	482-3506	Valerie Smith	482-0272

Lead Paint Issues	OOSH	Main Office	482-4935	Richard Denny	482-1990
Learning Management System (LMS)	OTKM	Peggy Leung	482-1847	Fred Lang	482-6302
Leave Policy	OPP	Valerie Smith	482-0272	Pamela Boyland	482-1068
Leave Transfer Program	OPP	Valerie Smith	482-0272	Nicho Pruett	482-3506
Life Insurance	OPP	Nicho Pruett	482-3506		
Long Term Care (Federal)	OPP	Nicho Pruett	482-3506		
M					
Management Rights	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Medical Fitness for Duty	OPP	Valerie Smith	482-0272	Sabra Street	482-4270
Medical Qualifications Standards	OPP	Valerie Smith	482-0272	Sabra Street	482-4270
Merit Assignment Plan	OPP	Valerie Smith	482-0272	Sabra Street	482-4270
Merit Principles	OPP	Valerie Smith	482-0272	Sabra Street	482-4270
Minority Serving Institutions (MSI) -OS Program	OCHCS&IS	Valerie Revelez	482-4425	Melissa Herrera	482-4035
N					
National Academy Foundation (NAF)	OCHCS&IS	Melissa Herrera	482-4035	Valerie Revelez	482-4425
National Consultation Rights	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Negotiated Grievance Procedures	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Nepotism	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
NFC Connections	OPP	James Hoebel	482-6372	Marie Waters	482-0056
NFC CRS Interface	OPP	James Hoebel	482-6372	Marie Waters	482-0056
NFC E&L Statements	OPP	Marie Waters	482-0056	James Hoebel	482-6372

NFC IT Applications Policy	OPP	James Hoebel	482-6372	Marie Waters	482-0056
NFC Liaison	OPP	James Hoebel	482-6372	Marie Waters	482-0056
NFC/NOAA Printing	OPP	James Hoebel	482-6372	Marie Waters	482-0056
NFC Reporting Center	OPM&ITO	Lorraine Shackelford	482-8071		
NFC Security	OPP	Marie Waters	482-0056	James Hoebel	482-6372
Non-Citizen Employment	OPP	Valerie Smith	482-0272	Sabra Street	482-4270
O					
Occupational Health	OOSH	Main Office	482-4935		
(OHRM) IT Plan	OPM&ITO	Aftab Bukhari	482-0537		
(OHRM) Web Site Maintenance	OPM&IT	Brad Lockett	482-6342	Lorraine Shackelford	482-8071
OPM's Installation Assessment Visits	OPP	Pamela Boyland	482-1068	Frank Milman	482-3321
OPM Reporting (113A & 113G)	OPP	Marie Waters	482-0056	James Hoebel	482-6372
Outstanding Scholar Program	OPP	Sabra Street	482-4270	Farhan Qureshy	482-0149
Overpayments	OPP	James Hoebel	482-6372	Farhan Qureshy	482-0149
Overseas Allowances and Differentials	OPP	Valerie Smith	482-0272	James Hoebel	482-6372
Overseas Employment	OPP	Sabra Street	482-4270	Valerie Smith	482-0272
P					
Partnership	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Part-time Employment	OPP	Valerie Smith	482-0272	Sabra Street	482-4270
Pay Policy	OPP	Valerie Smith	482-0272	Pamela Boyland	482-1068
Payroll Operations Procedures	OPP	James Hoebel	482-6372		
Performance - 360	OPP	Michael Osver			

			482-3919		
Performance Based Actions	OPP	Michael Osver	482-3919		
Performance Management	OPP	Michael Osver	482-3919		
Performance Measurement (HR)	OCHCS&IS	Valerie Revelez	482-4425	Melissa Herrera	482-4035
Performance Payout System (PPS) - CAPS	OPP	Valerie Smith	482-0272	Sabra Street	482-4270
Picketing (Union)	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Political Activities (Hatch Act)	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Position Description	OPP	Nicho Pruett	482-3506	Farhan Qureshy	482-0149
Position Sensitivity	OPP	Nicho Pruett	482-3506	Farhan Qureshy	482-0149
Postsecondary Grants Internship Program	OCHCS&IS	Valerie Revelez	482-4425	Melissa Herrera	482-4035
Presidential Appointments	OER	Denise Yaag	482-3600	Terri Lucente	482-1630
Presidential Management Fellows	OCHCS&IS	Ann Wells	482-6315		
Presidential Rank Awards	OER	Terri Lucente	482-1630		
Presidential Transition	OER	Denise Yaag	482-3600		
Privacy Act	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Probationary Period for Mgrs/Supervisors	OPP	Valerie Smith	482-0272	Sabra Street	482-4270
Probationary Separation	OPP	Frank Milman	482-3321	Valerie Smith	482-0272
Prohibited Practices	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Professional Liability Insurance	OPP	Nicho Pruett	482-3506	Frank Milman	482-3321
Property Accountability Officer	DIR	JoAnne Fowler	482-2650		
Q					

Qualification Standards (non-medical)	OPP	Valerie Smith	482-0272	Farhan Qureshy	482-0149
R					
Reasonable Accommodations	OPP	Sean Lenahan	482-0767	Valerie Smith	482-0272
Recruitment	OCHCS&IS	Valerie Revelez	482-4425	Melissa Herrera	482-4035
Reemployment Rights	OPP	Sabra Street	482-4270	Valerie Smith	482-0272
Relatives, Employment of	OPP	Farhan Qureshy	482-0149	Sabra Street	482-4270
Representation Rights and Duties	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Retirement	OPP	Nicho Pruett	482-3506		
Reduction-in-force (RIF)	OPP	Frank Milman	482-3321	Valerie Smith	482-0272
S					
Safety	OOSH	Main Office	482-4935		
Savings Bonds	OPP	James Hoebel	482-6372	Marie Waters	482-0056
Schedule C Appointments	OER	Jordan Andrews	482-5815	Denise Yaag	482-3600
Selection Procedures	OPP	Farhan Qureshy	482-0149	Sabra Street	482-4270
Selective Placement	OPP	Sabra Street	482-4270	Farhan Qureshy	482-0149
Senior Executive Service	OER	Denise Yaag	482-3600	Terri Lucente	482-1630
SES Bonuses	OER	Terri Lucente	482-1630	Denise Yaag	482-3600
SES Candidate Development Program	OTKM	Fred Lang	482-6302	Peggy Leung	482-1847
SES PMS Certification	OER	Terri Lucente	482-1630		
SES Mobility	OER	Terri Lucente	482-1630		
SES Performance Management (Policy)	OER	Terri Lucente	482-1630	Denise Yaag	482-3600
SES Noncareers (Politicals)	OER	Denise Yaag		Terri Lucente	

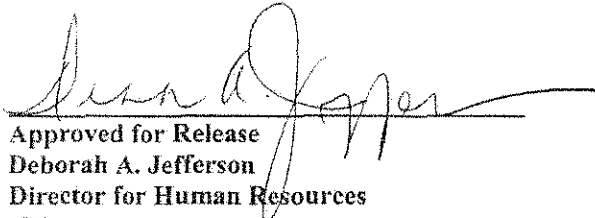
			482-3600		482-1630
Senior Professionals	OER	Terri Lucente	482-1630	Kathleen Koral	482-1671
Severance Pay	OPP	Valerie Smith	482-0272	Pamela Boyland	482-1068
Smoking Policy	OOSH	Main Office	482-4935		
Special Salary Rates	OPP	Valerie Smith	482-0272		
ST/SL PMS Certification	OER	Terri Lucente	482-1630		
Staffing	OPP	Valerie Smith	482-0272	Sabra Street	482-4270
Staffing Timeliness Measures System	OPP	Valerie Smith	482-0272	Sabra Street	482-4270
Staffing Timeliness Measures	OCHCS&IS	Valerie Revelez	482-4425	Melissa Herrera	482-4035
Strategic Human Capital Management	OCHCS&IS	Valerie Revelez	482-4425	Melissa Herrera	482-4035
Strikes	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Student Employment Policy (SCEP, STEP)	OPP	Sabra Street	482-4270	Farhan Qureshy	482-0149
Student Loan Repayments	OPP	Sabra Street	482-4270	Farhan Qureshy	482-0149
Student Volunteers	OPP	Sabra Street	482-4270	Farhan Qureshy	482-0149
Succession Planning	OER	Main Office	482-5967		
Suggestion Program	OPP	Michael Osver	482-3919		
Suitability	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068

Summer (Student) Employment	OPP	Farhan Qureshy	482-0149	Sabra Street	482-4270
Superior Qualifications Appointment	OPP	Farhan Qureshy	482-0149	Sabra Street	482-4270
Supervisory Training	DOCROC	Anesia Robinson	482-1380		
T					

T&A Policy	OPP	Valerie Smith	482-0272	Pamela Boyland	482-1068
Telework	OPP	Pamela Boyland	482-1068	Valerie Smith	482-0272
Term Promotion	OPP	Farhan Qureshy	482-0149	Valerie Smith	482-0272
Term/Temporary Employment	OPP	Farhan Qureshy	482-0149	Valerie Smith	482-0272
The Work Number	OPP	Marie Waters	482-0056	Jim Hoebel	482-6372
Thrift Savings Plan	OPP	Nicho Pruett	482-3506		
Time-in-Grade	OPP	Valerie Smith	482-0272	Farhan Qureshy	482-0149
Time and Attendance	OPP	Jim Hoebel	482-6372	Nicho Pruett	482-3506
Training Policy	OTKM	Peggy Leung	482-1847	Fred Lang	482-6302
U					
Unemployment Compensation	OPP	Jim Hoebel	482-6372	Marie Waters	482-0056
Unfair Labor Practices	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
V					
Veterans Employment	OPP	Sean Lenahan	482-0767	Valerie Smith	482-0272
Veterans Preference	OPP	Sabra Street	482-4270	Farhan Qureshy	482-0149
Violence in the Workplace	OPP	Frank Milman	482-3321	Pamela Boyland	482-1068
Volunteer Community Service Program					
Voluntary Employee Organizations	OPP	Sabra Street	482-4270	Farhan Qureshy	482-0149
Voluntary Early Retirement Authority (VERA)	OPP	Sabra Street	482-4270	Valerie Smith	482-0272
Voluntary Separation Incentive Pay (VSIP)	OPP	Sabra Street	482-4270	Valerie Smith	482-0272
Voters Assistance Program	OPP	Valerie Smith	482-0272	Sabra Street	482-4270

W					
Wage Marine Payments	OPP	Valerie Smith	482-0272	Pamela Boyland	482-1068
WEBTA	OPP	Jim Hoebel	482-6372	Valerie Smith	482-0272
Web Master - OHRM	OPM&IT	Bradford Lockett	482-6342	Lorraine Shackelford	482-8071
Within Grade Denial	OPP	Frank Milman	482-3321	Valerie Smith	482-0272
Work and Family Programs	OPP	Pamela Boyland	482-1068	Valerie Smith	482-0272
Workers' Compensation	OOSH	Doug Shjeflo	482-2968	Sandra Williams	482-4935
Workforce Planning	OCHCS&IS	Valerie Revelez	482-4425	Melissa Herrera	482-4035
X, Y, Z					

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Approved for Release
Deborah A. Jefferson
Director for Human Resources
Management

10-18-05
Date

**DEPARTMENT OF COMMERCE
OFFICE OF HUMAN RESOURCES MANAGEMENT**

HUMAN RESOURCES (HR) BULLETIN # 017, FY06, 29 CFR 1904.39

SUBJECT: Reporting of Occupational Injuries and Illnesses, Fatalities, Property Damage, and Hazardous Materials Releases

EFFECTIVE DATE: Upon release of this Human Resources (HR) Bulletin

EXPIRATION DATE: October 1, 2005

MODIFIES: Department Administrative Order (DAO) 209.3 Injury, Illness, Accident, and Fatality Investigation and Reporting and U. S. Department of Commerce Occupational Safety and Health Manual, Chapter 11 Incident Investigation, Reporting, and Recordkeeping

BACKGROUND: The Department must be informed of all incidents involving Department employees and property, regardless of extent or severity. To accomplish this, timely and accurate incident reporting from all bureaus and operating units is required.

PURPOSE: The purpose of this HR Bulletin is to improve incident reporting by requiring reports for hazardous materials incidents and removing all threshold levels for reporting.

APPLICABILITY: This HR Bulletin applies to all Department bureaus, agencies, offices, operating units, and other components.

CHANGES: All incidents involving injuries, occupational illnesses, fatalities, property damage, and hazardous material releases must be reported to the Director of the Office of Occupational Safety and Health regardless of severity, damage or hazardous material release amount. There are no thresholds for reporting requirements.

PROCEDURES: The Department official responsible for the injured employee(s), damaged property, or hazardous material shall report the incident by the quickest method available to the appropriate Safety Representative who shall inform the Director of the

Office of Occupational Safety and Health immediately upon receipt of the notification. The report shall use Form CD 137. Detailed additional information shall be appended. Additional information for incidents involving property damage, fire or hazardous materials release shall include:

Incident Type	Incident Type Specific Required Information	Required for All Incidents
Property Damage	<ul style="list-style-type: none"> • Cause of damage • Actions taken to limit, control or prevent damage 	<ul style="list-style-type: none"> • Detailed site/location description • Detailed description of damage • Estimated extent of incident (e.g., dollars, rooms, square feet, gallons) • No. of employees involved • Contractors involved to include number of employees involved • Impact on the general public (e.g., number exposed, community impact, public property damaged) • Time and date of notification to Safety Representative
Fire	<ul style="list-style-type: none"> • Cause of fire or source of ignition • Firefighter employer (e.g., DOC bureau, municipal, county, volunteer) • Firefighting Methods • Summary of fire fighting events and actions 	
Hazardous Materials Release	<ul style="list-style-type: none"> • Cause of the release • Handler of materials at the time of release to include organization or company and individuals • Materials released • Amount of each released material 	

REFERENCES: 29 CFR 1904.39, U. S. Department of Commerce Occupational Safety and Health Manual, Chapter 11 Incident Investigation, Reporting, and Recordkeeping, DAO 209.3 Injury, Illness, Accident, and Fatality Investigation and Reporting

OFFICE OF OCCUPATIONAL SAFETY AND HEALTH: Fred Fanning, Director, ffanning@doc.gov, 202-482-0211

**SECO**

Environmental Compliance Office

[Home](#) -- [Safety](#) -- [Environmental](#)**General Counsel of the United States Department of
Commerce Washington, D.C. 20230 May 10, 1989**

MEMORANDUM Hugh Brennan
FOR: Director, Procurement and Administrative
 Services

FROM: Marilyn G. Wagner
 Assistant General Counsel for Administration

SUBJECT: Liability of Federal Employees for Violating
 Environmental Laws

This is a preliminary response to the request for an opinion on the potential liability of Commerce employees in light of the recent criminal convictions under the Resources Conservation and Recovery Act (RCRA) 42 U.S.C. 6961 (1982) of federal employees at the Aberdeen Proving Grounds in Maryland. As a result of this request, a member of my staff attended a presentation at the Environmental Protection Agency (EPA) by one of the prosecuting Assistant U.S. Attorneys in the Aberdeen case. Individuals from the Office of Administrative Services Management and the Environmental Compliance Division were also in attendance. At this meeting, it was agreed that an expedited preliminary response would be limited to the implications of the Aberdeen case for violations under RCRA, and that a more detailed response would subsequently be developed to address potential civil and criminal liability under RCRA, as well as other federal and state environmental laws.

At the time of this writing, the federal managers in the Aberdeen case had been convicted in their personal capacities by a jury for knowingly storing and disposing of hazardous wastes without the required RCRA permit. *The sentencing of those individuals is now scheduled for May 11, 1989. Under RCRA those individuals could be sentenced to a maximum of 5 years in prison and fined \$250,000 per violation. 42 U.S.C. 6928 (d). RCRA also provides more stringent penalties for more culpable violations in which an individual knowingly endangers others. 42 U.S.C. 6928 (e).

In the presentation by the Assistant U.S. Attorney Jane Barrett, it was explained how the Justice Department decided to prosecute the individuals in this Aberdeen case. She emphasized that the substances stored and disposed were extremely hazardous chemicals used for developing chemical warfare munitions. The federal managers charged in that case were found culpable because they failed to take any actions to remedy problems resulting from noncompliance with RCRA after receiving several warnings from various sources. These individuals testified that "environmental safety was not a priority" within their program objectives. They indicated that because of budgetary concerns

they did not notify their superiors of the problems or make any efforts towards compliance. The managers were concerned that compliance would prove costly and perhaps jeopardize their project.

The prosecution showed that the environmental problems were (1) within the area of responsibility, authority and supervisory control of these individuals, (2) that they had the power or the capacity to correct the violation, and (3) that the individuals knowingly failed to take any action to prevent, detect or correct the violation. Ms. Barrett pointed out that the defendants' testimony about mission priorities and the lack of funds to correct the situation were an unsuccessful defense in the case. Hence, federal officials acting within the scope of their employment who knowingly violate RCRA and other environmental statutes may be subject to the criminal sanctions set forth in those statutes.

In guiding Commerce officials on how to avoid prosecution we have several preliminary suggestions. First, officials with the responsibility and authority over storing and disposing of hazardous substances should document all their compliance efforts. At the outset the officials should document their requests on what environmental laws are applicable to their activities and what they need to do in order to comply. The officials should document communications which alert their superiors on potential environmental problems. They should also document their efforts to identify the resources available to remedy the situation and the remedial actions taken. Second, if compliance requires additional resources such as personnel or funds, then document such notice to the proper authorities so that the responsible officials can incorporate such needs into future budget requests to the Congress. Ms. Barrett indicated that had the defendants notified their superiors of the problems, the U.S. Attorneys Office would have gone up the chain-of-command and sought an indictment of such officials who had knowledge of the problems but knowingly failed to take any corrective actions.

This office will provide a more detailed analysis of the Aberdeen case, RCRA and other environmental laws as they develop in the future, and remains available to provide counsel as necessary.

* Note that these individuals were prosecuted in their individual capacities and not as agency officials. While the Department of Justice will not sue another agency, employees are not necessarily immune from prosecution.

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**SECO**

Environmental Compliance Office

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**General Counsel of the
United States Department of Commerce
Washington, D.C. 20230
August 19, 1989**

MEMORANDUM Thomas J. Murrin,
FOR: Deputy Secretary

FROM: Wendell L. Willkie, II
 General Counsel

SUBJECT: Liability of Federal Employees for
 Environmental Law Violations

This is in response to your request for information about the exposure of Federal officials to personal liability for violation of environmental laws. The potential does exist for Federal officials to be held personally liable for violation certain environmental laws. the penalties for violating environmental laws will depend on the specific statutes that have been violated, but may include civil or criminal sanctions commensurate with the severity of violation.

In a recent case, civilian managers at the Aberdeen Proving Ground in Maryland were convicted for failing to comply with environmental laws in connection with their managerial responsibilities. In the Aberdeen case, the federal officials were found to have intentionally violated the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. 6961) and could have been sentenced to 15 years in prison and fined \$750,000.

There are other Federal statutes that provide for personal liability on the part of Federal employees for their acts or omissions concerning environmental matters. For example, both the Toxic Substances Control Act (15 U.S.C. 2601) and the Federal Water Pollution Control Act (Clean Water Act) (33 U.S.C. 1251) provide for criminal penalties for violation of certain of their provisions.

The office of Administrative Services Management and its Environmental Compliance Division provide policy guidance in the environmental area. My office has been supplying them with legal support services as requested. Both of our offices have issued initial guidance on environmental compliance matters. In addition to written policy guidance provided to Department components, the Environmental Compliance Division has established an Environmental Task Force to provide a forum for the discussion of environmental issues. This task force includes representatives from my office, the Office of the Inspector General, the Office of Personnel and NOAA's Office of Administration.

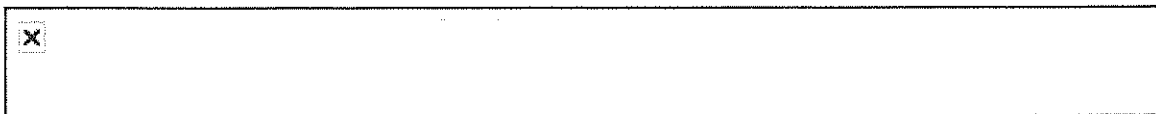
In order to avoid liability, officials responsible for operations at Department facilities which handle hazardous substances, toxic wastes and various chemicals must be aware of their specific responsibilities under the appropriate laws. These facilities include such diverse interests as the Wisconsin Steel site, the Oxford, Maryland fisheries laboratory and the basement of the Hoover Building. Consequently, it is particularly important for the Department to ensure that all employees and officials who have responsibility for matters affected by

the environmental statutes receive the appropriate training so that they will be able to recognize environmental compliance deficiencies.

Once officials have identified particular areas of concern they should document their efforts to take the action required to bring the facilities or operations under their control in compliance with the law. Responsible officials should also notify their superiors of their efforts to obtain compliance.

My office will continue to provide legal support to the Environmental Compliance Division in order to foster awareness of the requirements of environmental laws and to avoid any potential liability on the part of individual Commerce employees.

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United States Department of Commerce
Washington, D.C. 20230
August 30, 1989

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MEMORANDUM Hugh Brennan Director for Procurement and
 FOR: Administrative Services

FROM: Eric W. Moll Acting Assistant General Counsel
 for Administration

SUBJECT: *U.S. v. Carr*: Employee Liability Under
 CERCLA

This is part of the continuing advice requested by your office concerning the potential liability of federal employees for violating environmental laws. This memorandum will briefly review the facts and implications of a recent conviction of a federal employee in New York. In addition, this office is currently working with your office's Environmental Compliance Division on a more detailed memorandum which will identify the requirements and penalties for the primary federal environmental statutes which may be applicable to the Commerce Department and its employees.

In a recent Second Circuit opinion, the U.S. Court of Appeals affirmed the conviction of David James Carr, a federal civilian employee, under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) for failing to report a hazardous waste release from a facility over which he was "in charge." 42 U.S.C. 9063. *See United States v. Carr*, F.2d (2d Cir. 1989), 1989 U.S. App. LEXIS 10951. This case illustrates that federal employees who violate environmental laws are subject to criminal penalties.

Mr. Carr was the maintenance foreman at the Fort Drum Army camp, located in Watertown, New York. In connection with his duties as foreman, he directed several workers to dispose of old cans of waste paint into a small man-made pond. After tossing approximately fifty cans into the pond, the workers noticed that the paint was leaking from the cans. The workers decided to stack the remaining cans into a nearby shed and then warned Mr. Carr that they thought the pond dumping was illegal. Mr. Carr subsequently directed one of the workers to cover up the paint cans by dumping tractor loads of dirt into the pond. The Department of Defense conducted an investigation when one of the employees informed a DOD special agent of the incident. Mr. Carr was subsequently indicted for violating the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6928(d) (2) (A), the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. 9603, and the Clean

Water Act (CWA), 33 U.S.C. 1311 (a), 1319 (c) (1). See 18 U.S.C. 2 (prosecution of principal actors for offenses against the United States). The jury acquitted Mr. Carr of the charges under RCRA and CWA, but convicted on the CERCLA violations. Mr. Carr's sentence of one year in prison was suspended and he was put on one year's probation. See 1989 U.S. App. LEXIS 10951, p. 2-3.

Under section 103 of CERCLA, it is a crime for any person in charge of a vessel or facility to fail to report a prohibited release of hazardous materials to the National Response Center. 42 U.S.C. 9603. The *Carr* decision is significant for determining who may be found to be "in charge" of a facility.

The appellant argues that Congress never intended for the CERCLA reporting requirement (and penalties) to be applied to individuals like Mr. Carr who are relatively low in an organization's chain of command. The Second Circuit disagreed and found that a lower level supervisor could be found to be in charge of a facility. The court pointed out that Mr. Carr had supervisory responsibilities over the subject grounds and trucks and was in a position to detect, prevent and abate the release of the hazardous substances. See 1989 U.S. App. LEXIS 10951, p. 6 citing *United States v. Mobile Oil Corp.*, 464 F.2d 1124, 1127 (5th Cir. 1972). Hence, supervisors, even of relatively low rank, may be liable for unlawful releases and for failing to report such releases to the proper authorities.

This case also indicates that the convictions in the Aberdeen case are not an anomaly but rather indicate a trend in the Justice Department's efforts to get federal facilities in compliance with environmental laws. It is therefore imperative that the Commerce Department identify the existence and potential for environmental violations so that the appropriate corrective and preventative measures can be taken. The Department should instruct its employees on which environmental laws apply to their activities, what those laws require, and what the agencies and employees need to do in order to avoid liability.

Your office has previously requested comprehensive advice on potential liability for environmental violations. This office is currently preparing a memorandum which will identify the primary federal environmental statutes, their requirements and their penalty provisions. This will be coordinated with your Environmental Compliance Division and the NOAA General Counsel's Office to ensure it is in an appropriate form for your office's use in developing policy guidance to the Department and its employees.

cc: Wendell L. Willkie, II

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**REVISED REPORT OF HAZARDOUS
MATERIALS SURVEY**

**Commerce Building
DC0013ZZ
14th Street and Constitution Avenue, Northwest
Washington, D.C.**

Prepared for:
GSA National Capital Region
7th and D Streets, Southwest
Washington, D.C. 20407

Prepared by:
MACTEC Engineering and Consulting, Inc.
22455 Davis Drive, Suite 100
Sterling, Virginia 20164

April 18, 2003

MACTEC Project 20340-2-3144.*.606



April 18, 2003

Ms. Cathy Figuracion
Contracting Officer's Representative
General Services Administration, NCR, PBS
Safety, Environment & Fire Protection Branch (WPYG)
7th & D Streets, Southwest, Room 2080
Washington, DC 20407

**Subject: Revised Report of Hazardous Materials Survey
Commerce Building - DC0013ZZ
14th Street and Constitution Avenue, Washington, DC
GSA Project Order No. P-11-02-DC-0366
MACTEC Project 20340-2-3144.*.606**

Dear Ms. Figuracion:

MACTEC Engineering and Consulting, Inc. (MACTEC) is pleased to present this revised report of our hazardous materials survey at the Commerce Building in Washington, DC. Our services were provided at your request based on your acceptance of MACTEC Proposal No. 20399-0-0000.1188, dated September 13, 2002, and our knowledge of projects similar in size and scope.

The report has been revised to incorporate the comments sent to MACTEC by U.S. General Services Administration (GSA) Industrial Hygienist, Mr. Timothy Sleeth, via electronic mail on April 7, 2003. The revisions consist of referencing the GSA Project Order Number in the "subject" header and providing the homogenous sampling area (HSA) number on the Asbestos Assessment Data Forms continuation sheets located in Appendix B. The report includes sections describing project information, scope of services, results and findings, and conclusions and recommendations. Also included in the report are appendices consisting of an asbestos-containing material summary table, homogeneous sampling area assessment field forms, asbestos analytical laboratory reports, lead XRF testing data summary tables, fluorescent light ballast field forms, and field drawings indicating inaccessible areas.

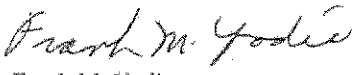
We appreciate the opportunity to provide service to the U.S. General Services Administration for this project. Should you have any questions following your review of our report, or if we may be of further service please do not hesitate to contact us.

Sincerely,

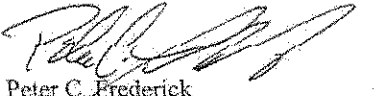
MACTEC ENGINEERING AND CONSULTING, INC.



Eric Mercer
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REVISED REPORT OF HAZARDOUS MATERIALS SURVEY

Commerce Building
DC0013ZZ
Washington, D.C.

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1.0 INTRODUCTION

1.1 Project Information

Based upon our current environmental contract with the General Services Administration (GSA), Contract GS-10F-0346K, your acceptance of MACTEC Engineering and Consulting, Inc.'s (MACTEC) Proposal No. 20399-0-0000.1188, dated September 13, 2002, and our knowledge of projects similar in size and scope, MACTEC has conducted a hazardous materials survey of the Commerce Building located at Fourteenth Street and Constitution Avenue, Northwest, Washington, D.C. This report presents MACTEC's scope of work, results and findings, and conclusions and recommendations.

The purpose of the hazardous materials survey was to identify asbestos-containing materials (ACM), lead-containing surface coatings (LCSC), and polychlorinated biphenyl (PCB) containing fluorescent light ballasts within the Commerce Building. The survey was conducted by a team of Environmental Protection Agency (EPA) accredited asbestos inspectors and a District of Columbia licensed lead paint inspector/risk assessor.

1.2 Executive Summary

1.2.1 Asbestos-Containing Materials

Based upon review of previous survey information, our observations, and laboratory analytical reports, the following asbestos-containing flooring and miscellaneous materials were observed during our survey.

12" x 12" Floor tile – white with green spots	Black floor mastic under floor tile throughout
Black mastic on uninsulated metal ducts	9" x 9" Floor tile – brown with white spots
9" x 9" Floor tile – tan with brown and white streaks	Brown mastic on uninsulated metal ducts
9" x 9" Floor tile – off-white with black streaks	Brown leveling compound under flooring materials
9" x 9" Floor tile – off-white with gray and black spots	12" x 12" Floor tile – brown with rock pattern
Brown glue dots above 12" x 12" spline ceiling tile	12" x 12" Floor tile – white with gray and blue specks
9" x 9" Floor tile – rust with dark brown spots	9" x 9" Floor tile – dark brown with red and white streaks
9" x 9" Floor tile – aqua with white specks	White mastic on fiberglass duct insulation
9" x 9" Floor tile – lime-green with white streaks	12" x 12" Floor tile – greenish beige with white streaks
12" x 12" Floor tile – brick with white streaks	12" x 12" Floor tile – off-white with black streaks

9" x 9" Floor tile – brown with orange, brown, white	9" x 9" Floor tile – yellowish with brown spots
9" x 9" Floor tile – Under 9" x 9" tan floor tile.	12" x 12" Floor tile – tan with brown and white streaks
Brown floor covering underlayment and associated black floor mastic in child care center	12" x 12" Floor tile – tan floor tile under non-asbestos gray floor tile in child care center
Assumed asbestos-containing firedoors	Assumed asbestos-containing transite board
Cloth flexible duct connectors	

Based upon laboratory analytical reports the following asbestos-containing thermal system insulation and surfacing materials were observed during our survey.

Magnesia pipe hanger pads on fiberglass insulated pipes	Skimcoat mud on fiberglass insulated pipe valves and reductions
Mudded joint packings on pipes	Skimcoat mud on fiberglass insulated pipe elbows
Magnesia boiler insulation	Spray-on fireproofing on I-beams
Textured wall plaster	Felt wool pipe insulation
Corrugated duct insulation	Acoustical ceiling plaster
Assumed asbestos-containing magnesia pipe insulation within wall cavities	Assumed asbestos-containing magnesia pipe insulation throughout
Assumed asbestos-containing aircell pipe insulation throughout	

Refer to Section 2.2 for conclusions and recommendations based on our observations. In addition, refer to Appendix A - Asbestos-Containing Material Summary Table and Appendix B - Homogeneous Sampling Area Assessment Field Forms for approximate locations, conditions, and quantities of the materials observed during our survey.

1.2.2 Lead-Containing Surface Coatings

Based upon our observations and testing results, approximately 49% of the tested building components measured detectable concentrations of lead. Approximately 36% of the tested building components measured at or above the District of Columbia definition of lead-based paint and approximately 15% measured less than the detection limit of the instrument. Therefore, it is expected that surface coatings that are considered either lead-containing or lead-based will be impacted during renovation activities. Refer to Section 3.3 for conclusions and recommendations based on our findings.

Refer to the XRF summary data tables in Appendix D for individual test results and conditions of each component tested.

1.2.3 Polychlorinated Biphenyl (PCB) Containing Light Ballasts

MACTEC observed approximately 2,000 fluorescent light fixtures with suspect PCB containing light ballasts within the Commerce Building. Approximately 50% of the light fixtures were observed to have assumed PCB-containing light ballasts.

2.0 ASBESTOS-CONTAINING MATERIALS

2.1 Scope of Services

Prior to conducting the asbestos survey, MACTEC was provided access to available building drawings located in the Technical Resource Center in GSA's Regional Office Building (ROB). In addition, MACTEC was provided a spreadsheet of previous asbestos survey data collected by other environmental consulting firms to review and incorporate as part of our survey. This data was reported by GSA to be approximately 90% complete for the building and could be relied upon by confirmation. However, MACTEC was not able to confirm the data in the spreadsheet due to the variability of material descriptions, quantities, and sample locations. Therefore, following review of the previous asbestos survey spreadsheet, MACTEC conducted the survey without relying upon or using the previous survey information with authorization from GSA. Conducting the survey in this manner was not part of the original proposed scope of work of confirming the previous survey data. As such, MACTEC was required to collect significantly more bulk samples than originally proposed as well as requiring more survey time quantifying the ACM identified by MACTEC.

MACTEC was also provided a previous asbestos survey report by Applied Environmental, Inc. dated September 6, 2000 which consisted of asbestos survey data for the child day care center. The two identified miscellaneous asbestos-containing flooring materials are incorporated into this report.

The asbestos survey was primarily conducted during business hours as agreed upon by GSA. Areas that were not accessed and subsequently not surveyed are indicated on the hand annotated field drawings in Appendix F.

The asbestos survey was completed in general accordance with EPA Standards 40 CFR 763, Subpart E, Asbestos Hazard Emergency Response Act (AHERA), 40 CFR 61, Subpart M, National Emission Standards for hazardous Air Pollutants (NESHAP), and OSHA Standard 29 1926.1101 sampling protocol. Following a visual inspection of the building for suspect asbestos-containing materials, MACTEC collected representative bulk samples from suspect asbestos-containing homogeneous sampling areas (HSAs) that were observed at the time of the survey. Homogeneous sampling areas are materials that are similar in texture, size, color, age, etc. Destructive and exploratory testing was not conducted as part of the survey as the building is currently occupied. In addition, the roofing system and exterior of the building was not included in the scope of work.

The collected bulk samples were submitted to the EMSL Analytical, Inc. (EMSL) asbestos analytical laboratory located in Beltsville, Maryland for analysis. Selected bulk samples were analyzed by Polarized Light Microscopy (PLM) coupled with Dispersion Staining in accordance with EPA Method Determination of Asbestos in Bulk Building Materials (EPA 600/R-93/116). The EMSL asbestos analytical laboratory is accredited by the National Voluntary Laboratory Accreditation Program (NVLAP) and American Industrial Hygiene Association (AIHA) for bulk asbestos identification by PLM. Copies of the laboratory analytical reports are provided in Appendix C for your reference.

2.2 Findings and Results

MACTEC has presented a summary table of the observed suspect and confirmed ACM in Appendix A in the format requested by GSA. The table format used in summarizing the ACM data is used so that the information can be easily entered into an electronic data management system by GSA. The table summarizes the HSAs observed by MACTEC, the sample locations, analytical results, assessed condition in relation to whether the material is friable or non-friable and regulated or non-regulated, and the approximate quantity observed by MACTEC.

The ACM observed by MACTEC during the survey was generally in good condition, with the exception of the following areas. Refer to Appendix B – Homogeneous Sampling Area Assessment Field Forms for specific locations of other areas where damage was observed.

- A hole was observed in the ceiling of the "Ping Pong" room in the attic central eastern corridor, northwest corner of the room. Spray-applied fireproofing is above the ceiling and around the edges of the hole.
- MACTEC observed a metal grate above spray-applied fireproofing in Wing 5 of the attic, near column M3-119. Overspray was present on the metal grate. The grate was placed over the fireproofing to allow workers to service pumps and valves mounted over the fireproofing. There is a potential exposure hazard for workers walking on the overspray. MACTEC also observed the same condition on a metal grate in Wing 2 of the attic, near column M3-142.
- Spray-applied fireproofing was observed on the underside of the ceiling in Wing 3 on the 7th Floor.

- Spray-applied fireproofing debris was observed on the floor of the electrical closet in Room 7703, in Wing 7 of the 7th Floor. A hole in the ceiling was also observed in this electrical closet. Spray-applied fireproofing is present above the ceiling and around the edges of the hole.
- Significantly damaged magnesia pipe insulation was observed in the 1st Floor White House Visitors Center. The damage was observed in an electrical closet in the southeast corner in a hallway adjacent to the restroom area. Approximately 50 linear feet of pipe insulation was significantly damaged with several large pieces of insulation debris on the floor.
- Significantly damaged mudded joint packings on fiberglass pipe insulation were observed in Room B20 in the basement.
- Significantly damaged mudded joint packings on fiberglass pipe insulation were observed in in the Southeast Quadrant of the Attic.
- Significantly damaged Corrugated Duct Insulation was observed in the Basement Aquarium Corridor.
- Significantly damaged Aircell pipe insulation was observed in the Basement Aquarium Viewing Area.
- Significantly damaged magnesia pipe insulation was observed in the following areas:
 - Wing 3 Basement Mechanical Room
 - B003 in the basement
 - B626 and B612 in the basement
 - Records storage #2 in the basement mezzanine level
 - attic in wing 5, the west central corridor, and the east central corridor
 - attic above the entrance to Stairwell #4
 - attic in Room M3-141 of Wing 2
 - B-826 in the basement
 - Aquarium Viewing Area in the basement
 - Mechanical Equipment Across B511A in the basement
 - Men's Restroom Across from B884 in the basement
 - 7614 on the 7th Floor
 - 7th Floor Corridor 5
 - 5th Floor Central East Corridor
 - 5034 on the 5th Floor
 - 1851 on the 1st Floor
 - 1082 on the 1st Floor
 - 7th Floor Central East Corridor

MACTEC informed the Building Manager, Mr. Jim Beam, of the above mentioned areas with significantly damaged ACM. Mr. Beam's staff subsequently repaired the magnesia pipe insulation in the attic above the Stair #4 entrance. The staff also encapsulated the metal grates in the attic, near columns M3-113 and M3-142, and they covered the metal grates with plywood to allow work to be performed on the valves and pumps safely.

2.3 Conclusions and Recommendations

The observed ACM was assessed primarily by determining whether the material was either friable or non-friable as defined in EPA Standard 40 CFR Part 61, Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP); Asbestos NESHAP Revision; Final Rule. A non-friable asbestos-containing material is any material that contains more than one percent asbestos by weight that hand pressure cannot crumble, pulverize, or reduce to powder when dry. A friable asbestos-containing material is one that can be crumbled, pulverized, or reduced to powder by hand pressure when dry. The non-friable ACM that were observed by MACTEC were in good condition at the time of the survey.

MACTEC recommends that the building manager's staff address the problems listed. In addition, caution should be used when accessing above or moving ceiling tiles in the 3rd Wing of the 7th Floor due to the potential exposure from the spray-applied fireproofing on the I-beams.

The observed significantly damaged ACM within the building should be repaired or removed as soon as possible by a qualified, licensed asbestos abatement contractor in accordance with applicable federal and District of Columbia regulations and GSA asbestos abatement specifications. Access to areas where significantly damaged friable ACM was observed should be restricted to personnel with a minimum of two hour asbestos awareness training in accordance with OSHA regulations. Caution should be taken when accessing areas above ceilings where MACTEC observed damaged ACM. Engineering controls such as plastic drop cloths and vacuums equipped with High Efficiency Particulate Air (HEPA) filters may be necessary due to the presence of significantly damaged ACM lying on the ceiling tiles.

Specific locations where MACTEC observed ACM and the assessed friability of the materials are indicated in Appendix B Homogeneous Sampling Area Assessment Field Forms. Asbestos-containing materials must be removed by a qualified, District of Columbia licensed asbestos abatement contractor

prior to being impacted by any renovation or selective demolition activities in accordance with all applicable EPA, OSHA, and District of Columbia regulations.

Due to limited accessibility and the presence of building materials limiting the observation of large areas of the building, such as carpeting over floor tile or enclosed ceiling systems, MACTEC recommends that materials that are prevalent throughout the building be considered asbestos-containing unless specific location testing is conducted. In addition, suspect ACM in areas that were not accessed or observed by MACTEC should be compared to the information contained in Appendices A and B to determine whether or not the materials are homogeneous with the ACM identified by MACTEC.

MACTEC considers the black floor tile mastic observed generally throughout the building as asbestos-containing based upon the laboratory results. However, due to the inconsistency of the analytical results and the variability of the homogeneity of the material, MACTEC recommends that representative confirmatory bulk samples be collected from the black floor mastic to definitively determine the asbestos content in specific renovation project locations.

The EPA recommends that asbestos-containing materials be managed and maintained by use of an asbestos Operations and Maintenance (O&M) Program. The ACM should be periodically inspected for damage by properly trained building maintenance personnel as part of the O&M Program. ACM observed to be damaged should be repaired or removed by a licensed asbestos abatement contractor in accordance with all applicable regulations.

3.0 LEAD-CONTAINING SURFACE COATINGS

3.1 Scope of Services

MACTEC conducted a screening survey to identify suspect lead-containing surface coatings (LCSC) within the building. The survey was conducted by an EPA accredited Lead Paint Inspector/Risk Assessor licensed in the District of Columbia. Representative suspect surfaces were tested for the presence of lead using an X-Ray Fluorescence (XRF) spectrum analyzer field instrument. Over 1,000 readings were taken from representative interior surfaces at the subject site.

A Niton XL-309 XRF spectrum analyzer was used for the lead-based paint survey. The XL-309 is designed for measuring concentrations of lead using non-destructive techniques by emitting low level x-rays through layers of paint and measuring the total lead concentration in the layers of paint for the known surface area. The XL-309 software is designed to determine if the concentration of lead measured is either above or below the user-set action level within a 95% confidence level. The action level for the instrument was set to the District of Columbia definition of lead-based paint, greater than 1.0 mg/cm². Tests that measure above the detection limit of 0.03 mg/cm², but below the quantitation limit of 0.10 mg/cm², are considered as unquantifiable detectable concentrations of lead. Tests that measure above the detection limit and below the definition of lead-based paint are reported as lead-containing surface coatings or "LCSC". Tests that measure equal to or greater than the District of Columbia's definition of lead-based paint are reported as lead-based paint or "LBP". The evaluation of the XRF measurement test results is based upon the upper 95% confidence value as this value provides the statistically highest calculated measurement of lead for that sample.

3.2 Findings and Results

Based upon our observations and testing results, approximately 49% of the tested building components measured detectable concentrations of lead. Approximately 36% of the tested building components measured at or above the District of Columbia definition of lead-based paint and approximately 15% measured less than the detection limit of the instrument.

Refer to the XRF summary data tables in Appendix D for individual test results and conditions of each component tested.

3.3 Conclusions and Recommendations

If the intent of construction activities is to permanently eliminate lead-based paint hazards by removing LBP or permanently enclosing components containing LBP, then the work must be considered LBP abatement. Contractors or trade workers involved in the abatement of surfaces containing lead greater than the District of Columbia definition of lead-based paint, 1.0 mg/cm² as measured by XRF analysis or 0.5% lead by weight, must be licensed in the District of Columbia and adhere to the OSHA Lead in Construction Standard 29 CFR 1926.62, as well as applicable District of Columbia regulations for lead abatement. However, if the intent of the work activities is to repair or renovate components, and lead-based paint or lead-containing surface coatings are impacted during this process, then the work does not have to be considered as an abatement project. Trade workers involved in repairs or renovations will still have to comply with the OSHA Lead in Construction Standard but may not have to comply with District of Columbia lead abatement regulations.

The OSHA Lead in Construction Standard does not currently define a specific concentration of lead that must be present within paint for it to be considered "lead-containing." Therefore, painted and glazed surfaces that contain detectable concentrations of lead, including concentrations less than the District of Columbia definition of lead-based paint, must be handled in accordance with the OSHA Lead in Construction Standard. Contractors performing work that could impact paint films or glazing that have detectable concentrations of lead should be informed of the testing results, and should take appropriate actions to comply with the OSHA Lead in Construction Standard.

Workers performing renovation and selective demolition of lead-containing surface coatings must have, at a minimum, two-hour lead awareness training in accordance with OSHA Standard 29 CFR 1926.62. If lead-containing surface coatings are required to be stripped or removed from the building component substrate, then additional training would be required based upon the measured lead concentration of the surface coating and the airborne lead concentrations measured during the work activity.

The disposal of waste generated during any restoration, renovation, or demolition operations, including items coated with lead paint, is regulated by EPA Standard 40 CFR 261, Subpart C. This regulation requires that a Toxicity Characteristic Leaching Procedure (TCLP) test be utilized to determine if the construction debris is considered hazardous waste. A material is considered hazardous if it is ignitable, reactive, corrosive, or toxic.

It is generally recommended that items with relatively high concentrations of lead be segregated from other items and tested separately. The intent should be to assure that any item that is categorized as hazardous waste be identified and kept segregated from other waste material, while not to bias the sampling results (either positively or negatively) with regard to TCLP sampling. Depending on the renovation and demolition techniques, the TCLP sample should be collected in a manner to represent the whole construction waste stream. The collection of bulk samples for TCLP analysis was not included in the scope of work.

4.0 POLYCHLORINATED BIPHENYL LIGHT BALLASTS

4.1 Scope of Services

A visual inspection of the fluorescent lighting fixtures within the building was conducted to identify PCB markings on the ballasts. A representative number of the light ballasts, approximately ten percent, were visually inspected for markings indicating that the ballasts do not contain PCBs. Observed ballasts labeled "No PCBs" are considered to not contain PCBs. If the "No PCBs" label was not observed, the ballasts are assumed to contain PCBs. Evidence of leaking was also noted as part of the survey.

4.2 Findings and Results

Survey data indicates that PCB-containing light ballasts were observed in various areas throughout the building. Refer to the following table for locations and approximate quantities of those ballasts that did not have "No PCBs" labeling and are therefore assumed to be PCB-containing.

The following list and table describes each type of fluorescent light fixture and assumed PCB containing ballast observed during the survey:

Fluorescent Fixture Type Descriptions

- Type A – 2' x 4' fixture with 2 tubes and a lay in diffuser and one ballast;
- Type B – 2' x 4' fixture with 2 tubes with a plastic grid diffuser and one ballast;
- Type C – 2' x 4' fixture with 2 tubes and a hinged plastic diffuser and 2 ballasts;
- Type D – 1' x 2' fixture with 2 tubes and a plastic diffuser and one ballast;
- Type E – 1' x 4' suspended fixture with 4 tubes and no diffuser and 2 ballasts;
- Type F – 2' x 4' fixture with 4 tubes and a hinged plastic diffuser and 2 ballasts;
- Type G – 6" x 4' fixture with no covering with one tube and one ballast;
- Type H – 2' x 4' fixture with 2 tubes and a lay in diffuser and 2 ballasts;
- Type I – 1' x 4' fixture with 2 tubes and a hinged plastic diffuser and one ballast;
- Type J – 1' x 4' fixture with no covering and 2 tubes and one ballast;
- Type K – 6" x 4' fixture with no covering with 2 tubes and one ballast;
- Type L – 6" x 8' fixture with no covering and 2 tubes one ballast;
- Type M – 18" x 4' fixture with 4 tubes and a open grid and 2 ballasts;
- Type N – 1' x 4' fixture with 3 tubes and open rounded metal and 2 ballasts; and
- Type O – 18" x 4' fixture with 2 tubes and a open grid and one ballast.

Fluorescent Light Fixture Types and PCB Ballasts

Floor	Fixture Type	Manufactures	Catalog Number	Approximate Quantity
Basement	A	Universal	446-L-TC-P	140
Basement	B	General Electric	8G1020	120
Basement	C	Universal	446-L-TC-P	21
Basement	D	Universal	447-L-TC-P	32
Basement	E	Universal	446-LR-TC-P	40
Basement	F	Universal	446-L-TC-P	50
Basement Mezz.	G	General Electric	8G1076	20
Sub-Basement	F	Universal	446-L-TC-P	10
1 st Floor	H	Universal	446-L-TC-P	170
1 st Floor	I	Universal	447-L-TC-P	32
2 nd Floor	C	Universal	446-L-TC-P	170
2 nd Floor	I	Universal	564-L-TC	32
2 nd Floor	F	Advance	RQM-2540-3-TP	30
3 rd Floor	A	Universal	446-L-LH-TC-P	170
3 rd Floor	I	Universal	447-L-TC-P	33
3 rd Floor	F	Advance	RQM-2540-T-TP	8
4 th Floor	A	Universal	446-L-TC-P	170
4 th Floor	I	Universal	564-L-TC	32
5 th Floor	I	Universal	446-LR-TC-P	32
5 th Floor	A	Universal	446-LR-TC-P	170
6 th Floor	A	Universal	446-L-TC-P	170
6 th Floor	F	Universal	446-LR-TC-P	68
6 th Floor	D	Universal	446-LR-TC-P	32
7 th Floor	J	Advance	RQM-2540-TP	4
7 th Floor	A	Universal	446-L-TC-P	170
Attic	I	General Electric	GG102-G-90	8
Attic	K	Advance	RQM-2540-1-TP	19
Attic	F	Advance	RQM-2540-TP	15
Attic	L	Universal	412-L-TC-P	32
Attic	M	General Electric	6G-1020-G90	4
Attic	G	General Electric	7G1061	6
Attic	D	Universal	564-L-C	20
Attic	N	Advance	RQM-2540-TP	3
Attic	O	Advance	HQM-2540-3-TP	6
Total PCB Ballasts Observed:				2608
Total Fixtures Observed:				2029

4.3 Conclusions and Recommendations


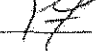
PCB-containing light ballasts are present in the Commerce Building. Each fluorescent light fixture should be visually inspected for markings indicating that the ballasts do not contain PCBs prior to being impacted by renovation or demolition activities. If PCB-containing light ballasts are identified and observed to be leaking, the EPA recommends that the PCB-containing ballasts be sealed in 55-gallon drums and be recycled or incinerated at an approved facility rather than disposed of at a municipal solid waste landfill.

APPENDIX A

Asbestos Containing Material Summary Table


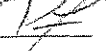
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 Asbestos-Containing Building Materials Summary
 DC0013ZZ

HSA No.	Mactec Sample No.	Material Sampled	Sample Location	Analytical Result	Regulated ACM	Friable	Approximate Quantity Observed
MEC-HSA-001	COM-001	Flexible Duct Connector	Attic Elevator Machine Room Group 4	45% Chrysotile	Yes	No	27 ea.
MEC-HSA-002	COM-002	Pipe Hanger Pad - On Fiberglass Pipe Insulation	Attic - Wing 3	30% Chrysotile	Yes	Yes	1,200 sf
MEC-HSA-002	COM-003	Pipe Hanger Pad - On Fiberglass Pipe Insulation	Attic - Wing 3	30% Chrysotile	Yes	Yes	1,200 sf
MEC-HSA-002	COM-004	Pipe Hanger Pad - On Fiberglass Pipe Insulation	Attic Elevator Machine Room Group 4	30% Amosite	Yes	Yes	1,200 sf
MEC-HSA-003	COM-005	Skim Coat Mud - On Fiberglass Insulated Pipe Valves and Reductions	Attic - Southwest Corner	20% Chrysotile	Yes	Yes	Unquantifiable
MEC-HSA-003	COM-006	Skim Coat Mud - On Fiberglass Insulated Pipe Valves and Reductions	Attic - Southwest Corner	None Detected	Yes	Yes	Unquantifiable
MEC-HSA-003	COM-007	Skim Coat Mud - On Fiberglass Insulated Pipe Valves and Reductions	Attic - Southwest Corner, Wing 2	None Detected	Yes	Yes	Unquantifiable
MEC-HSA-004	COM-008	Floor Tile - 12" x 12" - White with Green Spots	Attic - East Central Corridor	5% Chrysotile	No	No	2,000 sf
MEC-HSA-005	COM-009	Floor Tile Mastic - Black	Attic - East Central Corridor	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-024	Floor Tile Mastic - Black	Attic - East Central Corridor	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-041	Floor Tile Mastic - Black	Room 4035	7% Chrysotile	No	No	662,600 sf
MEC-HSA-005	COM-043	Floor Tile Mastic - Black	Room 3099C	8% Chrysotile	No	No	662,600 sf
MEC-HSA-005	COM-053	Floor Tile Mastic - Black	Room 6029B	2% Chrysotile	No	No	662,600 sf
MEC-HSA-005	COM-056	Floor Tile Mastic - Black	Room 6043	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-058	Floor Tile Mastic - Black	Room 6043	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-062	Floor Tile Mastic - Black	Room 6701	None Detected	No	No	662,600 sf

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HSA No.	Mactec Sample No.	Material Sampled	Sample Location	Analytical Result	Regulated ACM	Friable	Approximate Quantity Observed
MEC-HSA-005	COM-065	Floor Tile Mastic - Black	Sixth Floor Snack Bar	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-069	Floor Tile Mastic - Black	Sixth Floor Snack Bar #57	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-075	Floor Tile Mastic - Black	Fifth Floor Stairway 9	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-081	Floor Tile Mastic - Black	Room B220A	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-083	Floor Tile Mastic - Black	Basement - Printing Break Room	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-085	Floor Tile Mastic - Black	B - 012	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-088	Floor Tile Mastic - Black	B - 014	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-090	Floor Tile Mastic - Black	B - 212	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-100	Floor Tile Mastic - Black	B - 904	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-108	Floor Tile Mastic - Black	Basement Mezzanine - Records Storage	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-110	Floor Tile Mastic - Black	Basement Mezzanine - Hallway outside BM - 25	6% Chrysotile	No	No	662,600 sf
MEC-HSA-005	COM-112	Floor Tile Mastic - Black	Basement Mezzanine - Hallway outside BM - 25	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-114	Floor Tile Mastic - Black	Sub Basement - Hallway outside SB702	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-116	Floor Tile Mastic - Black	Seventh Floor Wing 2 near Stairway 3	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-122	Floor Tile Mastic - Black	Room 1117	None Detected	No	No	662,600 sf
MEC-HSA-005	COM-124	Floor Tile Mastic - Black	Room 1617	None Detected	No	No	662,600 sf

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
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HSA No.	Mactec Sample No.	Material Sampled	Sample Location	Analytical Result	Regulated ACM	Friable	Approximate Quantity Observed
MEC-HSA-006	COM-010	Pipe Elbow Debris	Attic - Southeast Corner	20% Chrysotile	Yes	Yes	1,150 ea
MEC-HSA-006	COM-013	Pipe Elbow Debris	Attic - Corridor 7 near Northeast Corner	8% Chrysotile	Yes	Yes	1,150 ea
MEC-HSA-006	COM-017	Mudded Joint Packing - On Fiberglass Pipe Insulation	Attic - Stair 8 Central East Corridor	20% Chrysotile	Yes	Yes	1,150 ea
MEC-HSA-006	COM-018	Mudded Joint Packing - On Fiberglass Pipe Insulation	Attic - Northeast Corridor Near Transformer Room 14	25% Chrysotile	Yes	Yes	1,150 ea
MEC-HSA-006	COM-019	Mudded Joint Packing - On Fiberglass Pipe Insulation	Attic - Stair 13, Wing 8	20% Chrysotile	Yes	Yes	1,150 ea
MEC-HSA-007	COM-011	Brown Mastic under Covebase	Attic - East Central Corridor Near Ping Pong Room	None Detected	No	No	
MEC-HSA-007	COM-070	Brown Mastic under Covebase	Room 6640	None Detected	No	No	
MEC-HSA-007	COM-076	Brown Mastic under Covebase	Room 4221	None Detected	No	No	
MEC-HSA-008	COM-012	Mastic - Beige on Fiberglass Duct Insulation	Attic - Northeast Corridor	None Detected	No	No	
MEC-HSA-009	COM-014	Mastic - Black on Metal Ducts	Attic - Wing 1 near Southwest Corner	10% Chrysotile	No	No	50 sf
MEC-HSA-010	COM-015	Skim Coat Mud - On Fiberglass Insulated Pipe Elbows	Attic - East Central Corridor	6% Chrysotile	Yes	Yes	100 ea
MEC-HSA-010	COM-016	Skim Coat Mud - On Fiberglass Insulated Pipe Elbows	Attic - East Central Corridor	6% Chrysotile	Yes	Yes	100 ea
MEC-HSA-010	COM-020	Skim Coat Mud - On Fiberglass Insulated Pipe Elbows	Attic - East Central Corridor	8% Chrysotile	Yes	Yes	100 ea
MEC-HSA-011	Assumed	Magnesia Boiler Insulation	Basement - Big Mechanical Room	Assumed	Yes	Yes	930 sf
MEC-HSA-012	COM-021	Gypsum Wall Board	Attic - Corridor 5	None Detected	No	No	
MEC-HSA-012	COM-056	Gypsum Wall Board	Room 4098 B	None Detected	No	No	

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HSA No.	Master Sample No.	Material Sampled	Sample Location	Analytical Result	Regulated ACM	Friable	Approximate Quantity Observed
MEC-HSA-013	COM-022	Gypsum Wall Board Joint Compound	Attic - Corridor 5	None Detected	No	No	
MEC-HSA-014	COM-023	Floor Tile - 9" x 9" - Brown and White Spots	Attic - East Central Corridor	4% Chrysotile	No	No	1,700 sf
MEC-HSA-015	COM-074	Floor Tile - 12" x 12" - Black with White Streaks	Fifth Floor Stairway 9	None Detected	No	No	
MEC-HSA-016	COM-025	Wire Insulation	Attic - East Central Corridor	None Detected	No	No	
MEC-HSA-017	COM-026	Floor Tile - 9" x 9" - Tan with Brown and White Streaks	Seventh Floor Corridor	1.7% Chrysotile (TEM analysis)	No	No	370,000 sf
MEC-HSA-017	COM-042	Floor Tile - 9" x 9" - Tan with Brown and White Streaks	Room 3099C	2.3% Chrysotile (TEM analysis)	No	No	370,000 sf
MEC-HSA-017	COM-040	Floor Tile - 9" x 9" - Tan with Brown and White Streaks	Room 4035	1.9% Chrysotile (TEM analysis)	No	No	370,000 sf
MEC-HSA-018	COM-027	Ceramic Wall - Tile Grout	Room 7021 M	None Detected	No	No	
MEC-HSA-018	COM-051	Ceramic Wall - Tile Grout	Room 8229 W	None Detected	No	No	
MEC-HSA-019	COM-029	Brown Mastic on Metal Duct	Room 7019	3% Chrysotile	No	No	17,125 sf
MEC-HSA-019	COM-072	Brown Mastic on Metal Duct	Room 6814	4% Chrysotile	No	No	17,125 sf
MEC-HSA-020	COM-030	Floor Tile - 9" x 9" - Off White with Black Streaks	Room 7021 B	12% Chrysotile	No	No	6,550 sf
MEC-HSA-021	COM-063	Sprayed - on Insulation on I - Beams	Room 6807	25% Chrysotile	Yes	Yes	143,170 sf
MEC-HSA-021	COM-077	Sprayed - on Insulation on I - Beams	Basement - Big Mechanical Room	40% Chrysotile	Yes	Yes	143,170 sf

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HSA No.	Mactec Sample No.	Material Sampled	Sample Location	Analytical Result	Regulated ACM	Friable	Approximate Quantity Observed
MEC-HSA-022	COM-032	Floor Tile - 12" x 12" - Beige with Brown and White Splashes	Seventh Floor - East Central Vending Area	None Detected	No	No	
MEC-HSA-023	COM-078	Trowel Ceiling Textured	Basement - Mezzanine Mechanical Room	None Detected	No	No	
MEC-HSA-023	COM-079	Trowel Ceiling Textured	Basement - Mezzanine Mechanical Room	None Detected	No	No	
MEC-HSA-024	COM-034	Floor Tile - 12" x 12" - Solid Gray with no mastic	Room 7029	None Detected	No	No	
MEC-HSA-025	COM-035	Brown Leveling Compound	Seventh Floor - East Central Corridor Library	15% Chrysotile	No	No	19,920 sf
MEC-HSA-025	COM-050	Brown Leveling Compound	Room 6006	8% Chrysotile	No	No	19,920 sf
MEC-HSA-026	COM-033	Brown Fire Stop Mastic	Room 7062	None Detected	No	No	
MEC-HSA-027	COM-037	Black Fibrous Wall Insulation	Room 7606	None Detected	No	No	
MEC-HSA-028	COM-080	Floor Tile - 9" x 9" - Off White with Gray and Black Spots	Room B - 220A	6% Chrysotile	No	No	330 sf
MEC-HSA-029	COM-082	Floor Tile - 12" x 12" - Brown with a Rock Pattern	Basement - Printing Break Room	5% Chrysotile	No	No	150 sf
MEC-HSA-030	COM-044	Ceiling Tile - 12" x 12" - Spline	Seventh Floor - Corridor 4 Adjacent to Room 7432	None Detected	No	No	
MEC-HSA-030	COM-054	Ceiling Tile - 12" x 12" - Spline	Room 6029B	None Detected	No	No	
MEC-HSA-031	COM-045	Brown Mastic Glue Dots on 12" x 12" Spline	Seventh Floor - Corridor 4 Adjacent to Room 7432	6.6% Chrysotile (TEM analysis)	No	No	15,780 sf
MEC-HSA-031	COM-071	Brown Mastic Glue Dots on 12" x 12" Spline	Room 6814	None Detected	No	No	15,780 sf
MEC-HSA-032	COM-046	Floor Tile - 12" x 12" - White with Gray and Blue Specks	Seventh Floor - Corridor 4 Adjacent to Room 7432	3% Chrysotile	No	No	800 sf
MEC-HSA-033	COM-084	Floor Tile - 9" x 9" - Green with Black Streaks	Room B - 012	None Detected	No	No	

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
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HSA No.	Mactec Sample No.	Material Sampled	Sample Location	Analytical Result	Regulated ACM	Friable	Approximate Quantity Observed
MEC-HSA-034	COM-048	Floor Tile - 9" x 9" - Rust with Dark Brown Spots	Room 6013	4% Chrysotile	No	No	7,700 sf
MEC-HSA-034	COM-052	Floor Tile - 9" x 9" - Rust with Dark Brown Spots	Room 6029B	6% Chrysotile	No	No	7,700 sf
MEC-HSA-035	COM-086	Floor Tile - 12" x 12" - Purple with no mastic	Room B - 012	None Detected	No	No	
MEC-HSA-036	COM-055	Floor Tile - 9" x 9" - Dark Brown with Red and White Streaks	Room 6043	3% Chrysotile	No	No	5,950 sf
MEC-HSA-036	COM-057	Floor Tile - 9" x 9" - Dark Brown with Red and White Streaks	Room 6043	Not Analyzed	No	No	5,950 sf
MEC-HSA-037	COM-091	Textured Wall Plaster	Room B-212	35% Chrysotile	Yes	Yes	11,700 sf
MEC-HSA-037	COM-092	Textured Wall Plaster	Room B-314	40% Chrysotile	Yes	Yes	11,700 sf
MEC-HSA-038	COM-059	Black Cork Board Pipe Insulation <12" Diameter	Sixth Floor - Central East Corridor Above Room 6047	None Detected	No	No	
MEC-HSA-039	COM-060	Felt Wool Pipe Insulation <12" Diameter	Sixth Floor - Central East Corridor Above Room 6047	<1% Crocidolite, 3% Chrysotile	Yes	Yes	3,600 lf
MEC-HSA-039	COM-073	Felt Wool Pipe Insulation <12" Diameter	Sixth Floor - Corridor 4 above Room 6425	Not Analyzed	Yes	Yes	3,600 lf
MEC-HSA-040	COM-061	Floor Tile - 9" x 9" - Aqua with White Specks	Room 6701	2% Chrysotile	No	No	7,600 sf
MEC-HSA-040	COM-087	Floor Tile - 9" x 9" - Aqua with White Specks	Room B - 014	3% Chrysotile	No	No	7,600 sf
MEC-HSA-041	COM-093	Floor Tile - 12" x 12" - White with Black Dots	Room B - 805	None Detected	No	No	
MEC-HSA-042	COM-028	White Mastic on Fiberglass Duct Insulation	Room 7019	6% Chrysotile	No	No	45,860 sf
MEC-HSA-042	COM-039	White Mastic on Fiberglass Duct Insulation	Fourth Floor - Central East Corridor outside of Room 4029 C	7% Chrysotile	No	No	45,860 sf

Prepared By: *[Signature]*
 Reviewed By: *[Signature]*

Department of Commerce
 Asbestos-Containing Building Materials Summary
 DC0013ZZ

HSA No.	Macter Sample No.	Material Sampled	Sample Location	Analytical Result	Regulated ACM	Friable	Approximate Quantity Observed
MEC-HSA-043	COM-084	Floor Tile - 9" x 9" - Lime Green with White Streaks	Sixth Floor Snack Bar #57	2% Chrysotile	No	No	2,800 sf
MEC-HSA-043	COM-084	Floor Tile - 9" x 9" - Lime Green with White Streaks	Room B - 212	5% Chrysotile	No	No	2,800 sf
MEC-HSA-044	COM-094	Floor Tile - 12" x 12" - Multishade Beige Pattern	Room Adjacent to B - 805	None Detected	No	No	
MEC-HSA-045	COM-098	Floor Tile - 12" x 12" - Greenish Beige with White Streaks	Sixth Floor - Snack Bar # 57	3% Chrysotile	No	No	900 sf
MEC-HSA-046	COM-098	Black Duct Mastic on Fiberglass Duct Insulation	Above Room B - 804	None Detected	No	No	
MEC-HSA-046	COM-120	Black Duct Mastic on Fiberglass Duct Insulation	Room 1410	None Detected	No	No	
MEC-HSA-047	COM-098	Floor Tile - 12" x 12" - Beige with White, Orange, and Blue Streaks	Sixth Floor - Snack Bar # 57	None Detected	No	No	
MEC-HSA-048	COM-099	Floor Tile - 12" x 12" - Blue with Gray Spots	Room B - 904	None Detected	No	No	
MEC-HSA-049	COM-101	Sheet Linoleum - Beige Diamond Shape	Room B - 902	None Detected	No	No	
MEC-HSA-050	COM-102	Ceiling Tile - 2' x 2' - Ribbed	Room B - 841B	None Detected	No	No	
MEC-HSA-051	COM-103	Floor Tile - 12" x 12" - Gray with White Streaks	Room B - 841B	None Detected	No	No	
MEC-HSA-052	COM-104	Corrugated Duct Insulation	Basement - Aquarium Corridor	25% Chrysotile	Yes	Yes	1620 sf
MEC-HSA-053	COM-105	Floor Tile - 12" x 12" - Brick Colored with White Streaks	Basement - Stairway 9	3% Chrysotile	No	No	50 sf
MEC-HSA-054	COM - 106	Brown Fibrous Duct Insulation	Central West Corridor - Freight Elevator Lobby	None Detected	No	No	
MEC-HSA-055	COM-107	Floor Tile - 12" x 12" - Off White with Black Streaks	Basement Mezzanine - Records Storage	5% Chrysotile	No	No	11,200 sf
MEC-HSA-056	COM-109	Floor Tile - 9" x 9" - Brown with Orange, Brown and White	Basement Mezzanine - Hallway outside BM - 24	3% Chrysotile	No	No	4,000 sf

Prepared By: 
 Reviewed By: 

Department of Commerce
 Asbestos-Containing Building Materials Summary
 DC0013ZZ



HSA No.	Mactec Sample No.	Material Sampled	Sample Location	Analytical Result	Regulated ACM	Friable	Approximate Quantity Observed
MEC-HSA-057	COM-111	Floor Tile - 9" x 9" - Yellowish with Brown Spots	Basement Mezzanine - Hallway outside BM - 25	3% Chrysotile	No	No	1,500 sf
MEC-HSA-058	COM-113	Floor Tile - 12" x 12" - Blue with White Specks	Sub Basement - Hallway outside SB702	None Detected	No	No	
MEC-HSA-059	COM-115	Floor Tile - 9" x 9" - beneath Floor Tile 9" x 9" - Tan	Seventh Floor - Corridor 2 near Stairway 3	15% Chrysotile	No	No	18,900 sf
MEC-HSA-060	COM-117	Tar Paper on Fiberglass Pipe Insulation	Second Floor - Courtyard 1	None Detected	No	No	
MEC-HSA-061	COM-113	Black Mastic on Metal Pipe	Second Floor - Courtyard 1	None Detected	No	No	
MEC-HSA-062	COM-119	Acoustical Ceiling Plaster	Second Floor - Central Mail Room	20% Chrysotile	Yes	Yes	9,000 sf
MEC-HSA-063	COM-121	Floor Tile - 12" x 12" - Tan with Brown and White Streaks	Room 1117	5% Chrysotile	No	No	4,000 sf
MEC-HSA-064	COM-123	Floor Tile - 12" x 12" - Black with White Spots	Room 1617	None Detected	No	No	
MEC-HSA-065	Assumed	Fire Doors	Doors on Stairways	Assumed	No	No	300 ea
MEC-HSA-066	Assumed	Magnesia Runs in the Wall	Restrooms, Under Perimeter Windows	Assumed	Yes	Yes	80,000 lf
MEC-HSA-067	Assumed	TSI - Magnesia Pipe Insulation <12" Diameter	Throughout the Building	Assumed	Yes	Yes	18,918 lf
MEC-HSA-068	Assumed	TSI - Aircell Pipe Insulation <12" Diameter	Throughout the Building	Assumed	Yes	Yes	325 lf
MEC-HSA-069	Assumed	TSI - Aircell Pipe Insulation >12" Diameter	Throughout the Building	Assumed	Yes	Yes	80 lf
MEC-HSA-070	Assumed	Transite Board	B014 and 2830B	Assumed	No	No	70 sf
MEC-HSA-071	Assumed	TSI - Magnesia Pipe Insulation > 12" Diameter	Attic - East Central	Assumed	No	Yes	125 lf
Previous Survey Data	Previous Survey Data	Brown floor covering underlayment	Child Day Care Center	12% Chrysotile	No	No	6,000 sf

Prepared By: *SM*
 Reviewed By: *PF*

MACTEC Engineering and Consulting, Inc.
22455 Davis Drive, Suite 100
Sterling, Virginia 20164
(703) 404 - 7000

Department of Commerce
Asbestos-Containing Building Materials Summary
DC0013ZZ

HSA No.	Mactac Sample No.	Material Sampled	Sample Location	Analytical Result	Regulated ACM	Friable	Approximate Quantity Observed
Previous Survey Data	Previous Survey Data	Black floor mastic adhesive	Child Day Care Center	7% Chrysotile	No	No	6,000 sf
Previous Survey Data	Previous Survey Data	Floor Tile - 12" x 12" - tan floor tile under non-asbestos gray floor tile	Child Day Care Center	15% Chrysotile	No	No	180 sf

Prepared By: 
Reviewed By: 

APPENDIX B

**Homogenous Sampling Area
Assessment Forms**

HJA-001
1062

ASBESTOS ASSESSMENT DATA FORM

BLDG NAME: Commerce Bldg. ASSESSMENT DATE: 1-14-03
ADDRESS: 14th & Constitution Ave.
GSA BLDG NO.: DC0013ZZ AMOUNT(S.F./L.F.): _____

Location In Bldg: Attic-Elev. Machine Rm. - Group 4
(include Functional Space)

HOMOGENEOUS AREA: Flex Duct Connector ~~HSA-001~~

Type of Material	Damage	Accessibility	
<input type="checkbox"/> Fireproofing	<input type="checkbox"/> Significant	<input type="checkbox"/> High	
<input type="checkbox"/> Acoustical Plaster	<input type="checkbox"/> Minor	<input type="checkbox"/> Medium	
<input type="checkbox"/> Acoustical Tile	<input checked="" type="checkbox"/> None	<input checked="" type="checkbox"/> Low	
<input type="checkbox"/> Thermal Systems Insulation		Air Plenum <u>N</u>	
<input type="checkbox"/> Vinyl Floor Tile		(Y or N)	
<input checked="" type="checkbox"/> Other: _____			
Friability	Traffic	Vibration	Potential for Air Erosion
<input type="checkbox"/> High	<input type="checkbox"/> High	<input checked="" type="checkbox"/> High	<input checked="" type="checkbox"/> High
<input type="checkbox"/> Medium	<input type="checkbox"/> Medium	<input type="checkbox"/> Medium	<input type="checkbox"/> Moderate
<input checked="" type="checkbox"/> Low	<input checked="" type="checkbox"/> Low	<input type="checkbox"/> Low	<input type="checkbox"/> Low

Comments: _____

AHERA Classification (see instructions): Ø

Sample Number	Sample location	Result
<u>6011403-001</u>	<u>Attic-Elev. Machine Rm Group 4</u>	<u>45% Chrysotile</u>

NOTE: Use one form per homogeneous area. Consult 40 CFR Part 763 for sampling and analytical protocols and definitions.

HSA-002

ASBESTOS ASSESSMENT DATA FORM

BLDG NAME: Commerce Bldg.
ADDRESS: 14th & Constitution Ave.
GSA BLDG NO.: DC0013ZZ

ASSESSMENT DATE: 1-14-03
AMOUNT(S.F./L.F.): [REDACTED]

Location in Bldg: Attic-Wing 3
(include Functional Space)

HOMOGENEOUS AREA: Pipe Hanger Pad on Fiberglass Pipe Insul.

Type of Material
 Fireproofing
 Acoustical Plaster
 Acoustical Tile
 Thermal Systems Insulation
 Vinyl Floor Tile
 Other: _____

Damage
 Significant
 Minor
 None

Accessibility
 High
 Medium
 Low

Air Plenum N
(Y or N)

Friability
 High
 Medium
 Low

Traffic
 High
 Medium
 Low

Vibration
 High
 Medium
 Low

Potential for Air Erosion
 High
 Moderate
 Low

Comments: _____

AHERA Classification (see instructions): 7

Sample Number	Sample location	Result
<u>011403-002</u>	<u>Attic-Wing 3</u>	<u>30% Chrysotile</u>
<u>-003</u>	<u>↓</u>	<u>30% Chrysotile</u>
<u>-004</u>	<u>Attic-Elev. Mach. Rm Group 4</u>	<u>30% Amosite</u>

NOTE: Use one form per homogeneous area. Consult 40 CFR Part 763 for sampling and analytical protocols and definitions.

HSA-003

ASBESTOS ASSESSMENT DATA FORM

BLDG NAME: Commerce Bldg.
ADDRESS: 14th & Constitution Ave.
GSA BLDG NO.: DC0013ZZ

ASSESSMENT DATE: 1-14-03
AMOUNT(S.F./L.F.): [REDACTED]

Location In Bldg: Attic-SW Corridor [REDACTED]
(include Functional Space)

HOMOGENEOUS AREA: Skimcoat Mud on Fiberglass Pipe Insulation

Type of Material
 Fireproofing
 Acoustical Plaster
 Acoustical Tile
 Thermal Systems Insulation
 Vinyl Floor Tile
 Other: _____

Damage
 Significant
 Minor
 None

Accessibility
 High
 Medium
 Low

Air Plenum N
(Y or N)

Friability
 High
 Medium
 Low

Traffic
 High
 Medium
 Low

Vibration
 High
 Medium
 Low

Potential for Air Erosion
 High
 Moderate
 Low

Comments: _____

AHERA Classification (see instructions): 7

Sample Number	Sample location	Result
0011403 -005	Attic-SW Corner	20% Chrysotile
-006	↓	None Detected
-007	Attic-Wing 2	None Detected

NOTE: Use one form per homogeneous area. Consult 40 CFR Part 763 for sampling and analytical protocols and definitions.

HSA-004

1062

ASBESTOS ASSESSMENT DATA FORM

BLDG NAME: Commerce Bldg.
ADDRESS: 14th & Constitution Ave.
GSA BLDG NO.: DC0013ZZ

ASSESSMENT DATE: 1-14-03
AMOUNT(S.F./L.F.): _____

Location In Bldg: Attic - East Central Corridor
(include Functional Space)



HOMOGENEOUS AREA: 12x12 White FT with Green Spots

Type of Material:
 Fireproofing
 Acoustical Plaster
 Acoustical Tile
 Thermal Systems Insulation
 Vinyl Floor Tile
 Other: _____

Damage
 Significant
 Minor
 None

Accessibility
 High
 Medium
 Low

Air Plenum N
(Y or N)

Friability
 High
 Medium
 Low

Traffic
 High
 Medium
 Low

Vibration
 High
 Medium
 Low

Potential for Air Erosion
 High
 Moderate
 Low

Comments: _____

AHERA Classification (see instructions): NON-FRIABLE

Sample Number	Sample location	Result
<u>1011403-008</u>	<u>Attic - East Cent. Cor.</u>	<u>None Detected 50% Chrysotile</u>

NOTE: Use one form per homogeneous area. Consult 40 CFR Part 763 for sampling and analytical protocols and definitions.

HSA-005
1 0630

ASBESTOS ASSESSMENT DATA FORM

BLDG NAME: Commerce Bldg ASSESSMENT DATE: 1-14-03
ADDRESS: 14th & Constitution Ave.
GSA BLDG NO.: DC0013ZZ AMOUNT(S.F./L.F.) _____

Location In Bldg: Attic-East Central Cor. ~~HSA-005~~
(include Functional Space)

HOMOGENEOUS AREA: Mastic-Black

Type of Material	Damage	Accessibility
<input type="checkbox"/> Fireproofing	<input type="checkbox"/> Significant	<input type="checkbox"/> High
<input type="checkbox"/> Acoustical Plaster	<input type="checkbox"/> Minor	<input type="checkbox"/> Medium
<input type="checkbox"/> Acoustical Tile	<input checked="" type="checkbox"/> None	<input checked="" type="checkbox"/> Low
<input type="checkbox"/> Thermal Systems Insulation		
<input type="checkbox"/> Vinyl Floor Tile		Air Plenum _____ (Y or N)
<input checked="" type="checkbox"/> Other: _____		

Friability	Traffic	Vibration	Potential for Air Erosion
<input type="checkbox"/> High	<input type="checkbox"/> High	<input type="checkbox"/> High	<input type="checkbox"/> High
<input type="checkbox"/> Medium	<input checked="" type="checkbox"/> Medium	<input type="checkbox"/> Medium	<input type="checkbox"/> Moderate
<input checked="" type="checkbox"/> Low	<input type="checkbox"/> Low	<input checked="" type="checkbox"/> Low	<input checked="" type="checkbox"/> Low

Comments: _____

AHERA Classification (see instructions): Non-friable

Sample Number	Sample location	Result
(Include percent and type of asbestos in result, e.g. 50% Chrysotile).		
<u>011403-009</u>	<u>Attic-East Cent. Cor.</u>	<u>None Detected</u>
<u>-024</u>	<u>Attic East Central Corridor</u>	<u>None Detected</u>
<u>-041</u>	<u>4035</u>	<u>7% Chrysotile</u>
<u>-043</u>	<u>3099C</u>	<u>8% Chrysotile</u>
<u>-053</u>	<u>Room 6029B</u>	<u>2% Chrysotile</u>
<u>-50</u>	<u>6043</u>	<u>None Detected</u>
<u>-58</u>	<u>6043</u>	<u>None detected</u>
<u>-62</u>	<u>6701</u>	<u>None Detected</u>
<u>-65</u>	<u>1st floor Snack Bar</u>	<u>None Detected</u>

NOTE: Use one form per homogeneous area. Consult 40 CFR Part 763 for sampling and analytical protocols and definitions.

HSA 005
2 of 30

Continued

ASBESTOS ASSESSMENT DATA FORM

BLDG NAME: Commerce Bldg. ASSESSMENT DATE: 2/24/03
 ADDRESS: 14th & Constitution Ave.
 GSA BLDG NO.: DC0013ZZ AMOUNT(S.F./L.F.): _____
 Location In Bldg: 5th floor Stairway #9
 (include Functional Space)

HOMOGENEOUS AREA: Black Mastic ~~on~~ on Floor Tile

Type of Material	Damage	Accessibility
<input type="checkbox"/> Fireproofing	<input type="checkbox"/> Significant	<input checked="" type="checkbox"/> High
<input type="checkbox"/> Acoustical Plaster	<input type="checkbox"/> Minor	<input type="checkbox"/> Medium
<input type="checkbox"/> Acoustical Tile	<input checked="" type="checkbox"/> None	<input checked="" type="checkbox"/> Low
<input type="checkbox"/> Thermal Systems Insulation		Air Plenum <u>N</u>
<input type="checkbox"/> Vinyl Floor Tile		(Y or N)
<input checked="" type="checkbox"/> Other: _____		

Friability	Traffic	Vibration	Potential for Air Erosion
<input type="checkbox"/> High	<input checked="" type="checkbox"/> High	<input type="checkbox"/> High	<input type="checkbox"/> High
<input type="checkbox"/> Medium	<input checked="" type="checkbox"/> Medium	<input type="checkbox"/> Medium	<input type="checkbox"/> Moderate
<input checked="" type="checkbox"/> Low	<input type="checkbox"/> Low	<input checked="" type="checkbox"/> Low	<input checked="" type="checkbox"/> Low

Comments: _____

AHERA Classification (see instructions): _____

<u>Sample Number</u>	<u>Sample location</u>	<u>Result</u>
COM-075	5th floor Stairway #9	None Detected
COM-081	Rm B220A	None Detected
COM-083	Printing Break Room	None Detected
COM-085	B-012	None Detected
COM-088	B-014	None Detected
COM-090	B212	None Detected
COM-100	B-904	None Detected
0109	Snack Bar #57 ^{6th} floor	None Detected
116	7th floor wing 2 corridor near stair #3	None Detected

NOTE: Use one form per homogeneous area. Consult 40 CFR Part 763 for sampling and analytical protocols and definitions.

HSA 005
3 of 30
Continued

ASBESTOS ASSESSMENT DATA FORM

BLDG NAME: Commerce Bldg ASSESSMENT DATE: 3/07/03
 ADDRESS: 14th & Constitution Ave.
 GSA BLDG NO.: DC0013ZZ AMOUNT(S.F./L.F.) _____

Location In Bldg: 1117
 (include Functional Space)

HOMOGENEOUS AREA: Black Mastic

Type of Material	Damage	Accessibility
<input type="checkbox"/> Fireproofing	<input type="checkbox"/> Significant	<input type="checkbox"/> High
<input type="checkbox"/> Acoustical Plaster	<input type="checkbox"/> Minor	<input type="checkbox"/> Medium
<input type="checkbox"/> Acoustical Tile	<input checked="" type="checkbox"/> None	<input checked="" type="checkbox"/> Low
<input type="checkbox"/> Thermal Systems Insulation		Air Plenum ^N
<input type="checkbox"/> Vinyl Floor Tile		(Y or N)
<input checked="" type="checkbox"/> Other: _____		

Friability	Traffic	Vibration	Potential for Air Erosion
<input type="checkbox"/> High	<input checked="" type="checkbox"/> High	<input type="checkbox"/> High	<input type="checkbox"/> High
<input type="checkbox"/> Medium	<input checked="" type="checkbox"/> Medium	<input type="checkbox"/> Medium	<input type="checkbox"/> Moderate
<input checked="" type="checkbox"/> Low	<input type="checkbox"/> Low	<input checked="" type="checkbox"/> Low	<input checked="" type="checkbox"/> Low

Comments: _____

AHERA Classification (see instructions): _____

Sample Number	Sample location	Result
(Include percent and type of asbestos in result, e.g. 50% Chrysotile).		
122	1117	None Detected
124	1117	None Detected
108	Basement mezzanine Records Storage	None Detected
110	Basement mezzanine Hallway outside BM 24	6% Chrysotile
112	Basement mezzanine Hallway outside BM 25	None Detected
114	Subbasement Hallway outside SB702	None Detected

NOTE: Use one form per homogeneous area. Consult 40 CFR Part 763 for sampling and analytical protocols and definitions.

ASBESTOS ASSESSMENT DATA FORM - CONTINUED

OMOGENOUS AREA Black Mastic

DING: Commerce Building

LOCATION	APPROX. QUANTITY	CONDITION	NOTES
811	1600 SF	G	
814A	1600 SF	G	
820	1200 SF	G	
821	1200 SF	G	
325	1000 SF	G	
1824	300 SF	G	
1875	1000 SF	G	
1876	1000 SF	G	
1521	400 JF	G	
1517	1200 JF	G	
511	400 JF	G	
1516	2000 SF	G	
5th Floor Stairway #9	50 SF	G	
5413	1500 SF	G	
5414	1400 SF	G	
5412	1200 SF	G	
5422	1000 SF	G	
5425	400 SF	G	
5312	1200 SF	G	
5321	1600 SF	G	
5324	1600 SF	G	
5327	800 SF	G	

ASBESTOS ASSESSMENT DATA FORM - CONTINUED

HOMOGENOUS AREA Black Mastic

BUILDING: Commerce Building

LOCATION	APPROX. QUANTITY	CONDITION	NOTES
589D	1000 SF	G	
5889	400 SF	G	
5886C	1000 SF	G	
5886	1400 SF	G	
883	1300 SF	G	
618	1000 SF	G	
611	400 SF	G	
5012	1000 SF	G	
5217	2000 SF	G	
5224	1400 SF	G	
230	900 SF	G	
5102	500 SF	G	
5104	400 SF	G	
5108	1200 SF	G	
711	1400 SF	G	
118	1200 SF	G	
5119	800 SF	G	
5128	2000 SF	G	
5 TH Floor Corridor 1	1600 SF	G	
5804	1400 SF	G	
5805	800 SF	G	
5810	1200 SF	G	

ASBESTOS ASSESSMENT DATA FORM - CONTINUEDHOMOGENOUS AREA Black MasticBUILDING: Commerce Building

LOCATION	APPROX. QUANTITY	CONDITION	NOTES
5083	800 SF	G	
5087	800 SF	G	
5086	1000 SF	G	
5093	2500 SF	G	
5092	1000 SF	G	
5098	400 SF	G	
5099C	1000 SF	G	
701A	800 SF	G	
705	400 SF	G	
5706	900 SF	G	
5709	800 SF	G	
711	800 SF	G	
712	800 SF	G	
716	1500 SF	G	
717	1200 SF	G	
5721	800 SF	G	
727	1200 SF	G	
733	800 SF	G	
58980	1400 SF	G	
5897	1000 SF	G	
5896	1200 SF	G	
5893	1000 SF	G	

ASBESTOS ASSESSMENT DATA FORM - CONTINUED

HOMOGENOUS AREA Black IvisticBUILDING: Commerce Building

LOCATION	APPROX. QUANTITY	CONDITION	NOTES
4053	2000 SF	G	
4054	2000 SF	G	
5001	800 SF	G	
5005	3000 SF	G	
5004	1600 SF	G	
5019	1000 SF	G	
5016	800 SF	G	
5020	800 SF	G	
5023	400 SF	G	
5027	1200 SF	G	
5026	1200 SF	G	
5029B	1500 SF	G	
5039	1000 SF	G	
5040	2000 SF	G	
5045	800 SF	G	
5053	2000 SF	G	
5063	1000 SF	G	
5067	400 SF	G	
5071	1000 SF	G	
5075	1200 SF	G	
5080	800 SF	G	
5083	800 SF	G	

ASBESTOS ASSESSMENT DATA FORM - CONTINUEDHOMOGENOUS AREA Black MasticBUILDING: Commerce Building

LOCATION	APPROX. QUANTITY	CONDITION	NOTES
4801	300SF	G	
4800B	1000SF	G	
4800	1000SF	G	
1 TH Floor Southwest Corridor	1200SF	G	
1 TH Floor Southeast Corridor	1200SF	G	
1 TH Floor Corridor 1	1800SF	G	
4130	800SF	G	
4120	1500SF	G	
4119	800SF	G	
4112	1500SF	G	
4113	800SF	G	
4109	400SF	G	
4102	1200SF	G	
4024	800SF	G	
4023	300SF	G	
4025	300SF	G	
4027	300SF	G	
4029A	500SF	G	
4029B	800SF	G	
4035	600SF	G	
4039	600SF	G	
4036	1500SF	G	

ASBESTOS ASSESSMENT DATA FORM - CONTINUED

ISOGENOUS AREA Black Mastic

DING: Commercial Building

LOCATION	APPROX. QUANTITY	CONDITION	NOTES
357	300SF	G	
358	600SF	G	
3510	1600SF	G	
358	900SF	G	
4001	1000SF	G	
4003	1000SF	G	
4008	1600SF	G	
4009	900SF	G	
4012	600SF	G	
4015	600SF	G	
4015C	600SF	G	
4203	600SF	G	
4017	300SF	G	
4019	300SF	G	
4021	300SF	G	
4020	1000SF	G	
4227	300SF	G	
4226	800SF	G	
4821	1000SF	G	
4820	1600SF	G	
4813	1000SF	G	
4814	1300SF	G	

ASBESTOS ASSESSMENT DATA FORM - CONTINUEDHOMOGENOUS AREA Black MasticBUILDING: Commerce Building

LOCATION	APPROX. QUANTITY	CONDITION	NOTES
3849	400SF	G	
3845	200SF	G	
3832	200SF	G	
3826	900SF	G	
3827	900SF	G	
3327	1000SF	G	
3324	900SF	G	
3519	1500SF	G	
3320	600SF	G	
3316	600SF	G	
3413	600SF	G	
3412	1500SF	G	
3415	300SF	G	
3421	900SF	G	
3420	300SF	G	
3424	900SF	G	
3427	900SF	G	
3527	300SF	G	
3525	300SF	G	
3523	300SF	G	
3521	300SF	G	
3519	300SF	G	

ASBESTOS ASSESSMENT DATA FORM - CONTINUEDHOMOGENOUS AREA Black MasticDING: Commerce Building

LOCATION	APPROX. QUANTITY	CONDITION	NOTES
3802	1600 SF	G	
3810	1200 SF	G	
3814 B	1000 SF	G	
3805	1200 SF	G	
3818	1000 SF	G	
5215	2500 SF	G	
3224	1000 SF	G	
3819 3025	300 SF	G	
3029	600 SF	G	
3029 B	800 SF	G	
3033	600 SF	G	
3037	300 SF	G	
3038	2000 SF	G	
3043	1500 SF	G	
3051	900 SF	G	
3055	300 SF	G	
3058	300 SF	G	
3061	300 SF	G	
3060	300 SF	G	
3065	600 SF	G	
3063	300 SF	G	
3064	600 SF	G	

ASBESTOS ASSESSMENT DATA FORM - CONTINUEDHOMOGENOUS AREA Black MasticBUILDING: Commerce Building

LOCATION	APPROX. QUANTITY	CONDITION	NOTES
3099B	1000SF	G	
3707	800SF	G	
3708	2200SF	G	
3713	1000SF	G	
3721	2000SF	G	
3898C	2000SF	G	
3899C	300SF	G	
3897	1000SF	G	
3889	800SF	G	
3886C	1500SF	G	
3882	600SF	G	
3883	1000SF	G	
3023	600SF	G	
3018	600SF	G	
3878	1000SF	G	
3877	600SF	G	
3875	300SF	G	
3868A	2000SF	G	
3867	300SF	G	
3863	1000SF	G	
3862	3500SF	G	
3855	1400SF	G	