



Office of Audits  
Office of Inspector General  
U.S. General Services Administration

# PBS's Identification and Management of Environmental Risks Need Improvement

*Report Number A130131/P/R/R15003  
March 20, 2015*



Office of Audits  
Office of Inspector General  
U.S. General Services Administration

## REPORT ABSTRACT

### OBJECTIVE

The objective of our audit was to determine whether or not the Public Buildings Service (PBS) has the appropriate procedures in place to identify, quantify, and manage environmental contamination in accordance with government orders, laws, and PBS guidance. If not, determine whether PBS facilities, tenants, and/or the surrounding environment are at risk.

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Room 5215  
Washington, DC 20405  
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### **PBS's Identification and Management of Environmental Risks Need Improvement**

*A130131/P/R/R15003  
March 20, 2015*

#### **WHAT WE FOUND**

We identified the following during our audit:

Finding 1 – PBS Central Office currently does not have a system in place to effectively monitor environmental management risks.

Finding 2 – PBS has not conducted environmental compliance audits on its entire owned building inventory, and lacks policy and guidance for the audits.

Finding 3 – PBS does not have consistent environmental management practices across PBS regional offices.

Finding 4 – Environmental management responsibility in tenant space is unclear.

#### **WHAT WE RECOMMEND**

Based on our audit findings we recommend that the PBS Commissioner:

1. Develop a system or framework to collect environmental risk data for PBS buildings and facilities to enable the Environmental Division and regional management to manage and report on environmental risks and liabilities.
2. Ensure that environmental compliance audits or equivalent surveys are conducted to identify risk factors for each PBS facility and are updated as needed; and establish policies to ensure the environmental compliance audits or surveys are consistent across the regions and findings are addressed.
3. Establish and enforce consistent environmental management practices across the regions.
4. Incorporate environmental management responsibilities into tenant occupancy agreements, particularly in cases where the tenant's activities pose a greater risk to the environment.

#### **MANAGEMENT COMMENTS**

The PBS Commissioner concurred with our findings and recommendations. Management's written comments to the draft report are included in their entirety as **Appendix B**.




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**Office of Audits  
Office of Inspector General  
U.S. General Services Administration**

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DATE: March 20, 2015

TO: Norman Dong  
Commissioner, Public Buildings Service (P)

FROM: Susan P. Hall   
Audit Manager, Program Audit Office (JA-R)

SUBJECT: PBS's Identification and Management of Environmental Risks  
Need Improvement  
*Report Number A130131/P/R/R15003*

This report presents the results of our audit of PBS's Environmental Management Program. Our findings and recommendations are summarized in the Report Abstract. Instructions regarding the audit resolution process can be found in the email that transmitted this report.

Your written comments to the draft report are included in **Appendix B** of this report.

If you have any questions regarding this report, please contact me or any member of the audit team at the following:

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On behalf of the audit team, I would like to thank you and your staff for your assistance during this audit.

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## Introduction

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PBS is responsible for the design, construction, operation, maintenance, and disposal of federal government buildings, and owns over 1,500 properties across 11 regions nationwide. PBS's goal is to provide superior workplaces for federal employees across the United States and minimize all damage to the environment from its operations. The Environmental Management Program within PBS's Office of Facilities Management and Services Programs supports GSA in maintaining compliance with environmental laws and regulations, minimizing environmental risk and liability, and promoting cost-effective environmental policies to meet PBS's performance goals.

The Office of Inspector General (OIG) has previously reported on GSA's environmental management programs.<sup>1</sup> These audits found that: PBS's Central Office needs to play a stronger role in implementing environmental program initiatives; improvements to environmental policies and procedures are needed; and written agreements are needed to ensure that tenants clearly understand their responsibilities regarding environmental hazards.

The OIG also reviewed the environmental conditions at the Bannister Federal Complex in Kansas City, Missouri (the Complex).<sup>2</sup> A United States Senator requested the review after numerous news reports about health concerns of current and former occupants of the Complex. These reports stated that the Complex has a history of known health hazards related to exposure to contaminants including lead and polychlorinated biphenyls (PCBs), and that such exposure may have resulted in illnesses and even the deaths of some of the occupants of the Complex. The OIG found that PBS took substantial steps to protect the health of the Complex's occupants in response to the news reports. However, prior to the news reports, PBS did not have a strong environmental management program for the Complex, despite the building's history of known health hazards. PBS personnel did not have a clear understanding of environmental responsibilities pertaining to the GSA-controlled portion of the Complex and did not adequately document or maintain files related to health and safety conditions at the Complex.

### Objective

The objective of our audit was to determine whether or not PBS has the appropriate procedures in place to identify, quantify, and manage environmental contamination in accordance with government orders, laws, and PBS guidance. If not, determine whether PBS facilities, tenants, and/or the surrounding environment are at risk.

See **Appendix A** - Purpose, Scope, and Methodology for additional details.

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<sup>1</sup>*Audit of PBS' Environmental Management Program*, Report Number A995196/P/H/R00008, dated February 16, 2000; and *Review of the PBS Environment Program Management*, Report Number A050040/P/4/R06003, dated March 28, 2006.

<sup>2</sup>*Review of Health and Safety Conditions at the Bannister Federal Complex, Kansas City, Missouri*, Report Number A100116/P/6/R11001, dated November 8, 2010.

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## Results

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PBS lacks the procedures to sufficiently identify, quantify, and manage environmental contamination in accordance with government orders, laws, and PBS guidance. As a result, PBS facilities, tenants, and the surrounding environment are potentially at risk. Specifically, PBS lacks a system to effectively monitor environmental management risks nationwide. In addition, PBS has not conducted environmental compliance audits on its entire building inventory, and lacks policy and guidance to ensure audit consistency and effectiveness. Environmental management practices are also inconsistent across the PBS regions due to a lack of centralized policy. Finally, environmental management responsibility in tenant space is unclear, which can lead to undetected risks.

### **Finding 1 – PBS Central Office currently does not have a system in place to effectively monitor environmental management risks.**

The PBS Central Office Environmental Division (Environmental Division) lacks the data necessary to fulfill its responsibility to support GSA in maintaining compliance with environmental laws and regulations, and minimizing environmental risks and liabilities. The Environmental Division does not have a centralized database to capture environmental data, leaving PBS unaware of environmental risks associated with buildings in its inventory. With no centralized database, it is difficult for PBS to identify and address systemic environmental issues across the nation.

PBS previously used the Environmental Risk Index to store environmental information. PBS decommissioned this database in 2012 and has not replaced it. The PBS Inventory Reporting Information System (IRIS) has the capability to store environmental data, such as the results of environmental compliance audits.<sup>3</sup> Although more than half of the PBS regions use IRIS for tracking compliance audit findings and recommendations,<sup>4</sup> it is not user-friendly and does not support consistent sharing of environmental information across the regions.

PBS regions maintain environmental information, but it is not easily accessible to the Environmental Division. Methods for storing and reporting environmental data differ across the regions. Specifically, one region effectively used a cloud storage site to house environmental data. Information in the cloud storage site can be made available to anyone within PBS needing access, including the Environmental Division. Another region used IRIS and noted both its capabilities and limitations. A third region used a regional network drive; however the Environmental Division does not have access to

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<sup>3</sup> Environmental compliance audits are completed to ensure that federal buildings comply with federal, state, and local environmental laws and regulations. They also serve to develop an awareness of environmental compliance criteria, evaluate the effectiveness of current management systems in place, and improve environmental performance at facilities.

<sup>4</sup> We conducted detailed fieldwork in the New England, Northeast and Caribbean, and Mid-Atlantic Regions. We also performed a limited survey of environmental management processes in GSA's remaining eight regions.

this information. These various storage and maintenance methods are not conducive to nationwide data management.

Additionally, the environmental data the regions regularly submit to the Environmental Division is limited. The majority of regions mentioned only regularly submitting environmental liabilities data to the Environmental Division.<sup>5</sup> Other information, including data on environmental risk factors, is typically sent as a result of the Environmental Division's data calls.

We reviewed PBS's management of five environmental risk factors: asbestos, lead, radon, hazardous materials,<sup>6</sup> and storage tanks. Currently, the Environmental Division regularly collects storage tank and asbestos data from the regions. However, it is not monitoring or collecting data on lead, radon, or hazardous materials.

PBS's efforts to collect data on its storage tank inventory nationwide expanded during our audit. The Environmental Division did not have confidence in the accuracy of the storage tank data initially provided to the audit team. Therefore, PBS recently developed a comprehensive set of data fields for monitoring its storage tank inventory; including identification, operational, maintenance, and training-related data. This data is not yet complete. Tank installation dates, tank ownership, and tank operating statuses are not known for the entire storage tank inventory.<sup>7</sup> However, the Environmental Division is continually monitoring and validating the storage tank information it receives from the regions.

Having sufficient, readily accessible information on key risk factors would improve the Environmental Division's ability to quickly respond to environmental concerns and minimize environmental risks and liabilities nationwide.

### Recommendation 1

We recommend that the PBS Commissioner develop a system or framework to collect environmental risk data for PBS buildings and facilities to enable the Environmental Division and regional management to manage and report on environmental risks and liabilities.

### Management Comments

The PBS Commissioner concurred with our finding and recommendation. Management's written comments to the draft report are included in their entirety as **Appendix B**.

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<sup>5</sup> Environmental liabilities data is consolidated by Central Office and reported in GSA's annual financial statement.

<sup>6</sup> Per PBS's *Hazardous Waste Technical Guide*, hazardous materials include hazardous waste from household cleaners, pesticides, paints, solvents, copier toner, and fluorescent bulbs with PCB ballast. Other PCB-containing items were also considered hazardous materials for the purposes of this audit.

<sup>7</sup> Storage tank operating statuses include: active, inactive, abandoned in place, removed, closed, and transferred ownership.

## **Finding 2 – PBS has not conducted environmental compliance audits on its entire owned building inventory, and lacks policy and guidance for the audits.**

Compliance audits are an effective tool for identifying environmental risks. However, PBS has not completed environmental compliance audits (compliance audits) on its entire owned building inventory. This leaves some buildings, tenants, and the environment vulnerable to potentially adverse impacts.

We conducted detailed reviews of a sample of 20 PBS owned buildings in three regions. Each building in our sample had a compliance audit conducted by an environmental consulting services contractor or outside agency. In fact, information provided by the sample regions' personnel indicates compliance audits were conducted on all buildings in their inventories. However, a survey of the regions not included in our sample revealed that compliance audits were not conducted consistently across the regions. For example:

- One region conducted compliance audits on nearly its entire building inventory but conducted the audits using regional staff.
- Two regions conducted compliance audits, or some variation of compliance audits, on a portion of its buildings.
- Two regions conducted Safety Environmental Management Surveys<sup>8</sup> in lieu of compliance audits but had not conducted the surveys on the entire building inventory.
- Two regions conducted Management Analysis Review Systems<sup>9</sup> reviews in lieu of compliance audits. Both of the regions completed reviews on their entire building inventory.
- One region had not conducted a compliance audit on any of its buildings.

There were differences in the scope and classification of findings in the compliance audits in our sample regions, depending on the contractor completing the audits. For instance, in one region the contractor performing compliance audits defined Category 1 findings as those that posed harm to human health and the environment.<sup>10</sup> In this region, none of the eight compliance audits identified a Category 1 finding. In contrast, the contractor performing compliance audits in the two other sample regions expanded the definition of a Category 1 finding to include those risks that could lead to increased operating costs, administrative penalties, loss of revenue, and disposal and clean-up costs. The 12 compliance audits in the two regions with an expanded Category 1 definition identified 64 Category 1 findings.

The 20 compliance audits found 248 instances of non-compliance with federal, state, and local environmental laws and regulations. Twenty-six percent of these 248

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<sup>8</sup> Safety Environmental Management Surveys have an emphasis on fire safety, and address general employee safety issues.

<sup>9</sup> Management Analysis Review Systems are broad internal reviews of property management operations, with environmental, health, and safety being only one of 14 different components.

<sup>10</sup> Compliance audit findings are classified by category, with Category 1 being the highest risk.



instances are attributable to the expanded Category 1 findings mentioned above, and present the potential for adverse impacts to human health or the environment. For example, one compliance audit reported the improper maintenance and recordkeeping of a 10,000 gallon underground storage tank. The underground storage tank had a broken cap for the tank's fill port, tank maintenance was lacking, and recordkeeping was non-existent. These findings were not discovered until a compliance audit was conducted, and building management addressed these issues subsequent to the audit. By not conducting compliance audits on all buildings in its inventory, PBS is left vulnerable to risks the audits help to mitigate.

The detailed environmental audits included the following major regulatory and program areas: air quality; water quality; hazard communication plans; hazardous waste management; trash and recycling; underground storage tanks; and PCBs, asbestos, and lead. The compliance audit teams verified testing of these areas and recommended corrective action when necessary.

Although compliance audits provide environmental management benefits to PBS buildings, PBS has no formal policy to ensure compliance audits are conducted consistently and used effectively. The Environmental Division suggests that each PBS owned building have a compliance audit completed every 5 years. However, this is not a formal policy and is often not being met. Regions are not required to conduct the audits nor take corrective action on the findings. Policy regulating the scope, frequency, and follow-up requirements for the audits is non-existent; leading to inconsistencies across the regions.

While it may not be practical for every PBS building to undergo a review as in-depth as a compliance audit, some form of review should be conducted to identify environmental issues and improve environmental performance. The development and distribution of risk-based policy and guidance would enhance the Environmental Division's ability to identify environmental risks. A nationwide policy for compliance audits would also enable the Environmental Division to identify risks that are pervasive across the regions.

### Recommendation 2

We recommend that the PBS Commissioner:

- a. Ensure that environmental compliance audits or equivalent surveys are conducted to identify risk factors for each PBS facility and are updated as needed.
- b. Establish policies to ensure the environmental compliance audits or surveys are consistent across the regions and findings are addressed.

### Management Comments

The PBS Commissioner concurred with our finding and recommendations. Management's written comments to the draft report are included in their entirety as **Appendix B**.

### **Finding 3 – PBS does not have consistent environmental management practices across PBS regional offices.**

Decentralization of the environmental management function, combined with the lack of oversight and formal policy from the Environmental Division, leads to inconsistent environmental management practices across the regions. Inconsistent practices can leave building tenants and the environment at risk.

PBS has limited formal policies to ensure environmental management practices and testing are consistent across the regions. Our detailed review of 20 PBS owned buildings revealed that environmental testing for contaminants such as lead, radon, and PCBs varied widely across our three sample regions. Monitoring and maintenance of fuel storage tanks and hazardous materials also differed across the regions. For example, one region performed building-wide radon tests while another region performed testing only in the childcare centers.<sup>11</sup> In addition, two regions conducted lead-based paint testing in all buildings constructed before 1978, while another region performed the tests only as a precursor for alteration work.<sup>12</sup> Lastly, hazard communication plans were on file for five of six buildings in one region, but only one of six buildings in another region.

A lack of policy to promote consistent environmental management practices makes it difficult to collect and analyze nationwide environmental data and identify environmental risk. Without formal policies, the Environmental Division's ability to effectively monitor and oversee PBS's environmental risks will continue to be complicated by regional inconsistencies.

#### Recommendation 3

We recommend that the PBS Commissioner establish and enforce consistent environmental management practices across the regions.

#### Management Comments

The PBS Commissioner concurred with our finding and recommendation. Management's written comments to the draft report are included in their entirety as **Appendix B**.

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<sup>11</sup> PBS issued formal radon policy during the course of this audit on April 17, 2014, *PBS FMSP Risk Management Division, Radon GSA Guidance*. The policy requires testing for radon in all childcare centers in accordance with state and national authorities; in all new federal buildings, after construction but before occupancy; and to serve as an initial baseline in existing federal buildings, when no prior results exist.

<sup>12</sup> The *Lead Based Paint Technical Guide 402-1001* specifies that lead-based paint testing is required wherever renovation projects may disturb affected surfaces. Further, test results revealing elevated lead levels require continuous monitoring.

#### **Finding 4 – Environmental management responsibility in tenant space is unclear.**

PBS's tenant occupancy agreements do not address tenant responsibilities for the management of environmental hazards.<sup>13</sup> The lack of such an agreement could lead to undetected and untreated environmental risks, particularly in secure tenant space that is not accessible to PBS.

Tenant occupancy agreements do not assign responsibility for the management and remediation of environmental contaminants resulting from tenant operations or for ultimate restoration of the space. This has resulted in problems with environmental building management and restoration. Two firing ranges located in a federal building in New York have remained closed since 2011. PBS and the tenants continue to disagree on the responsibility of funding the restoration of the space. As a result, the firing ranges have remained locked and unused since their closure. Additionally, a 2007 compliance audit of the building found that one tenant had not properly maintained its firing range for several years. The compliance audit also found a tenant had been improperly disposing silver bearing wastewater into the sanitary sewer system.

Furthermore, some tenant space is not readily accessible to PBS, hampering its ability to manage all of the environmental risks in its facilities. This is especially an issue with tenants such as the Federal Bureau of Investigation, the U.S. Marshals Service, or other law enforcement personnel. For example, PBS officials do not have access to the firing range or its inspection records at a Maryland courthouse. Firing range maintenance in the building is handled by the tenant, who contracts for cleaning and inspection of the firing range. However, PBS does not have access to the results of the inspections or the lead testing in the firing range. Thus, PBS cannot ensure that lead exposure levels in the firing range are in accordance with Occupational Safety and Health Administration regulations. Currently, occupancy agreements do not address responsibilities for environmental risks related to tenant activities in space where PBS does not have authorized access.

Tenants are bound to federal laws, the Federal Management Regulations, and their agency's environmental management policies and regulations. However, PBS should proactively define environmental management responsibilities and address access rights in its occupancy agreements to avoid any potential disputes and minimize risks. Tenants and the surrounding environment may be vulnerable to possible environmental contamination in space with unassigned environmental management responsibilities, particularly in space that PBS cannot access.

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<sup>13</sup> The Office of Inspector General reported this issue in two prior audit reports: *Audit of PBS' Environmental Management Program*, Report Number A995196/P/H/R00008, dated February 16, 2000; and *Review of the PBS Environment Program Management*, Report Number A050040/P/4/R06003, dated March 28, 2006.

#### Recommendation 4

We recommend that the PBS Commissioner incorporate environmental management responsibilities into tenant occupancy agreements, particularly in cases where the tenant's activities pose a greater risk to the environment.

#### Management Comments

The PBS Commissioner concurred with our finding and recommendation. Management's written comments to the draft report are included in their entirety as **Appendix B**.

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## **Conclusion**

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PBS lacks the procedures to sufficiently identify, quantify, and manage environmental contamination in accordance with government orders, laws, and PBS guidance. As a result, PBS facilities, tenants, and the surrounding environment are potentially at risk. Specifically:

- (1) PBS is not effectively monitoring environmental risks nationwide;
- (2) PBS is not conducting environmental compliance audits on all of its building inventory;
- (3) Environmental management inconsistencies exist across the regions; and
- (4) Written agreements are needed to ensure tenants clearly understand their environmental management responsibilities in PBS owned buildings.

These findings are consistent with those the OIG previously reported, dating back to February 2000. During the course of this audit, PBS issued formal radon policy and expanded its efforts to collect data on its storage tank inventory nationwide. PBS management also informed us of its intention to issue formal policy on several other environmental contaminants in the early months of 2015. However, to further improve the environmental management program, PBS needs to develop a framework to manage and report on environmental risks; ensure consistent identification and routine maintenance of risk factors at each PBS building; establish agency-wide policy for the risk factors selected; and incorporate environmental management responsibilities into occupancy agreements.

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## **Appendix A – Purpose, Scope, and Methodology**

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### **Purpose**

This audit of PBS's environmental management process was part of the OIG's Fiscal Year 2014 Audit Plan.

### **Scope and Methodology**

The audit covered PBS's environmental management processes and procedures in PBS Central Office, the Office of Facilities Management and Services Programs, and in the PBS regional offices. We conducted site visits in the New England, Northeast and Caribbean, and Mid-Atlantic Regions and performed detailed reviews on a sample of buildings in each region.<sup>14</sup> These reviews covered a number of environmental risk factors, including asbestos, lead, radon, hazardous materials, and storage tank maintenance.

To accomplish our objective, we:

- Interviewed PBS personnel in the Environmental Division of the Office of Facilities Management and Services Programs;
- Reviewed and analyzed environmental management laws, regulations, policies, and guidance from PBS, the Environmental Protection Agency, the Occupational Safety and Health Administration, and Executive Orders 13423 and 13514;<sup>15</sup>
- Interviewed PBS building management and building operations and maintenance contractors for a sample of 20 buildings in three regions;
- Reviewed prior audit reports and news articles on environmental management; and
- Performed a limited survey of all PBS regions to determine environmental management processes.

We conducted the audit between November 2013 and July 2014 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

### **Internal Controls**

We evaluated internal controls over PBS's environmental management process to the extent necessary to answer the audit objective. Related internal control issues are discussed in the context of the audit findings.

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<sup>14</sup> We reviewed eight buildings in the New England Region, and six buildings in both the Northeast and Caribbean and Mid-Atlantic Regions.

<sup>15</sup> Executive Order 13423, dated January 24, 2007, *Strengthening Federal Environmental, Energy, and Transportation Management*. Executive Order 13514, dated October 5, 2009, *Federal Leadership in Environmental, Energy, and Economic Performance*.


## Appendix B – Management Comments



GSA Public Buildings Service

MAR 10 2015

MEMORANDUM FOR MARISA A. ROINESTAD  
ASSOCIATE DEPUTY ASSISTANT INSPECTOR GENERAL  
FOR AUDITING PROGRAM AUDIT OFFICE (JA-R)

FROM: NORMAN DONG  
COMMISSIONER (P)  
PUBLIC BUILDINGS SERVICE 

SUBJECT: Draft Report: PBS's Identification and Management of  
Environmental Risks Need Improvement  
Report Number A130131

The Public Buildings Service (PBS) appreciates the opportunity to comment on the subject draft audit report and concurs with the draft report's findings and recommendations. The report recommends that PBS:

1. Develop a system or framework to collect environmental risk data for PBS buildings and facilities to enable the Environmental Division and regional management to manage and report on environmental risks and liabilities.
2. Ensure that environmental compliance audits or equivalent surveys are conducted to identify risk factors for each PBS facility and are updated as needed; and establish policies to ensure the environmental compliance audits or surveys are consistent across the regions and findings are addressed.
3. Establish and enforce consistent environmental management practices across the regions.
4. Incorporate environmental management responsibilities into tenant occupancy agreements, particularly in cases where the tenant's activities pose a greater risk to the environment.

The PBS Environmental Division previously identified the same weaknesses detailed in the audit, and is executing a number of actions that will strengthen the PBS environmental program while addressing the recommendations set forth in the audit report.

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## Appendix B – Management Comments (cont.)

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PBS has created and is currently field-testing a risk-based template for environmental compliance audits that will be mandatory for all regional offices to use beginning in fiscal year 2016. In support of this template, an Environmental Assessment module was implemented in January 2015 as part of PBS's Inventory Reporting Information System (IRIS). This new module will serve as the national data repository for all environmental compliance audits beginning in FY 2016. Further, the use of the Environmental Assessment module in IRIS will allow PBS to track and report on progress toward completing environmental compliance audits and close-out of any corrective actions identified during the audits.

Since not all GSA-owned buildings have received an environmental compliance audit on a regularly-occurring schedule, PBS must first obtain a baseline across the entire inventory of properties. In support of this goal, the PBS Environmental Division developed a risk-based list of all GSA-owned buildings that will be used to prioritize the order in which PBS conducts environmental compliance audits.

To further support PBS's knowledge of the environmental risks in its inventory, PBS added a new Environmental Liability section to the annual Physical Condition Survey beginning in FY 2015. This new section allows the reviewer to identify whether or not there is evidence of a spill or release of any chemical or other substance within or outside of the building. Data is reported quarterly through the existing Environmental Liability process. Inclusion of the Environmental Liability section into the Physical Condition Survey will result in 50% of all GSA-owned buildings assessed every year. The initial survey of all GSA-owned buildings will be complete by the end of FY2016.

In order to standardize and bring consistency to PBS's environmental management across the Nation, the PBS Environmental Division is introducing a number of new and revised policies in FY 2015 and FY 2016. These policies cover topics such as:

- Fuel storage tank management – planned issuance, 3<sup>rd</sup> quarter FY 2015
- Asbestos management – planned issuance, 3<sup>rd</sup> quarter FY 2015
- Occupational safety and health – planned issuance, 3<sup>rd</sup> quarter FY 2015
- Refrigerant use and disposal – planned issuance, 4<sup>th</sup> quarter FY 2015
- Indoor air quality – planned issuance, 1<sup>st</sup> quarter FY 2016
- Drinking water – planned issuance, 1<sup>st</sup> quarter FY 2016

To support these new or revised policies, the PBS Environmental Division is creating data gathering and reporting requirements that will enable PBS to track and document progress on implementing each policy. Additionally, training associated with the implementation of these policies is being developed.



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## **Appendix B – Management Comments (cont.)**

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In regard to PBS's awareness of how tenant activities impact GSA's environmental risks, in January 2015 PBS sent a letter that went to all GSA building tenants – targeting agencies with operations and maintenance delegations – that reminded them of their environmental compliance responsibilities for their activities within PBS space. This letter served as the first of several activities that PBS plans for FY 2015 and FY 2016 that will improve PBS's knowledge of tenant activities that can impact overall building environmental compliance. The PBS Environmental Division is developing standardized language that will be used within tenant Occupancy Agreements that will require tenant notifications to PBS of any hazardous materials use or storage, while also clearly defining financial responsibility for any required cleanup activities. Implementation in tenant Occupancy Agreements is planned for the beginning of October, 2015.

Should you or your staff have questions, please contact Nathan Smith on (202) 501-1116.

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## ***Appendix C – Report Distribution***

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Commissioner, PBS (P)

Deputy Commissioner, PBS (PD)

Chief of Staff, PBS (P)

Regional Administrator (1A, 2A, 3A)

Regional Commissioner, PBS, New England Region (1P)

Acting Regional Commissioner, PBS, Northeast and Caribbean Region (2P)

Regional Commissioner, PBS, Mid-Atlantic Region (3P)

Associate General Counsel, Real Property Division (LR)

Regional Counsel (LD1, LD2, LD3)

Assistant Commissioner, PBS, Office of Facilities Management and  
Services Program (PM)

Director, PBS, Facilities Management and  
Services Programs Division (1PM, 2PM, 3PM)

Chief Administrative Services Officer (H)

Branch Chief, GAO/IG Audit Response Branch (H1C)

Audit Liaison, PBS (BCP)

Audit Liaison, PBS, New England Region (BCPA)

Audit Liaison, PBS, Northeast and Caribbean Region (BCPA)

Audit Liaison, PBS, Mid-Atlantic Region (BCPA)

Assistant Inspector General for Auditing (JA)

Director, Audit Planning, Policy, and Operations Staff (JAO)