



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

Assessment of a Hotline Complaint: PBS Does Not Have Complete and Accurate Asbestos Information for the Herbert C. Hoover Building in Washington, D.C.

Memorandum Number A240070
October 31, 2024



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

October 31, 2024

TO: ELLIOT DOOMES
COMMISSIONER
PUBLIC BUILDINGS SERVICE (P)

FROM: R. NICHOLAS GOCO
ASSISTANT INSPECTOR GENERAL FOR AUDITING (JA)

SUBJECT: Assessment of a Hotline Complaint: PBS Does Not Have Complete and Accurate Asbestos Information for the Herbert C. Hoover Building in Washington, D.C.
Memorandum Number A240070

The purpose of this memorandum is to notify you that the Public Buildings Service (PBS) does not have complete and accurate asbestos information for the Herbert C. Hoover Federal Building (Hoover Building). Based on our assessment of a hotline complaint, previously unidentified damaged asbestos-containing material (ACM) was found in two of the building's mechanical rooms. We also found that PBS does not have complete asbestos inspection records for the building.

BACKGROUND

Asbestos regulatory restrictions began in the 1970s, when it was discovered that exposure to airborne asbestos fibers may cause cancer and lung damage. While asbestos is largely absent from new building products, it is still present in older building materials, such as thermal insulation, fire-rated materials, flooring, ceiling tiles, and surfacing materials.

PBS's asbestos management policy and guidance address the identification, communication, recordkeeping, monitoring, and overall management of ACM in federally owned buildings under the jurisdiction, custody, and control of GSA.¹

¹ GSA Order PBS 1000.1A, *Asbestos Management*; and the *Public Buildings Service Desk Guide for GSA Order PBS 1000.1A Asbestos Management*.

PBS delegated authority for the operations and maintenance of the Hoover Building to the U.S. Department of Commerce (Commerce Department)—the building’s primary tenant. In accordance with PBS’s *Standard Operating Procedure for Operation and Maintenance of Delegated Real Property*, issued in September 2022, the Commerce Department is responsible for the building’s asbestos management program. Accordingly, the Commerce Department is responsible for performing the asbestos inspections required under PBS’s asbestos management policy. It must also provide the results of the inspections to PBS for placement into PBS’s official repository for asbestos records, the Inventory Reporting Information System (IRIS).

U.S. Government Accountability Office Audit Report and Hotline Complaint

On March 4, 2024, the U.S. Government Accountability Office (GAO) issued an audit report on GSA’s oversight of asbestos management.² GAO found that nearly two-thirds of GSA buildings were out of compliance with PBS’s *Asbestos Management* policy. In response to GAO’s report, PBS is currently planning corrective actions designed to address gaps in its asbestos data. Among other things, PBS is developing plans to fund and complete missing asbestos inspections at GSA-owned buildings.

On March 8, 2024, our office received a hotline complaint alleging that damaged ACM was present in the mechanical rooms at the Hoover Building. To assess the complaint, we visited the Hoover Building on March 14, 2024. During our site visit, we observed all five mechanical rooms cited in the complaint. We also conducted interviews with Commerce Department personnel, the complainant, and PBS officials. Based on the results of our assessment, we substantiated portions of the complaint.

Because our assessment of the hotline complaint coincided with PBS’s planned corrective actions to address the GAO report, we are providing our results to PBS management for use in identifying missing inspections. We are also providing our results so that PBS has complete information on the presence and location of asbestos at the Hoover Building.

RESULTS

PBS Does Not Have Complete and Accurate Asbestos Information for the Hoover Building.

PBS does not have complete and accurate asbestos information for the Hoover Building. Based on our assessment of a hotline complaint, previously unidentified damaged ACM was found in two of the building’s mechanical rooms. We also found that PBS does not have complete asbestos inspection records for the building.

² *More Consistent Monitoring of Asbestos Could Improve Oversight* (GAO-24-106324, March 4, 2024).

Previously Unidentified Damaged ACM in Two Mechanical Rooms

Based on the hotline complaint and our inquiry, the Commerce Department tested samples from each of the five mechanical rooms listed in the hotline complaint. The tests found previously unidentified damaged ACM in two of the five mechanical rooms. Specifically, layers of damaged cement around pipes in mechanical rooms 5607 and 6607 (shown in *Figure 1* and *Figure 2* below) tested positive for asbestos.³

Figure 1. Damaged Asbestos-Containing Cement Pipe Wrapping in Mechanical Room 5607⁴

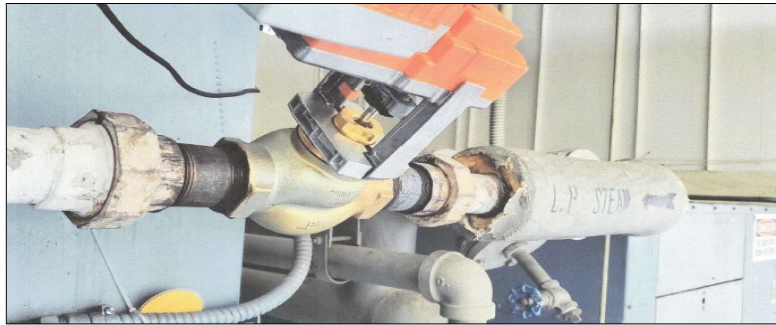


Figure 2. Damaged Asbestos-Containing Cement Pipe Wrapping in Mechanical Room 6607⁵



The Commerce Department’s asbestos program manager told us that “in-house” repairs were being scheduled to remediate the damaged ACM. The Commerce Department also conducted air quality testing for all five mechanical rooms identified in the hotline complaint. None of the results for any of the air quality testing resulted in findings that rose above the National

³ Asbestos was not detected in damaged materials in the remaining mechanical rooms (rooms 3724, 4724, and 6724).

⁴ Photograph was included in the hotline complaint.

⁵ Photograph taken by the GSA Office of Inspector General audit team on March 14, 2024.

Institute for Occupational Safety and Health (NIOSH) estimated limit of detection for asbestos fibers.^{6,7}

It is critical to know the location of asbestos to ensure that it is safely managed. Accordingly, it is important to ensure that the location of all ACM, including the previously unidentified ACM described above, is captured in PBS's asbestos inventory.

Asbestos Records for the Hoover Building Are Incomplete

PBS uses IRIS as its official asbestos records repository. Accordingly, IRIS must contain inspection records for all GSA-owned buildings, including delegated buildings. However, IRIS did not contain the inspection records described below.

- **Periodic Surveillance Inspections** – Periodic surveillance is a walk-through of the facility that focuses on noting any changes to the condition of ACM. This abbreviated re-inspection should be conducted annually or semiannually. Although the Commerce Department's asbestos program manager told us that he conducts periodic surveillance inspections at least twice per year, IRIS did not contain records for these inspections.
- **Inspections from 2011 and 2014** – In July 2018, a contractor hired by PBS performed a visual asbestos and operations and maintenance inspection of the Hoover Building. The contractor's report noted that inspections conducted in 2011 and 2014 found that a variety of mechanical areas throughout the building were assumed to be positive for ACM. Although the Commerce Department asbestos program manager provided us with portions of the 2011 inspection report, IRIS did not contain either inspection report.

Asbestos inspections are a key part of an effective asbestos management program because they describe both the location and condition of asbestos. Accordingly, it is important that all inspection reports, including the missing reports described above, are maintained in IRIS.

CONCLUSION

In sum, we found that PBS does not have complete and accurate asbestos information for the Hoover Building. To ensure that the asbestos at the Hoover Building is effectively managed, all asbestos information, including the information identified in this report, needs to be captured and maintained by PBS.

⁶ Air sample analyses were conducted on March 29, 2024, and April 10, 2024.

⁷ NIOSH *Manual of Analytical Methods*, 5th Edition, Method 7400, Issue 3 (June 14, 2019) sets an estimated limit of detection of 7 fibers per square millimeter of filter.

Compliance Statement

This memorandum complies with the Council of Inspectors General on Integrity and Efficiency's Quality Standards for Federal Offices of Inspector General.

Audit Team

This assignment was managed out of the Real Property Audit Office and conducted by the individuals listed below:

Byron G. Bustos	Associate Deputy Assistant Inspector General for Auditing
Meseret Henriques	Audit Manager
Barry Schintler	Auditor-In-Charge

Memorandum Distribution

GSA Administrator (A)

GSA Deputy Administrator (AD)

PBS Commissioner (P)

Acting Deputy Commissioner (P1)

Deputy Commissioner of Enterprise Strategy (P2)

PBS Regional Commissioner and Acting NCR Regional Administrator (WPX)

Acting Chief of Staff (PB)

Acting Deputy Chief of Staff (PB)

Chief Financial Officer (B)

Office of Audit Management and Accountability (BA)

Assistant Inspector General for Auditing (JA)

Deputy Assistant Inspector General for Acquisition Audits (JA)

Deputy Assistant Inspector General for Real Property Audits (JA)

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