



GSA Great Lakes Region

DATE: November 29, 2023

FROM: Mark A. McCready, Michigan Service Center Director, Northern Service Center
Operations Division
GSA Region 5 Public Buildings Service

TO: Operations and Maintenance Services, K'oyitl'ots'ina, Limited (K Corp)
Custodial Services, Americlean Janitorial Services Corp
General Services Administration (GSA)
Patrick V. McNamara Federal Building Tenant Agencies

CC: Angel Dizon, Regional Commissioner
Rob Green, Deputy Regional Commissioner
Michele Sharples, Director Northern Service Center Operations Division
William Renner, Director, Facilities Management Services Programs Division
Massiel Lucca Amador, Manager, Energy, Environmental, & Sustainability Branch
Thomas Hawkins, Regional Counsel
Robert Foltman, Regional Counsel

SUBJECT: Notification Concerning Lead, Copper, and Legionella Water Test Results

DocuSigned by:
Mark A. McCready
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In its commitment to providing safe and healthy workplaces for building occupants, the U.S. General Services Administration (GSA) is providing information regarding water testing results for the Patrick V. McNamara Federal Building located at 477 Michigan Avenue, in Detroit, MI.

Water sampling was performed on November 8, 2023 at 120 point-of-use locations in the facility, including hygiene showers, drinking fountains, and restroom sinks. GSA received preliminary results on November 21 that included results exceeding lead, copper, and Legionella thresholds.

Positive environmental sample results for Legionella bacteria indicate conditions that can cause Legionnaires' disease or Pontiac fever. As of today, there have been no reported cases of Legionnaires' disease or Pontiac fever associated with the facility. We are informing you about these test results and will implement additional precautionary measures aimed at minimizing potential exposure until the situation is fully resolved.

Initial laboratory results have identified the locations listed below exceeding the Environmental Protection Agency (EPA) and Centers for Disease Control and Prevention (CDC) thresholds of 15 parts per billion (ppb) for lead, 1,300 ppb for copper, and 1 CFU/mL for legionella:



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Location	Copper (ppb)	Lead (ppb)	Legionella (CFU/mL)	Legionella Species
Basement B105 Restroom	<1300	<15	2.8	serogroup 2-14
	<1300	<15	2	non pneumophila
Basement Holding Cell	1600	<15	16.8	serogroup 2-14
			30	non pneumophila
13th Floor Drinking Fountain 2E	<1300	<15	2.4	non pneumophila
19th Floor Women's Bathroom 3W	<1300	<15	2.8	non pneumophila
19th Floor Men's Bathroom 4M	<1300	<15	1.2	serogroup 2-14
			3.2	non pneumophila
20th Floor Women's Bathroom 3W	1500	<15	<1	
20th Floor Drinking Fountain 201	<1300	<15	2.4	non pneumophila
20th Floor 218	<1300	<15	3.6	non pneumophila
21st Floor Men's Bathroom 4M	<1300	<15	1.2	non pneumophila
21st Floor Women's Bathroom 3W	4500	<15	17.2	non pneumophila
26th Floor Women's Bathroom 3W	<1300	<15	1.2	non pneumophila
26th Floor 309	2400	<15	<1	
8th Floor 2C02	2800	<15	<1	
Mez Drinking Fountain	<1300	<15	12	non pneumophila
3rd Floor Q4 Room 328	<1300	<15	1.6	non pneumophila
3rd Floor Men's Bathroom Q1-1M	<1300	<15	8	non pneumophila
3rd Floor Women's Bathroom Q2-2W	<1300	<15	2.8	non pneumophila
4th Floor Q1 Room 2-5	2200	<15	<1	
4th Floor Q4 Room 2-S	5500	<15	<1	
4th Floor Men's Bathroom Q4-4M	<1300	<15	1.6	non pneumophila
4th Floor Women's Bathroom Q3-3W	<1300	<15	7.2	non pneumophila
5th Floor Q3-3C	<1300	<15	2	non pneumophila
Basement 104 Shower #2	<1300	26	<1	



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Location	Copper (ppb)	Lead (ppb)	Legionella (CFU/mL)	Legionella Species
17th Floor 212	2700	<15	<1	
18th Floor 020-H1	<1300	<15	2	non pneumophila
8th Floor 2C2E	<1300	21	14.8	non pneumophila
8th Floor 1C1E	<1300	<15	1.2	non pneumophila

In response to these findings, KCorp will be taking the following steps to address the water issues:

- Remove affected outlets from service (completed November 29)
 - For legionella: A sign was posted and the water was shut off at the fixture source. Where legionella was detected in bathrooms above 1 CFU/mL, the entire bathroom is restricted from use as alternate locations are readily available.
 - For lead and copper: Signs were posted at each of the above locations directing tenants not to use the water for drinking or cooking purposes.
- Remove and clean aerators at the affected outlets (in progress)
- Perform increased flushing at the affected outlets for three times per day for 30 minutes each time for an initial period of 5 days (in progress)
- Conduct free chlorine testing to ensure levels are within acceptable ranges (in progress)
- Conduct follow up testing (planned for December 8)
- Continue flushing until:
 - Legionella test results are received, analyzed, and Legionella concentrations are considered well controlled by the CDC (i.e., <1 CFU/mL).
 - Lead and copper concentrations are below 15 ppb and 1300 ppb, respectively.

The route of exposure for legionella is inhalation of a water droplet containing legionella. Exposure can also occur via aspiration of drinking water containing the bacteria. The CDC has provided GSA with clarification that the risk of exposure associated with the use of sinks for handwashing purposes is generally low. Since the outlets of concern have been removed from service until test results validate mitigation efforts reduced concentrations to below thresholds, the building will remain open.

According to the CDC, most healthy people, including children, exposed to Legionella do not get sick. People at increased risk of getting sick are:

- People 50 years or older
- Current or former smokers
- People with a chronic lung disease (like chronic obstructive pulmonary disease or emphysema)



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- People with weak immune systems or who take drugs that weaken the immune system (like after a transplant operation or chemotherapy)
- People with cancer
- People with underlying illnesses such as diabetes, kidney failure, or liver failure

If anyone begins to have symptoms of Legionnaires' disease within 14 days of being in the impacted areas or has additional medical concerns, they should see their physician. Additionally, please report any confirmed cases to GSA immediately.

According to the EPA, CDC, and Michigan Department of Health and Human Services (MDHHS), it is safe to use water exceeding the EPA action level for lead and copper for hand washing and bathing.

Please ensure your affected employees and contractors, and their respective employees, are notified of the following Legionella information so appropriate precautions are taken.

Employees and contractors can be referred to available guidance below, which outline risks of exposure.

- CDC's "[Legionnaires' Disease Fact Sheet](#)"
- CDC's "[Legionella \(Legionnaires' Disease and Pontiac Fever\): Causes, How it Spreads, and People at Increased Risk](#)"
- OSHA's "[Legionellosis \(Legionnaires' Disease and Pontiac Fever\)](#)"
- EPA's "[Basic Information about Lead in Drinking Water](#)"
- CDC's "[Lead in Drinking Water](#)"
- MDHHS's "[Copper in Drinking Water](#)"

This letter serves as GSA's notification, per GSA Order PBS 2400.1, Risk Management Notification. GSA will continue to provide updates as the situation progresses.

If you have any questions, please feel free to contact GSA Lead Property Manager Patrick Russell at 313-269-2117 or patrick.russell@gsa.gov.