PSC | Federal Occupational Health
U.S. Department of Health and Human Services

Quarterly Asbestos Air Sampling Report

Completed For:
General Services Administration

Survey Location:
Chet Holifield Federal Building
24000 Avila Road
Laguna Niguel, California 92677

GSA Building Number: CA0521SS
Project Reference Numbers: A: 700387, S: 2019-2851, SO: 700388

Survey Dates: June 26, 2024, and June 27, 2024
Report Date: July 8, 2024

Prepared By:
Program Support Center, Federal Occupational Health
U.S. Department of Health and Human Services

Federal Occupational Health

EXECUTIVE SUMMARY

On June 26th and 27th, 2024, the Federal Occupational Health (FOH) inspection team conducted asbestos air sampling throughout the Chet Holifield Federal Building located at 24000 Avila Road in Laguna Niguel, California (GSA Building Number: CA0521SS). Air sampling was conducted to verify that airborne fiber levels were at appropriate levels.

Air samples were collected in common areas, storage rooms, file rooms and in occupied office spaces throughout the building. A total of sixty-seven (67) air samples, four lab blanks and three field blanks were collected and submitted for analysis using Transmission Electron Microscopy (TEM).

There are no current EPA regulations for general area air sampling and no regulatory action levels for direct comparison of airborne asbestos levels; however, the US Environmental Protection Agency (EPA) has regulations for area air sampling within containment after an asbestos abatement action has been completed. When performing general area asbestos air sampling, FOH compares the results to the EPA regulations.

Laboratory analysis indicated fiber levels for all samples to be less than 0.0050 structures per cubic centimeter (0.0049 s/cc). Results ranged from <0.0039 to <0.0050 structures per cubic centimeter (s/cc) of air.

For TEM AHERA samples, EPA uses the clearance level of 70 s/mm^2 after asbestos removal has been completed. This is the level at which EPA considers the space appropriate to return to general occupancy. Analytical results of all air samples indicate that asbestos concentrations were below the EPA clearance level of 70 s/mm^2.

The Memorandum of Agreement (MOA) between the General Services Administration (GSA) and the US Citizenship and Immigration Services (USCIS) dated February 15, 2017, states that results less than 0.005 s/cc are considered acceptable.

For any work that is conducted above the ceiling and in the plenum area, FOH recommends that such work be completed after hours while utilizing a negative pressure mini containment to minimize occupant impact and contain any settled dust that may be disturbed. Additionally, all work shall be conducted by appropriately trained / certified workers in accordance with all applicable local, State and Federal asbestos regulations.

All results from this quarterly air sampling event were less than 0.0050 s/cc of air.

A. INTRODUCTION

On June 26th and 27th, 2024, U.S. Public Health Service, Federal Occupational Health, inspection team members Michael Pinkerton, Joshua Everett, Jose Ayon, and Cameron McLain conducted asbestos air sampling at the Chet Holifield Federal Building located at 24000 Avila Road, in Laguna Niguel, California (GSA Building Number: CA0521SS). The air sampling event was overseen by California Certified Asbestos Consultant (CAC), Michael Pinkerton (CAC No.: 20-6871).

B. BACKGROUND

The Chet Holifield Federal Building is a United States Government Building managed by the General Service Administration and is occupied by government agencies. The 7-story pyramidal form building was constructed between 1967 and 1971 and is approximately 1,000,000 square feet in size. It is constructed of angled, painted, pre-cast concrete panels with reticulation, a textured finish that displays curvilinear forms and recessed anodized aluminum windows. The building has a concrete frame and the lateral force-resisting system consists of concrete shear walls and single-level concrete moment frames. This office space has carpeted and tiled floors, painted-sheetrock walls, drop ceilings, and the supply air is ducted while the return air is transported via the plenum area above the ceiling.

C. METHODS

Prior to the quarterly air quality assessment, an opening conference was held with GSA Senior Property Manager, Brandon Pierce, to discuss the procedures and locations of the air sampling. Air samples were collected from common areas, storage rooms, file rooms and in occupied office spaces.

Air sampling was conducted by drawing a known volume of air through a filter using flow-controlled pumps that were each pre and post calibrated. Calibration was made by using a Bios Defender 520 Primary Flow Calibrator, with a representative sampler in line. The filter media used was 0.45-micron pore-size mixed cellulose ester filter with backup pad. Each sample was collected open-faced in a 25-millimeter non-conducting cassette. Each sample was collected at breathing zone height. The samples were collected for approximately two hours until a sufficient volume of air was collected to meet the required limit of quantification for TEM analysis as well as meet the optimum fiber loading on the filter.

A total of sixty-seven (67) air samples, four lab blanks and three field blanks were collected and submitted for analysis using Transmission Electron Microscopy (TEM). During the sampling, two (2) samples were voided due to calibration errors and discarded. All samples were analyzed by LA Testing located in South Pasadena California. LA Testing is accredited under the NIST/NVLAP program for asbestos in bulk material by polarized light microscopy and the State of California for asbestos analysis. NIST/NVLAP lab code 200232-0, California ELAP Certificate No. 2280.

D. RESULTS

Laboratory analysis indicated fiber levels for all samples to be less than 0.0050 structures per cubic centimeter (0.0049 s/cc). Results ranged from <0.0039 to <0.0050 structures per cubic centimeter (s/cc) of air.

Complete laboratory results can be found in Section F-Supporting Documents of this report.

E. DISCUSSION AND RECOMMENDATIONS

There are currently no regulations for general area air sampling for asbestos and no regulatory action levels by which results may be directly compared. The US Occupational Safety and Health Administration (OSHA) has regulations for worker exposure which entails sample collection by placing the sampling device in the employee's breathing zone. However, this was not the case and therefore FOH will not compare the area sampling results to the OSHA PEL of 0.10 fibers per cubic centimeter. The US EPA has regulations for area air sampling within containment after an asbestos abatement action has been completed. When performing general area asbestos air sampling, FOH compares results to the EPA regulations. There are some differences in the method of collection since FOH did not collect the samples in containment, but the clearance level is the same.

For TEM samples, EPA uses the clearance level of 70 s/mm^2 after an asbestos removal has been completed. This is the level at which EPA considers the space appropriate to return to general occupancy. All samples collected by the FOH team have levels less than 70 s/mm^2.

The Memorandum of Agreement (MOA) between the General Services Administration (GSA) and the US Citizenship and Immigration Services (USCIS) dated February 15, 2017, states that results less than 0.005 s/cc are considered acceptable.

For any work that is conducted above the ceiling and in the plenum area, FOH recommends that such work be completed after hours while utilizing a negative pressure mini containment to minimize occupant impact and contain any settled dust that may be disturbed. Additionally, all work shall be conducted by appropriately trained / certified workers in accordance with all applicable local, State and Federal asbestos regulations.

The contents of this report have been reviewed by California DOSH Certified Asbestos Consultants (CAC), Benjamin Curry (CAC No.: 09-4549) and Michael Pinkerton (CAC No. 20-6871).

F. SUPPORTING DOCUMENTS

The following supporting documents are attached to the report:

- Laboratory Report/Chain of Custody (16 Pages)
- Sample Location Map