



[REDACTED]

June 25, 2019

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Dear [REDACTED]

Per your request, as directed in the Scope of Work issued on June 12, 2019, Federal Occupational Health (FOH) conducted a Bed Bug Assessment and Basic Indoor Air Quality (IAQ) Evaluation of the Social Security Administration (SSA) Office of Hearing Operations (OHO) located in the Eastgate Metroplex at 14002 E. 21st Street Suite 1140 Tulsa, OK 74134. This work was conducted under the Interagency Agreement established between the General Service Administration (GSA) Region 7 and FOH. The purpose of this assessment was to evaluate this leased building space relative to past and current issues related to bed bugs in the facility.

Survey Methods

The evaluations completed by FOH in the conduct of this investigation included the following:

- Review of provided background materials on the issue related to bed bugs in the SSA office and Eastgate Metroplex facility which summarized a period from July 2018 to May 2019;
- Meeting with GSA, SSA and representative of the Eastgate Metroplex to discuss past and current bedbug issues;
- Conducting a walk-through was inspection of the SSA office, the building space directly below the SSA location, the main building lower tunnel area and the common building areas located outside the SSA office entry point.
- Inspection of locations in which bed bugs had been identified on equipment or furniture in both the SSA space and the Eastgate Metroplex common areas;
- Examination of metal and plastic benches and chairs which had most recently been identified as containing one or multiply bed bugs and had been taken out of service, cleaned and treated;
- Review of the Eastgate Metroplex Pest Control Bed Bug Treatment Plan for SSA-OHO.
- Determining condition of carpets, ceiling tiles, wallboard, etc. for likelihood of contamination and/or mold growth;
- Inspection of carpets and other surfaces to determine the ongoing presence of pesticide dusts and residues;

- Inspection to identify potential water stained building materials and components and sources of plumbing leaks, water intrusion and/or moisture stained/damage building components and/or fixtures;
- Evaluation of the building heating, ventilating and air-conditioning (HVAC) system and components;
- Identification of potential tenant or building operations that may contribute to the presence of bedbugs and/or poor indoor air quality;
- Identifying any areas of suspected mold growth or chemical or dust contamination; and
- Collecting representative measurements of carbon dioxide (CO₂), carbon monoxide (CO), temperature and relative humidity in the facility and outdoors for comparison purposes. These measurements were performed using a TSI IAQ Calc Monitor, Model 7554. The instrument is calibrated by the manufacturer on an annual schedule.

Findings

The visual inspection of the common public access areas, throughout the facility and immediately outside the SSA office, was found to be clean and in good repair (see Photo 1). All carpet and other floor coverings appeared to be designed for use in high traffic public areas and were properly installed and clean (see Photo 2). All wall and ceiling areas were also found clean and dry. All furniture in these areas was made of plastic and/or metal and consisted of non-upholstered non-porous materials (see Photo 3). All building and components and furnishings were easily accessed and cleanable. The types of building products and furniture in this area would be consistent with efforts to control the potential harborage of bed bugs or other pests. The only issue found in this Metroplex common areas involved the hollow and, in some cases, open ended metal and plastic tubing composing the chairs and furniture structure that allows for pest to gain cover and be concealed in these areas (see Photo 4). No conditions or circumstances in the unoccupied Metroplex floor space under the SSA facility and building main basement tunnel, would be suspect as contributing to the harborage of bed bugs or other rodents or pests. No other significant sources of chemical or dust contamination was found. No residual pesticide residue or staining was found on furniture of building components.

The SSA OHO space was also found to be very clean, organized and well maintained (see Photo 5). All carpets and floor coverings were in excellent condition and free of excessive dirt or staining (see Photo 6). All painted sheetrock walls were also clean, in excellent condition with no moisture or other staining observed. The ceiling tiles throughout the space were clean and dry. However, two locations were found where ceiling tiles have been water stained (see Photo 7). All office fabric covered cubicle dividers, other furniture, desks, files, chairs were also very clean, dry and maintained. All equipment and supply storage rooms were very organized, clean and dry. The chairs and other furniture in the public access areas of this office, were made of metal and/or plastic and of a non-porous easily cleanable material (see Photo 8). All components of the heating, ventilating, and air-conditioning (HVAC) system(s) for this space were found to be clean, dry and well maintained. Pesticides have been used in this area to treat for bedbugs, however, no pesticide staining or residue was found on any building components or fixture and no sources of chemical or dust contamination were found in the space. The only chemical-based products used in the area are over the counter cleaning and maintenance products. No conditions or circumstances were

found in this SSA space that would provide an ideal setting for bed bug harborage. No obvious source(s) or indication of bedbug presence was found in SSA controlled space.

Temperature and relative humidity levels recorded in the SSA space were within American Society for Heating, Refrigerating and Air-conditioning Engineers (ASHRAE) recommended criteria as detailed in ASHRAE Standard 55-2-017. In most areas, rooms and offices of CO₂ were also in compliance with ASHRAE criteria as identified in ASHRAE 62.1 & 62.2. However, CO₂ airborne concentrations found in several Hearing Rooms was above this ASHRAE recommendation (i.e. greater than about 700 parts per million (ppm) above outdoor air). The results of these environmental measurements are contained in Table 1.

It should be noted, that the multiple offices, call-centers, restaurants and shops in the Metroplex are responsible for pest management and treatment in their individual leased areas. Metroplex management is responsible for pest control in the common areas and as established in the original lease with GSA, is also responsible for pest management in the SSA leased space.

Conclusions

It is concluded from this FOH visual inspection, that no inherent or obvious building conditions are contributing in significant bed bug infestation in the Westgate Metroplex facility or in the SSA space. However, the nature of the building use and open access concept, is creating a unique situation and challenge in efforts to control potential bed bug issues at the site. The interior mall portions of the building are public access areas, in that anyone can enter and remain in the building for an extended period. The air-conditioned open concept of the interior and facility restaurants, invite this type of visitation. Also located in the center of the open area near the main indoor fountain, is an Oklahoma Department of Public Safety Driver's License Issuing Office. This office brings in a variety of individuals who wait in the common area for extended periods until they are able to get into the State office. On any one day there are 100's if not 1000's of individuals who enter the building common areas with varying lengths of stay and activity. If any one of these individuals entering the building is carrying actual bed bugs, eggs or larvae on their person, clothes or belongings (purses, bags, satchels, etc.) the potential exists in the locations where this individual sits or places their belongings, for live bugs, eggs or larva to be deposited. This same theory would exist for individuals entering the common SSA office space. Therefore, although on any particular day individual identification of a bed bug or detection of bugs by trained sniffer dogs can be addressed, treated and corrected, another individual could enter the building the following day and the cycle could repeat itself. Due to these circumstances, the only effective way to address this potential bed bug and pest problem is through an ongoing comprehensive and detailed facility wide and SSA Office Integrated Pest Management (IPM) Plan. The current Eastgate Metroplex Pest Treatment Plan provided during the survey is not believed to be thorough and detailed enough to provide for ongoing effective management of this issue (see Photo 9 & 10).

Recommendations

Based on the evaluations completed by FOH on June 12, 2019 at the Tulsa Eastgate Metroplex and SSA OHO office in the facility, the following recommendations are provided:

1. A thorough IPM Plan should be put in place by the Eastgate Metroplex that covers all facility common and public access areas, private controlled leased space and in the SSA OHO Office. This plan should implement routine operations that will assure bugs issues are identified and controlled on an ongoing basis. This plan should be detailed relative to how potential and known pest issues are entering and being addressed throughout the structure. Ideally each individual business or occupant who is responsible for pest control in their leased space, should be included in an integrated facility wide IPM. Control of pests including bed bugs should be coordinated throughout the facility.
2. Access to the common areas of the Westgate Metroplex common areas should be limited to a set number of hours. Individual should not be allowed to remain in the facility after hours or overnight. Efforts should be made to control individuals who may bring bedding, sleeping bags or large containers or satchels of belongings into the facility.
3. Current holes and openings in the tubular metal benches and chairs should be sealed with caulking or filler material to not allow bugs concealment or access to these hidden and hard to inspect locations. Where possible pockets or crevices in chair and furniture components should also be sealed as best as possible.
4. All chairs and other furnishing should be inspected, cleaned and treated on a scheduled and routine basis to assure no ongoing pest harborage.
5. Framed wall hangings and photos above seating in the common areas and SSA space, should be inspected, cleaned and treated routinely to assure bed bugs are not attaching to and finding harborage on the backs of these objects.
6. Corners and coping areas around carpet and wall junctions should be routinely vacuumed, cleaned and treated.
7. It should be assured that SSA OHO workers, employees and contractors understand how to avoid the spread and distribution of bed bugs from person to person and office to home.
8. Efforts should be made to coordinate with the Tulsa Health Department to begin and/or expand outreach programs in the local community surrounding the Eastgate Center and throughout the city, to educate the public, address and control the spread of bed bugs in the community.

Thank you for your help and support with this effort. The assistance and support from all GSA and SSA staff contacted is most appreciated. Please let us know if you have any questions, comments, issues or concerns at this time.

Sincerely,

A large black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes.

[REDACTED]

Concurrence:

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Table 1
Carbon Dioxide, Carbon Monoxide, Temperature, Relative Humidity Measurements
Social Security Administration
Eastgate Metroplex – Suite 1140
14002 E. 21st Street Suite
Tulsa, OK 74134
June 12, 2018

Sample Number	Sample Location	Time	Carbon Dioxide (ppm)	Temp. (°F)	Relative Humidity (%)	Carbon Monoxide (ppm)
S1	North East Cubicle Area – SSA OHO	1335	741	75.8	40.4	1
S2	Visitors Lobby – SSA OHO	1334	941	77.1	41.1	0
S3	Hearing Room Hall – SSA-OHO	1339	861	77.0	39.7	0
S4	Reception Window – SSA OHO	1344	911	77.1	39.2	1
S5	South East Cubicle Area – SSA OHO	1347	846	76.9	38.7	1
S6	Training/Break Room – SSA OHO	1351	883	76.7	39.3	1
S7	Supply Room – SSA OHO	1355	848	76.3	39.5	1
S8	North Center Cubicle Area – SSA OHO	1359	791	75.9	39.2	0
S9	South East Judge Office Area – SSA OHO	1404	719	75.8	38.5	0
S10	North East Judge Office Area – SSA OHO	1408	740	75.6	38.8	0
S11	Judge Office Area Hallway – SSA OHO	1412	812	75.8	39.4	0
S12	Judge Office Area Near Exit Door – SSA OHO	1420	825	75.7	39.0	1
S13	Hearing Room 3 – SSA OHO	1425	1930	72.9	43.2	2
S14	Hearing Room 2 – SSA OHO	1429	956	75.1	39.2	1
S15	Hearing Room 1 – SSA OHO	1433	824	75.7	45.0	1
S16	Hearing Room 5 – SSA OHO	1438	844	75.7	45.0	1

ASHRAE Standards 62 and 55 recommend maintaining the following levels in occupied office space
Temperature: 68.0 °F to 74.0 °F (winter months) 73.0 °F to 79.0 °F (summer months)
Relative Humidity: <65%
Carbon Dioxide: <700 ppm above outdoor concentration

Carbon Monoxide Standards
OSHA TWA PEL – 50 ppm
ACGIH TWA TLV – 25 ppm
EPA NAAQS - 8-hour - 9 ppm; 1 hour – 35 ppm
NIOSH – TWA REL – 35 ppm; STEL REL – 200 ppm

Table 1 Continued
Carbon Dioxide, Carbon Monoxide, Temperature, Relative Humidity Measurements
Social Security Administration
Eastgate Metroplex – Suite 1140
14002 E. 21st Street Suite
Tulsa, OK 74134
June 12, 2018

Sample Number	Sample Location	Time	Carbon Dioxide (ppm)	Temp. (°F)	Relative Humidity (%)	Carbon Monoxide (ppm)
S17	Conference Room 2 - SSA OHO	1500	935	75.5	40.9	0
S18	Conference Room 1 – SSA OHO	1505	1007	76.7	41.0	0
S19	Eastgate Metroplex Open Area Near Fountain	1510	777	78.3	44.4	1
S20	Eastgate Metroplex Open Area	1515	754	78.7	44.2	1
S21	Eastgate Metroplex Building Managers Office	1520	812	79.4	41.1	1
S22	Eastgate Metroplex Open Area Outside SSA OHO	1530	941	76.5	39.12	1
S23	Hearing Room 4 SSA OHO	1545	1969	75.7	45.8	0
S24	Hearing Room 3 SSA OHO	1448	2082	75.0	42.2	0
S25	Lobby SSA OHO	1453	567	76.6	40.4	1
S26	Outside West of Building	1605	324	83.4	40.0	1
S27	Outside South of Building	1610	329	84.5	35.6	1
S28	Outside East of Building	1615	389	87.8	36.5	1
S29	Outside North of Building	1620	410	88.9	32.3	2

ASHRAE Standards 62 and 55 recommend maintaining the following levels in occupied office space

Temperature: 68.0 °F to 74.0 °F (winter months) 73.0 °F to 79.0 °F (summer months)

Relative Humidity: <65%

Carbon Dioxide: <700 ppm above outdoor concentration

Carbon Monoxide Standards

OSHA TWA PEL – 50 ppm

ACGIH TWA TLV – 25 ppm

EPA NAAQS - 8-hour - 9 ppm; 1 hour – 35 ppm

NIOSH – TWA REL – 35 ppm; STEL REL – 200 ppm

Photos



Photo 1 – Common Waiting Area - Eastgate Metroplex 14002 E. 21st Street Tulsa, OK 74134



Photo 2 – Common Hallway Area - Eastgate Metroplex 14002 E. 21st Street Tulsa, OK 74134



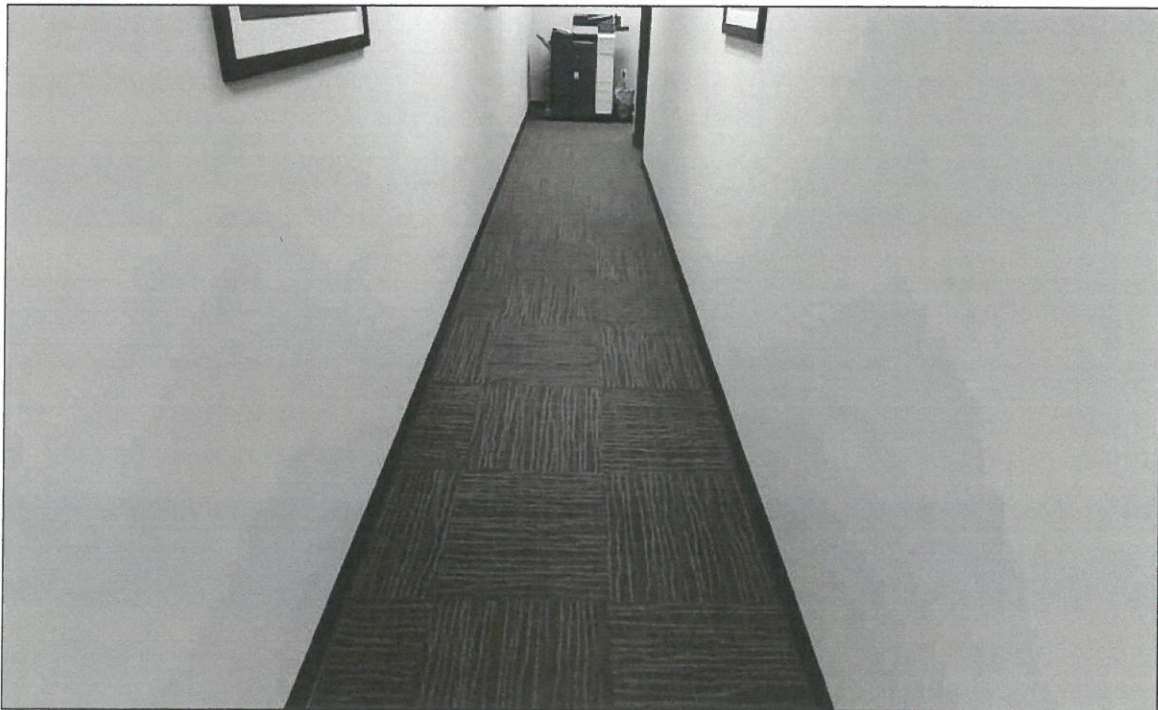
Photo 3 – Common Area Furniture - Eastgate Metroplex 14002 E. 21st Street Tulsa, OK 74134



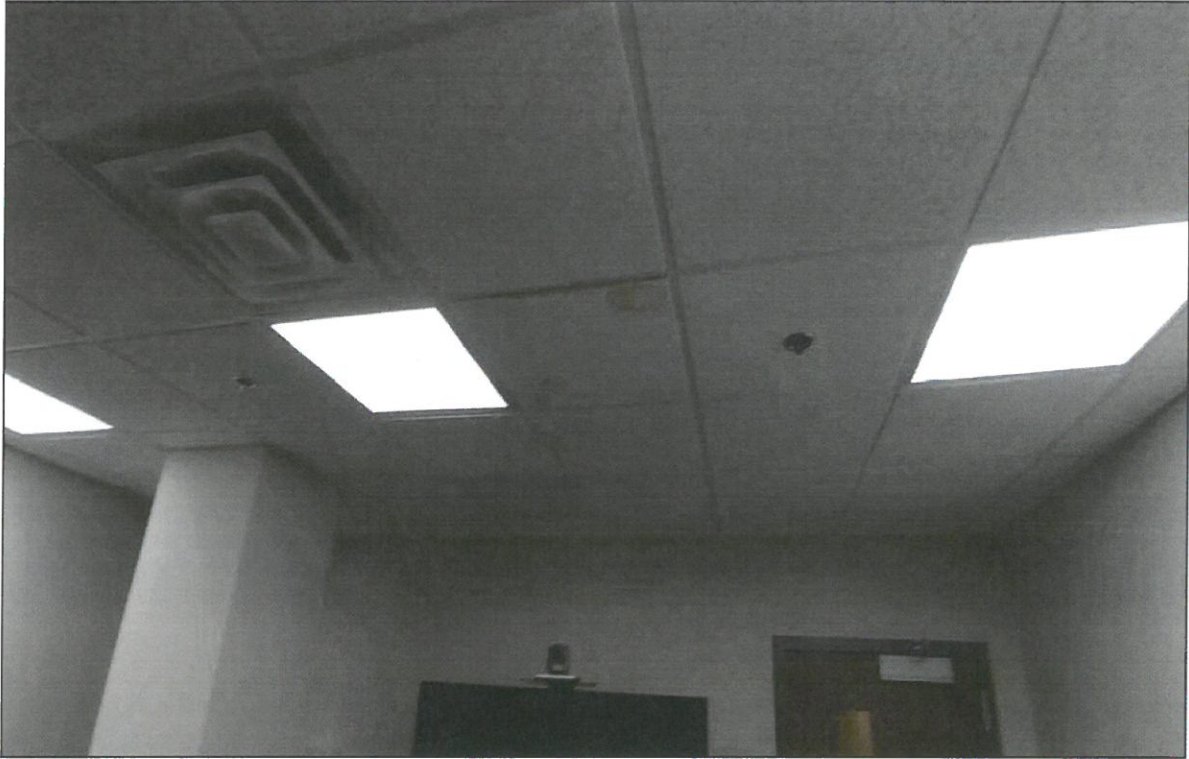
**Photo 4 – Office Furniture Metal Tubing Openings
Eastgate Metroplex 14002 E. 21st Street Tulsa, OK 74134**



Photo 5 – SSA OHO Area - Eastgate Metroplex 14002 E. 21st Street Tulsa, OK 74134



**Photo 6 – SSA OHO Area Carpet, Walls and Ceilings
Eastgate Metroplex 14002 E. 21st Street Tulsa, OK 74134**



**Photo 7 – Water Stained Ceiling Tiles SSA OHO
Eastgate Metroplex 14002 E. 21st Street Tulsa, OK 74134**



**Photo 8 – Waiting Room Seating/Furniture SSA OHO
Eastgate Metroplex 14002 E. 21st Street Tulsa, OK 74134**

**Pest Control Bed Bug Treatment Plan
for
SSA-OHO Suite 500 – Eastgate Metroplex**

An initial bed bug treatment will be applied to the entire suite. This will be followed by monthly inspections and additional treatments as needed in areas where bed bugs are found. Inspection schedule will be reviewed and adjusted as needed following bed bug abatement. Volcano traps will be put in place and monitored with the inspection schedule. Canine inspections are not included in the Landlord's pest control plan.

Manufacturer's instructions will be followed for all chemical use. The office will be well ventilated. Pest applications will be applied after hours and any residual material will be cleaned up. Chemicals used for treatment will be rotated by exterminator to reduce pest resistance. All chemical shall have SDS documentation submitted and approved by GSA prior to use.

Notification will be sent to OEHOS and GSA to have employees remove all food, cosmetics and anything they did not want exposed to the chemicals. SSA Hearing Office Director will notify the Union and employees and will be notified adequately in advance of application to ensure those notifications are done.

Exterminator will provide a visual inspection prior to employees return to the office. Confirm there are no odors, no visible signs of powder or residue on office equipment, office furniture, or employee's personal belongings and clean up any powders, dust or residue prior to opening the office.

Tenant will be responsible for notifying Landlord immediately if employees discover the presence of bed bugs at any time between treatments and inspections.

**Photo 9– Eastgate Metroplex SSA-OHO Pest Control Bed Bug Treatment Plan
Westgate Metroplex 14002 E. 21st Street Tulsa, OK 74134**

Addendum to Pest Control Bed Bug Treatment Plan for SSA OHO Office

1. SCHEDULE INITIAL TREATMENT
2. NOTIFY OEHOS AND GSA
 - a. OEHOS CONTACT
 - b. GSA CONTACT
 - i. OEHOS OR GSA WILL NOTIFY SSA HEARING OFFICE DIRECTOR
 - ii. SSA HEARING OFFICE DIRECTOR WILL NOTIFY UNION AND EMPLOYEES
3. ARRANGE FOR AFTER HOURS ACCESS TO SSA OHO OFFICE FOR EXTERMINATOR
4. INITIAL TREATMENT DONE AND VOLCANO TRAPS PUT IN PLACE FOR CONTINUOUS MONITORING
5. VISUAL INSPECTION DONE FOLLOWING INITIAL TREATMENT
6. FOLLOW-UP INSPECTION IN ONE MONTH
7. SPOT TREAT IF NEEDED
8. FOLLOW-UP INSPECTION ONE MONTH AFTER FIRST FOLLOW-UP INSPECTION/SPOT TREATMENT
9. IF NO BED BUGS FOUND – NEXT INSPECTION WILL BE DONE IN 3 MONTHS
10. IF BED BUGS FOUND – TREATMENT AS NEEDED WILL BE DONE
11. GO TO STEPS 6-10

**Photo 9– Addendum to Pest Control Bed Bug Treatment Plan
Eastgate Metroplex SSA-OHO
14002 E. 21st Street Tulsa, OK 74134**