



Gary Morton
President

Natasha Greaves
Executive Vice President

Dear Acting Administrator Nishida,

During the last administration, the Agency proposed, advanced, and/or completed several EPA facility closures, consolidations, and moves. Some of these moves are currently underway. Several of the laboratory consolidations and moves were identified by the Office of the Inspector General for lack of planning and management.¹ AFGE Council 238 (the Union) is inquiring as to the status of each of these closures, mergers, and moves in light of the change of administration and which of these efforts are being moved forward, frozen, or stopped. For any moves currently underway, the Union is interested in the COVID-protective procedures being used to address safety during the move and how those procedures are being updated to comply with President Biden's Executive Order on Protecting the Federal Workforce and Requiring Mask-Wearing.²

The closures, consolidations, and moves that the Union is interested in include but are not limited to the following facilities:

Region 5:

In September 2019, the Large Lakes Research Station (LLRS) Grosse Ile, Michigan, was closed and consolidated with the National Vehicle and Fuel Emissions Laboratory Ann Arbor, Michigan. The office space provided to the Region 5 Ann Arbor (R5AA) employees is a PortaFab Modular Building located in the West Soak warehouse. AFGE 704 and Congresswoman Debbie Dingell and Congresswoman Rashida Tlaib have repeatedly pointed out ventilation in this area is unsuitable for office space.

The American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 62.1 standard addresses indoor air transfer and recirculation. 100% of the portafab air is recirculating from the West Soak, which is defined by EPA reports as a "high bay warehouse space used primarily for storage." This transfer of air from the West Soak (ASHRAE Class 2 lower quality air) into the portafab (ASHRAE Class 1 higher-quality space) does not meet the 62.1 standard.

EPA and OSHA consider ASHRAE standards to be national consensus standards. Not meeting the standard is an indication of poor air quality. R5AA employees should not work in the portafab office until it meets ASHRAE standards.

¹ https://www.epa.gov/sites/production/files/2020-12/documents/_epaig_20201207-21-e-0033_glance.pdf

² <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-protecting-the-federal-workforce-and-requiring-mask-wearing/>



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Region 6:

Houston Regional Lab (being merged with the Ada ORD lab);

OAR:

Las Vegas National Center for Radiation Field Office (in process of move; letter sent from AFGE Local 1236 February 9, 2021)

Regions 9 and 10:

Richmond California Region 9 Lab being merged with and moving to the ORD Lab in Corvallis, Oregon.

AFGE Council 238 kindly requests a briefing on the status of these closures, mergers, and moves. Please advise on dates and times available with appropriate staff.

Sincerely,

Gary Morton
President, AFGE Council 238

3/1/21

