

High Risk Operations

Protecting Building Occupants and Agencies

Background and Benefits

Ensuring a safe environment for employees and visitors to GSA-controlled buildings is one of our highest priorities. In 2021, GSA updated the High Risk Operations policy and updated an associated GSA form ([GSA 12002](#)) that is completed as part of the Client Project Agreement for each high risk operation occupancy during the requirements development process. The updated policy will ensure our customers' operations do not pose a fire or safety risk within our facilities and OSHA requirements ([29 CFR 1960.34\(a\)\(7\)](#)).

PBS Planning Managers will work with customer agencies to complete GSA Form 12002 as necessary. PBS Project Managers will collaborate with customers and the appropriate environmental, health, safety, and fire personnel to develop technical requirements that address any fire or safety protection issues within existing high-risk operations.

About GSA's High Risk Operations Policy

GSA's High Risk Operations policy involves these main elements:

- Identifies customer agency High Risk Operations in the Client Project Agreement during the planning phase, to include location and adjacency considerations.
- High Risk Operations are defined as high risk laboratories, firing ranges, or shoot houses, and explosive materials storage.
- Requires minimum safety and fire technical requirements (from the customer agency or GSA) for the development and project management phase that will help avoid an incompatibility between the High Risk Operation and other facility occupancies.

The Role of PBS and Customers in GSA's High Risk Operations Policy

PBS will engage customer agencies during new or replacing space projects to identify and address any High Risk Operations. Existing customer agency High Risk Operations will be reviewed during cyclical safety and fire protection facility surveys, or as part of the expiring occupancy process.

The PBS Regional Planning Manager will capture any High Risk Operations in GSA Form 12002 while completing the Client Project Agreement. As a project moves forward, the PBS Regional Project Manager, GSA environmental, health, safety, and fire protection personnel, and the customer will collaborate to ensure the technical requirements properly address all safety and/or fire protection issues.



Examples of High Risk Operations

High Risk Operations are limited to three categories:

High Risk Laboratories	Firing Ranges/Shoot Houses	Explosive Material Storage
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A high risk laboratory will commonly include the following:

- Controlled access on entrance and exit doors
- Walls separating the lab from other spaces with a minimum one hour fire rating
- Full fire suppression (sprinklers) systems
- Dedicated HVAC system that doesn't mix with other areas of the building and has no recirculated air (i.e., 100% pass-through) and operates at a negative pressure relative to the rest of the facility
- Ducted laboratory exhaust fume hoods or bio-safety cabinets (no recirculated air)
- Installation of industrial laboratory benches
- A biological laboratory meeting all CDC BSL1,2,3 or 4 standards

A high risk laboratory may also include:

- The storage and regular use of relatively large quantities of reagents, solvents or chemicals
- The regular use of compressed gases either via tanks or plumbed to the lab
- Plumbed eyewash stations or emergency showers

Explosive materials storage relates to one or more of the following

Black Powder	Pellet Powder
Igniters, Initiating Devices, Igniting Cord	Detonators, Detonating Cord
Emulsion Explosives	Safety Fuses
Squibs	Dynamite & Other High Explosives
Water Gel	Blasting Agent

Conditions apply to explosive materials storage based on GSA guidance and applicable codes and regulations:

- Storage is prohibited in GSA Federal buildings that also house a childcare center
- In GSA Federal buildings, the explosive material storage room must be located on grade level (typically first floor) with direct access to the outside. Any exception to the explosive storage room's location requires the customer agency to provide a risk analysis report conducted by a licensed blast engineer and a licensed fire protection engineer.
- The customer agency should be prepared to provide a blast analysis report conducted by a licensed blast engineer for any indoor proposed location in a GSA Federal building
- Any proposed storage in a GSA leased facility will have to be approved by the local jurisdiction based on relevant codes and regulations.

For More Information

To learn more about GSA's High Risk Operations policy, please contact your national or regional customer lead.