



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 2022, 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 meet 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

Routine procedures, activities, and tasks that make up a Federal agency's operation, and by their very nature, are intrinsically high risk. High Risk Operations consist of:

High Risk Laboratories	Firing Ranges/Shoot Houses	Explosive Material Storage
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A High Risk Laboratory is any space solely dedicated to biological, microbiological, chemical, and/or physical testing, analysis and/or research activities, that also include, but is not necessarily limited to the use or handling of: oxidizers, toxic substances, peroxides, infectious agents, radioactive materials, and flammable substances. An example of a High Risk Laboratory is a biological laboratory with a Centers for Diseases Control and Prevention (CDC) Biosafety Level (BSL) 1 to 4. A High Risk Laboratory commonly includes:

- Security measures that prevent unauthorized access
- Separating the area from other spaces with a fire barrier having a fire-resistance rating of not less than one hour
- Protecting the area with an automatic extinguishing system (e.g., automatic sprinkler system)
- A 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
- Specialized mechanical systems (e.g., ducted laboratory exhaust fume hoods or bio-safety cabinets with no recirculated air)
- Specialized plumbing systems (e.g., compressed gas lines, chemical waste traps, sink aspirators, eyewash stations, or emergency showers)
- The storage and/or regular use of reagents, solvents, chemicals, and/or compressed gasses (e.g., cylinders or piping)

High Risk Laboratories do not include:

- Office space
- Storage space
- Warehouse space
- Or similarly constructed space used by an agency to perform limited laboratory support activities, such as sample collection, preparation, and/or storage, and test kit assays.

Such operations are not considered High Risk Laboratories even when they include partial space renovation or the use of some small amounts of chemical reagents or portable equipment for testing, sampling, or both.

Explosive materials storage includes, but not limited to, storage of the following:

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

Please note that the storage of small arms ammunition is not consider a High Risk Operation.

For More Information

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