Public Buildings Service
Desk Guide
For
Safety and Health Management
Companion to
GSA Order PBS 5940.3 Safety and Health Management

Office of Facilities Management
Facility Risk Management Division
October 23, 2019
# Desk Guide for Safety and Health Management

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Introduction

The intent of this Order and Desk Guide is to issue a national Public Buildings Service (PBS) facility safety, health, and environmental management policy whose requirements and subsequent execution will ensure agency compliance with applicable safety, health and environmental regulations at the regional and national levels; specifically 29 CFR 1910, 29 CFR 1926 and 29 CFR 1960. In order to achieve compliance, GSA uses the Occupational Safety and Health Administration (OSHA) recommended practices for safety and health programs (OSHA publication 3886 dtd 2016):

- Management leadership
- Worker protection
- Hazard identification and assessment
- Hazard prevention and control
- Education and training
- Program evaluation and improvement
- Communication and coordination for host employers

GSA applies the universally-accepted hierarchy of controls below to minimize the existence of potential hazards and address those that cannot be avoided in a safe manner:

1. Hazard elimination or substitution
2. Engineering controls
3. Administrative controls
4. Personal protective equipment

For example, the P100 Facility Standards for the Public Buildings Service is intended to eliminate, prevent or lessen hazards by incorporating requirements into facility construction and renovation projects.

What follows are the specific PBS requirements organized by individual OSHA general and construction industry standards. A number of existing Directives or Policies are incorporated herein by reference and provide the safety, health and environmental requirements for the specific subject matters that they cover:

- **PBS P100 Facility Standards for the Public Buildings Service**
  Establishes requirements for new construction and renovation projects to be in compliance with current codes and standards including applicable safety, health and environmental regulations

- **GSA ADM 5940.2 General Services Administration Occupational Safety and Health Program**
  Establishes the agency safety and health policy for OSHA regulatory compliance for all GSA employees

- **PBS 1000.8 Indoor Air Quality Management**
  Establishes requirements for providing and maintaining good air quality within GSA-controlled facilities
- **PBS 1000.7 Drinking Water Quality Management**
  Establishes requirements for ensuring potable drinking water in GSA controlled facilities
- **PBS 1000.1 Asbestos**
  Establishes requirements for managing asbestos in GSA controlled facilities in compliance with current OSHA and EPA regulations
- **PBS 5940.2 Radon**
  Establishes requirements for ensuring GSA controlled facilities are free from any health risks due to radon gas
- **PBS 1000.4 Fire Safety and Health (FSH) Space Evaluation Policy**
  Establishes an occupancy evaluation and permit system to ensure occupancies in GSA controlled facilities are compatible with the overall facility and other occupants
- **PBS Policy on Indoor Firing Ranges (issued 4/18/2012)**
  Establishes requirements for the design and maintenance of indoor firing ranges within GSA controlled facilities compliant with applicable safety health and environmental regulations.

These are minimum compliance requirements. Regional Environmental Health and Safety (EHS) Staff may elaborate or expand any section to meet unique regional, state or local requirements or operations.

The Fire Safety and Health (FSH) Space Evaluation Policy (P1000.4) addresses operations that pose a particularly higher risk to the building and other occupants: laboratories, indoor firing ranges, and ammunition and evidence vaults. The following also may pose greater or different risks than office occupancies based on their unique operations, occupants or configuration:
- Food service operations (cafeterias, snack shops).
- Childcare centers
- Warehouses
- Fitness centers
- Holding cells
- Health centers

**Definitions**

**Accident.** An accident is any unplanned event that results in personal injury or in property damage.

**Arc flash.** An electrical phenomenon where light and heat are given off from electrical explosion or discharge during an arc fault.

**Facility manager.** A GSA Field Office Director, Deputy Field Office Director, Building Manager or Building Management Specialist who has responsibility for the operation of a particular facility.
GSA controlled facility. Facilities under the jurisdiction, custody or control of GSA, including building operations and maintenance delegated to other Federal agencies by the Administrator of General Services.

GSA workplace. GSA workplaces are the offices where GSA employees reside as well as other facilities and areas where one or more GSA employees regularly visit, tour or work (e.g., common areas, mechanical rooms, roofs, etc.).

Hazard. A condition with the potential to cause injury, illness, or death of personnel; damage to or loss of equipment or property; or mission degradation.

Incident. An undesired event which does not cause death or injury to an individual; or damage to or loss of property or equipment; or mission degradation but, given slightly different circumstances, could have. This is sometimes referred to as a “near miss.” Incidents are often indicators that something more serious is about to happen.

Inspection and survey. An inspection is a process of comparing a situation or condition to an established standard. A survey is a process of examining a situation or condition. Safety and health evaluations of PBS facilities and operations involve both inspection and surveying. Therefore, the terms are used interchangeably within this guide.

Accident and Incident Reporting
All accidents in GSA controlled facilities or involving GSA employees shall be reported, investigated and any underlying hazards corrected in a timely manner. Refer to the GSA Directive (ADM 5940.2) for specific accident and incident reporting requirements.

Asbestos Management
The PBS policy intends to manage asbestos in place whenever feasible and institute controls that protect against human exposure and environmental contamination whenever asbestos is disturbed. Refer to the asbestos policy (PBS 1000.1) for specific asbestos management requirements.

Construction Safety and Health
Construction projects on PBS properties and workplaces pose potential safety and health risks to project contractors, nearby occupants, visitors and employees or the properties themselves. The PBS Division I project specifications contain sections to cover risks such as: construction safety and health, indoor air quality, asbestos or lead management. The act of demolition and construction on any project can create physical hazards such as: noise, dust, trips and falls. The nature of project can also create hazards unique to the project, such as: chemical exposures, hazardous dusts, electrical and energy hazards, and elevated surface work.
Safety and health hazards on projects managed by PBS or performed on GSA property shall be controlled through one or more of the following methods:

- **Air and noise barriers** installed to contain noise and airborne dusts and vapors during interior projects. Such barriers shall be placed at the perimeter of the construction zone and shall be sufficient to prevent exposure to building occupants and visitors from the associated hazards. Local exhaust ventilation or filtration may also be necessary to successfully contain any airborne contaminants.
- **Shift and/or staged work** to perform interior projects when areas are not occupied or occupants have been temporarily moved.
- **Construction monitoring** by trained and experienced safety and health representatives to ensure the project is executed in a safe manner.
- **Review of project contractor submittals** by trained and experienced safety and health staff to ensure compliance with the contract provisions and applicable regulations.
- **Review of project designs** by PBS safety and health staff or their representatives to ensure that project hazards have been identified. The following standard safety and health section shall be edited and included in all construction projects.

**Drinking Water Management**

Drinking water quality for GSA employees and in GSA controlled facilities shall be managed in accordance with PBS policy (PBS 1000.7). Refer to this policy for specific drinking water management requirements.

**Electrical safety**

GSA employees and those occupying or working in GSA controlled facilities can face risk of injury from electrical hazards that include: electric shock, fire, arc flash burns, arc blast, and other physical injuries (falling, hitting objects, etc).

GSA controlled facilities and GSA employee duties/tasks shall be free of electrical hazards. Electrical work on GSA construction projects shall meet P100 Facility Standards for PBS.

All electrical work (maintenance and construction) in GSA controlled facilities shall also comply with OSHA 29 CFR: 1910.269, 1910 Subpart S, 1926.97, 1926 Subparts K and V, as applicable.

All electrical equipment in GSA controlled facilities shall be operated in accordance with the manufacturer’s instructions and applicable OSHA regulations. Electrical equipment on GSA projects and in GSA controlled facilities shall always be de-energized and locked and tagged out during maintenance and repair, when at all feasible.

**Line drawing and incident analysis.** In an effort to comply with National Fire Protection Association (NFPA) 70E, facility Management staff, with support from regional Design and Construction shall have a single-line drawing, created for the electrical distribution system covering from the service entrance to branch circuit panels or circuits less than 240 VAC and 112.5 KVA whichever is farthest from the service entrance. Each drawing shall be updated at the completion of electrical upgrade projects. It is recommended that drawings should be updated every 5 years.

Where such does not exist, the regional Design and Construction office in coordination with the
Facility Management office, or qualified vendor shall perform an incident energy analysis in accordance with the Institute for Electrical and Electronics Engineers (IEEE) standard 1584. The analysis shall be performed in the following order: buildings where GSA employees work on energized equipment, buildings where contractors work on energized equipment, then buildings with the highest priority based on the safety risk assessment value (subparagraph iii below).

**Equipment maintenance.** All electrical equipment shall be maintained in accordance with National Fire Protection Association (NFPA) standard 70B, the aforementioned OSHA regulations, and National Electrical Testing Association guidelines (ANSI/NETA MTS-2011). A circuit breaker that trips after reset shall be evaluated by a qualified electrical worker before re-energizing. Tripped breakers shall only be reset after it has been determined safe to re-energize. Maintenance of equipment that present a potential arc flash risk and cannot be de-energized, such as testing of old fire pump controllers (>120V) shall be performed by qualified individuals, wearing appropriate personal protective equipment.

**Safety risk assessment.** Facility Management staff with support from the regional Design and Construction and EHS offices shall complete an electrical safety risk assessment for each facility using the following table (International Organization for Standardization ISO 3100):

<table>
<thead>
<tr>
<th>Factor</th>
<th>Level (L)</th>
<th>Weighting (W)</th>
<th>Subtotal (WxL)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Service Voltage or Serv. Transformer size</td>
<td>4 (high)</td>
<td>3 (significant)</td>
<td>2 (moderate)</td>
</tr>
<tr>
<td>System and equipment configuration</td>
<td>Exposed conductors - accessible areas (50v)</td>
<td>Exposed conductors - controlled areas</td>
<td>All equipment enclosed</td>
</tr>
<tr>
<td>System age</td>
<td>&gt;30 years</td>
<td>16-30 years</td>
<td>6-15 years</td>
</tr>
<tr>
<td>System condition</td>
<td>Poor</td>
<td>Several deficiencies</td>
<td>Some deficiencies</td>
</tr>
<tr>
<td>Maintenance History</td>
<td>No plan</td>
<td>NFPA 70B Partial compliance</td>
<td>NFPA 70B Substantial compliance</td>
</tr>
<tr>
<td>Project Activity</td>
<td>Many</td>
<td>Several</td>
<td>Some</td>
</tr>
<tr>
<td>Factor</td>
<td>Level (L)</td>
<td>Weighting (W)</td>
<td>Subtotal (WxL)</td>
</tr>
<tr>
<td>---------------------------------------------</td>
<td>--------------------------</td>
<td>---------------</td>
<td>----------------</td>
</tr>
<tr>
<td>Type of maintenance work performed</td>
<td>4 (high)</td>
<td>3 (significant)</td>
<td>2 (moderate)</td>
</tr>
<tr>
<td></td>
<td>Live work - accessible areas.</td>
<td>Live work - controlled areas</td>
<td>De-energized work - accessible areas</td>
</tr>
<tr>
<td>GSA employees exposed</td>
<td>Electricians</td>
<td>Other trades</td>
<td>Building management, inspectors</td>
</tr>
<tr>
<td>Contractor employees exposed</td>
<td>Electricians (O&amp;M and construction)</td>
<td>Other transient trades (unfamiliar)</td>
<td>Other on-site trades (familiar)</td>
</tr>
<tr>
<td>System criticality</td>
<td>Mission critical</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL Building Priority</strong> (sum of subtotals)</td>
<td></td>
<td></td>
<td></td>
</tr>
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Priority Ranking: High >105, Significant 71-105, Moderate 36-70, Low <36

**Labeling.** Facility Management staff with support from the regional Design and Construction and EHS offices shall label all electrical equipment in accordance with NFPA standard 70E 130.5, identifying circuit and equipment identification, and incident energy level. Labeling shall include:

1. Nominal system voltage
2. Arc flash boundary
3. One of the following:
   a. Available incident energy and corresponding working distance, or arc flash PPE category in the NFPA 70E table 130.7(C)(15)(A)(b), or 130.7(C)(15)(B) for the equipment, but not both
   b. Minimum arc rating of clothing
   c. Site-specific level of PPE

The arc flash assessment used, shall be reviewed at least every 5 years to address any changes in the electrical system.
Employees. Only GSA employees and contractors who are qualified electrical workers may work on electrical equipment or systems rated at or above 50 volts. GSA employees may not enter areas where unguarded, energized electrical equipment is being worked on. GSA employees may enter electrical spaces for purposes of inspection, touring, etc only after receiving training in the associated electrical safety practices (Electrical Safety / Arc Flash Awareness Training). All such restricted access areas shall be posted with warning signage.

Cords, outlets and appliances. Electrical extension cords used in GSA controlled facilities shall meet the following requirements:
- Can only be used for temporary power. Long-term or permanent use requires permanent wiring or receptacle.
- Must be UL or equivalently rated.
- Must be a grounded type (3-prong) and designed for hard or extra hard use (e.g. types S, ST, SO).
- Must be protected from damage, not be a tripping hazard, not strung through floors, walls or above/through ceilings, covered by protector or caution tape when extending into a path of travel.
- Adapter plugs (3 to 2 prong adapters) and daisy-chains shall not be used.
- Power strips must be plugged directly into outlets and the amount of electrical amperage should not exceed the limit of the power strip and its associated circuit.

Electrical outlets shall have only one device plugged into each outlet. Multi-plug outlet adapters shall not be used. Appliances must be UL or equivalently rated and must be directly plugged into an outlet or have a dedicated circuit. Personal appliances may only be used in GSA facilities with permission of the Facility Management office. Personal appliances, if allowed, shall be equipped with electrical and fire safety features such as tilt switches, timers, and/or thermal cut-offs. Consideration for use of personal appliances shall include: rating or listing, power required, safety features, resulting noise, and location of use (wet areas, nearby flammables or combustibles, etc). Facility managers and safety inspectors are responsible for identifying and assessing such conditions during routine facility tours and facility inspections.

Equipment Guarding
Equipment and machines used by GSA employees and those for which GSA is responsible in GSA controlled facilities shall be provided with one or more methods of guarding to protect the operator and others in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks.

Guarding shall:
1. Comply with OSHA 29 CFR Subparts O and P.
2. Be affixed to the machine where possible and secured elsewhere if for any reason attachment to the machine is not possible.
3. Not create a hazard and shall be designed and constructed as to prevent the operator from having any part of their body in the danger zone where injury risk is greatest.
4. Deny access to the point of operation and/or power transmission using fixed interlocked barrier guards such as fences and enclosures. Machine location can also be a form of guarding, such as creating a permanent distance barrier between individuals and the hazard.

Mechanical equipment in GSA controlled facilities that often require guarding include, but are not necessarily limited to, the following:
1. Air handler fans (e.g. blades, chains and/or belts) note: fan blades must be guarded if less than 7 feet from the floor
2. Exposed electrical equipment (e.g. elevator equipment)
3. Powered tools for maintenance (e.g. grinding wheels, table saws, joiners, hand tools)
4. Conveyors

OSHA defines four types of guards (OSHA Publication 3170-02R dtd 2007):
1. Fixed. A barrier that does not permit the operator to reach the danger zone
2. Adjustable. A barrier that adjusts for a variety of operations
3. Self-adjusting. A barrier that moves according to the size of the stock entering the point of operation
4. Interlocking. Shuts off or disengages power and prevents machine start up when guard is open.
5.

GSA employees and others using GSA responsible equipment or machines shall also lock-out/tag-out the devices before performing servicing and maintenance, if at all feasible. Equipment shut down outside of servicing and maintenance do not need to follow lock out tag out procedures and must be identified by a different type of tag.

**Ergonomics.**

Poorly designed or configured workspaces and equipment can lead to musculoskeletal disorders (MSD) for workers. The application of ergonomics can reduce or eliminate the risk of MSDs and thereby improve productivity, efficiency and overall worker wellbeing. There are no OSHA ergonomics regulations, but employers are required to review workplace injury reports and address hazards, including those caused by poor ergonomics. OSHA and others have guidelines for evaluating and addressing poor ergonomic workplace conditions. Within GSA workplaces and GSA facilities, complaints and injuries involving poor ergonomics are sometimes directed to the Office of Human Resources or the facility manager for resolution, respectively. Consultants may be brought in to evaluate and recommend good ergonomics. Regional EHS staff may also be requested to evaluate and make ergonomics recommendations.

**Supervisors.** GSA supervisors are responsible for responding to any employee MSD-related or ergonomic complaints by directing the complaint to the regional Office of Human Resources, or regional EHS staff. Supervisors are also responsible for ensuring employee work areas are free from known hazards and for ensuring workplace injuries and accidents are promptly reported.

**Building Management staff.** GSA facility managers are responsible for responding to occupant ergonomic complaints associated with overall building configuration and/or operations.
management staff should rely on technical support as needed, through contractors or regional EHS staff, to evaluate the ergonomic complaints and prepare recommendations to improve building-related ergonomic conditions.

Regional EHS offices. Regional EHS staff is responsible for providing technical support in evaluating ergonomic complaints and making recommendations for improving ergonomics when requested.

**General Facility Safety and Health**

**Medical Sharps.**
Refer to PBS guidance, issued 2/15/2018, for specific requirements

**Infectious Diseases.**
Infectious diseases (also called communicable diseases) are illnesses caused by pathogenic organisms such as bacteria, viruses, parasites or fungi. An epidemic or disease outbreak can occur in any community or region, putting all local occupants at risk of illness from that particular pathogen, including those occupying or visiting GSA controlled facilities in the area. Such outbreaks can be caused by known pathogens (e.g., ebola virus, influenza strains, west nile virus, etc) or newly discovered pathogens (e.g., zika virus). Occupants and visitors in GSA controlled facilities can also be at risk of illness when exposed to pathogens or contagious individuals, absent any epidemic or outbreak. Such pathogens include but are not limited to: tuberculosis, human immunodeficiency virus (HIV), hepatitis, meningitis, and pneumonia.

Proper cleaning, hygiene and associated control measures are essential to avoid contracting an illness while in GSA facilities. This is particularly critical for buildings in high risk zones during an outbreak or epidemic. Existing contract language requires custodial contractors working in GSA facilities to train their employees in the OSHA bloodborne pathogens standard, and have a written bloodborne pathogens program. Current updates to the standard custodial contract specification will require each contractor and their employees to have a facility-specific exposure control plan (ECP). The ECP must address any task that can involve contact with infectious pathogens, such as: responding to spills or incidents involving body fluids, removal of bird droppings, or regular cleaning in laboratories or restrooms. Contractors lacking the qualifications to perform such tasks shall be required to sub-contract such services to qualified companies or persons. Regular cleaning services under the standard contract are not intended to include pathogen decontamination in holding cells, laboratories, health units and similar higher risk occupancies. Such services are considered above-standard and shall only be performed by trained, qualified individuals.

During outbreaks or epidemics, additional control measures may be needed to prevent the introduction of infectious disease into affected GSA controlled facilities. In the event of an outbreak or epidemic, GSA will always defer to the Centers for Disease Control and Prevention (CDC) and/or State Health Departments for guidance and direction, including actions that could affect facility operations and general occupancy. Occupant agencies and contractors are responsible for ensuring any employee or individual under their control, who has been exposed
to an infectious disease, is contagious, or expresses symptoms during an outbreak, does not pose an infection risk to anyone else in a GSA controlled facility.

**Health and Safety Facility Inspections.**

Facility inspections are required to ensure buildings and workplaces are free of safety and health hazards. Safety and health facility inspections are one or more of the following types:

1. Regular. Annual OSH and five-year safety and health inspections
2. Targeted. As required or requested inspections
3. Program inventory. Management Analysis and Review System (MARS) and Facility Management Assessment (FMA).

Inspections whose scopes and frequencies overlap may be performed concurrently. Information from one inspection can also be used to inform on other similar inspection(s). For example, information from an annual or five year inspection may be used to complete a simultaneously scheduled safety and health FMA inspection. Annual or five year inspections performed no more than one year prior can also be used to complete an upcoming FMA. Regional PBS leasing offices are responsible for ensuring any safety, health or environmental requirements are met for new leases. Regional Lease Administration Managers (LAMs) are responsible for evaluating any safety and health components that make up their annual lease inspections. Regional PBS safety and health staff shall assist leasing offices and LAMs when technical support is needed: to review lease contract submittals, annual inspection observations, or in response to unresolved occupant complaints.

The inspections (annual, five year, LAM), facility manager duties (tours, tenant communication), and COR duties (custodial, operations and maintenance, and construction contracts) are all intended to ensure GSA provides safe and healthy workplaces for all tenants, employees and other occupants, in the following manner:

- Annual and five year inspections identify potential hazards that can be prevented or mitigated, throughout GSA controlled facilities.
- GSA facility managers and Operations and Maintenance contractors perform daily or frequent tours of all spaces and equipment in GSA owned and operated facilities. Such tours identify potential concerns and risks to be corrected or prevented for the facilities and all occupants.
- LAMs regularly inspect tenant and common spaces in leased facilities for similar risks or concerns in order to ensure safe and healthy workplaces for occupants.

**Regular annual safety and health facility inspections**

Regional PBS Facility Management offices shall conduct annual inspections of all GSA controlled facilities and leases that are also GSA workplaces. The inspections, also commonly referred to as OSH surveys, are:

1. Intended to meet the requirements of OSHA 29 CFR 1960.25(c)
2. To be performed by safety and health professionals with current training on recognizing and evaluating occupational workplace hazards.
3. Intended to evaluate the GSA operations and building conditions in terms of compliance with applicable regulations, safe and healthful work practices, and PBS policy.
4. To cover:
   a. for Federal facilities, all GSA offices, common areas, mechanical areas, roof areas, GSA construction areas, and building exterior
   b. for lease facilities, all GSA offices and common areas

In addition to regularly scheduled inspections, a sufficient number of facilities shall be selected for unannounced inspections to be able to ensure accurate identification and abatement of hazardous conditions.

**Regular five year safety and health facility inspections**
Regional PBS Facility Management offices shall conduct inspections of all GSA controlled facilities at least every five years. The inspections are:

1. To be performed by safety and health professionals with current training on recognizing and evaluating occupational workplace hazards.
2. Intended to evaluate the building conditions in terms of compliance with applicable regulations, safe and healthful work practices and PBS policy.
3. To cover all common areas, mechanical areas, roof areas, GSA construction areas and building exterior.

A final written report shall be prepared for each inspection. Reports shall contain at minimum: an executive summary, a description of the inspection, a list of the conditions or deficiencies noted, recommendations for each condition or deficiency. Reports should include sufficient detail to easily identify the facts of the inspection including: references, photos, and diagrams.

Conditions or deficiencies for each inspection shall also be logged into a PBS enterprise application, spreadsheet, database or similar current national PBS format. Each open condition or deficiency shall be shared with the persons responsible for abating the conditions and tracked by regional PBS safety and health professionals through final abatement or closeout. Open conditions or deficiencies that represent noncompliance with OSHA standards shall be abated within 30 calendar days, if possible. Otherwise, an abatement plan shall be developed to abate the condition and interim controls put in place to isolate the hazard until final abatement.

**Targeted safety and health facility inspections**
Regional PBS Facility Management offices shall conduct inspections as required or requested based on the following circumstances:
- A fatality incident or certain injury/illness conditions require an accident investigation.
- Workplace of more than 10 employees, with greater than 3 lost-time worker compensation claims in the fiscal year, and total claims rate that exceeds the regional rate for the year. An unsafe/unhealthy workplace report require an inspection
Informal occupant or employee complaints about safety or health conditions may require an inspection

A final written report shall be prepared for each targeted inspection. Reports for accident investigations and unsafe/unhealthy workplace reports shall include the information, and follow the formats specified in GSA 5940.2 ADM directive or OSHA requirements. Reports for informal complaint inspections shall include at minimum: an executive summary, details, conclusions, recommendations. Informal complaint reports shall include sufficient information to understand all details of the complaint and the resulting inspection.

Program Inventory Inspections
Inspections for purposes of updating facility information such as asbestos, lead-paint, permit-required confined spaces, high noise areas, and antennas shall be documented in an existing PBS enterprise system such as NCMMS or IRIS, or in a spreadsheet or database readily accessible to those responsible for facility management, construction and operations. The inventory records shall be maintained in accordance with Federal regulations or as long as the facility is owned by GSA, whichever is longer. See specific policies for applicable requirements.

MARS and FMA inspections
Regional PBS Facility Management offices shall conduct Management Analysis and Review System (MARS) and FMA safety and health inspections in accordance with their respective five year schedules. If annual or five year safety and health facility inspections have been performed within the MARS or FMA five year cycle period, information from said inspections can be used to complete the safety and health MARS checklist and/or FMA template.

The FMA template for safety and health surveys has a series of questions covering all major health, safety and industrial hygiene program topics. The questions are designed to cover the basic attributes and condition of each building surveyed. The questions for non-structural seismic conditions are intended only for facilities in high risk earthquake zones and should be answered based on conditions readily observed during the inspection.

The MARS checklist and FMA template for safety and health shall be completed as documentation for each respective effort. The completed MARS checklist and any supporting documentation shall be shared with the MARS team. The completed FMA checklist and any supporting inspection report shall be uploaded into the PBS IRIS FMA enterprise system. Scheduling for FMA inspections shall also be logged into the same PBS enterprise system. FMA health and safety observations that represent a risk to a facility shall be tracked to abatement or risk reduction through the PBS enterprise system.

Hazard Communication and Notification
Contractors and tenant agencies that are exposed to, use or store hazardous chemicals in GSA controlled facilities shall have and follow their own written hazard communication program that complies with OSHA 29 CFR 1910.1200; specifically with regard to labeling, maintaining an accurate inventory, safety data sheets (SDS) and communication of hazards. GSA employees who use or store chemicals in GSA workplaces are also required to have an OSHA compliant written program.
Service contracts. GSA operations and maintenance and custodial contracts require contractors to furnish GSA their written hazard communication plan, a list of chemicals and their SDS’s for review before use in GSA facilities. The maintenance and cleaning chemicals may be used only after regional EHS staff or their representatives have reviewed the information and approved them. The contracts also encourage the use of water-based and low or no-VOCs products for cleaning and maintenance which are generally a less hazardous alternative. GSA contracting officers representatives are responsible for verifying contractor compliance with the contract terms and associated hazard communication requirements.

Construction projects. The PBS P100 Facility Standards for new construction requires contractors to provide a list of chemicals and their SDS’s proposed for the project, to the GSA COR for review. Only after the COR has approved the chemicals, with technical assistance as needed from regional EHS staff, may the chemical products be used on the project.

Hazardous Energy Control
OSHA 29 CFR 1910.147 applies to equipment and machines owned or used on GSA property in which the unexpected energization or start up could injure employees, other workers, or damage property in a release of energy during servicing or maintenance.

Employees. GSA employees who perform service or maintenance on equipment or machines shall ensure the energy is isolated from the machine or equipment and rendered inoperable throughout the servicing or maintenance. This shall be assured by the development of equipment specific procedural steps that specifically outline the methods and steps necessary to control hazardous energy and re-energize the equipment upon completion. The steps will include the measures needed for locking out the machine or equipment (lock-out) and affixing a tag (tag-out) to prevent accidental re-energizing. Where clear lock-out/tag-out of machines or equipment is not feasible, the regional environmental safety and health office shall assist the office responsible for the GSA employee in creating a specific written lock-out/tag-out program. The written program shall clearly describe how each affected machine or piece of equipment shall be safely isolated from potential or stored energy and rendered inoperable throughout maintenance or servicing. EHS Staff that service and maintain equipment that requires lock out shall annually review procedures to ensure compliance with the OSHA standard. Periodic inspection of the lock-out/tag-out devices will also be conducted.

Training. Each employee who performs service and maintenance and therefore locks or tags out equipment (authorized employee) must be trained in accordance with OSHA requirements for controlling hazardous energy (29 CFR 1910.147) in:

1. the recognition of applicable hazardous energy sources,
2. the type and magnitude of the energy available in the workplace,
3. the methods and means necessary for energy isolation and control,
4. in the purpose and use of the energy control procedure (both affected and authorized employees),
5. limitations of tags
Training shall be repeated whenever there is a change in equipment, job duties, procedures or when it is evident current procedures are inadequate.

Hearing Protection and Occupational Noise
GSA Employees. Regional EHS offices shall establish and administer a hearing conservation program for any GSA employees who are exposed to noise levels at or above the OSHA action levels established in 29 CFR 1910.95 (85 dBA for 8 hours, a 50% dose, or 140 dBA instantaneously). Employees shall be protected from exposures exceeding these levels through noise reduction engineering or administrative controls, or issuance of hearing protectors that reduce the noise exposure below the OSHA levels.

Hearing Conservation Program. When GSA employee exposure exceeds the aforementioned OSHA levels, the resulting hearing conservation program shall consist of, at minimum:
1. noise measurements
2. employee exposure monitoring,
3. employee notification of monitoring results
4. audiometric testing program
5. control of noise through engineering, administrative methods or issuance of hearing protection

GSA facilities and equipment. During annual OSH inspections, sound level measurements will be taken in any area the inspector determines noise levels may be exceeding OSHA action levels and a determination is made as to the length of time any individual would be working in that area. GSA facility managers with technical assistance from regional EHS staff, shall also test near equipment or in areas whenever a complaint is received about excessive noise. When locations exceed the levels and duration, the GSA Facility Management office with support from the regional EHS staff shall enact engineering controls or equipment replacement to reduce the noise levels. Whenever the noise cannot be attenuated below the current OSHA level of 90 dBA, the Facility Management office shall post caution high noise area signage at the entrances along with disposable ear plugs, sufficiently rated, for all to use when entering the spaces. In new construction, the PBS P100 Facility Standards impose a standard of acoustic comfort. This is achieved by incorporating ambient noise in open areas (for privacy, conversation, etc) while avoiding excessive noise from mechanical equipment.

Indoor Air Quality
Refer to the PBS policy (PBS 1000.8) for specific indoor air quality management requirements.

Smoking.
Refer to the Federal Management Regulations bulletin (FMR 2009-B1) for specific smoking requirements.

Electronic cigarettes.
The Federal Drug Administration ruled that all tobacco products, including e-cigarettes, to be subject to the Federal Food, Drug and Cosmetic Act (81 FR 28973 dtd 5/10/2016).
Consequently, GSA considers electronic cigarettes to be subject to the same restrictions as tobacco smoking in GSA controlled facilities.

Lead

Lead in GSA controlled facilities may be present in the form of paint, dust, fumes or soil/groundwater contamination. Lead in soil and groundwater, drinking water and as a hazardous waste is regulated by the EPA. Lead in paint and dust, for homes is regulated by HUD. Lead as an airborne contaminant in the workplace, in the form of dust or fumes, is regulated by OSHA.

1. **Lead-paint.** GSA recognizes the HUD definition of lead-based paint (1 mg/cm², or 0.5% by weight). Projects involving sanding, grinding, cutting or otherwise disturbing painted surfaces in GSA controlled buildings shall undergo a pre-alteration assessment by the project team, consultant, or EHS office during planning and design to identify potential impact on lead-based paint. Surfaces found to contain lead-based paint shall be managed in a manner compliant with OSHA and HUD regulations. Lead abatement shall be considered complete and acceptable when subsequent air samples are below the OSHA action level (30 ug/m³ 29 CFR 1926.62(b)) and dust samples are non-detect for lead on solid surfaces and no more than the HUD (10 ug/ft² as lowest) clearance values for other surfaces. EHS offices shall conduct building-wide lead paint surveys whenever resources are available. Survey results shall be used in assisting with the pre-alteration assessments.

2. **Lead dust.** Dust containing lead may be present in GSA facilities from construction debris, indoor firing ranges, legacy operations, lead-paint deterioration, or ambient air and soil.
   a. **Indoor firing ranges.** Refer to the PBS policy (issued 4/18/2012) for specific indoor firing range design and maintenance requirements.
   b. **Unknown sources.** Dust in GSA facilities shall be managed as contaminated material whenever lead levels are found to be above the OSHA action level (30 ug/m³) in the air or current applicable HUD limits for surfaces. The Facility Management office with support from the regional EHS office shall take the following action when dust is found to be contaminated with lead:
      - Use immediate controls to isolate the dust from employees, occupants, contractors or visitors who could be exposed. Examples of immediate controls include: closing doors and windows, posting signage.
      - Stop any existing work that is likely to disturb the dust
      - Notify occupants, contractors and employees affected by the dust
      - Abate the dust if feasible, or institute engineering or administrative controls to prevent exposure to occupants, employees and contractors. Controls may include: following a site specific safety work plan, enclose the dust areas, install barriers. Dust waste should be considered hazardous for handling and disposal, unless laboratory testing indicates otherwise.
- Take surface and air samples following abatement or disturbance to measure potential exposure.

3. **Occupational lead exposure.** GSA employees potentially exposed to airborne lead, shall have their job duties reviewed by the regional EHS office or their representative to document any lead exposure. Such duties may include: paint scraping or sanding, welding, cleaning, or activities that may disturb lead-contaminated dust. Any airborne exposure above the OSHA limits (30 ug/m³ action limit, 50 ug/m³ PEL), shall require the associated OSHA lead standard regulatory requirements to be met including, medical monitoring, training, administrative and exposure controls, work practices and personal protective equipment. The regional EHS office shall assist the employee(s) and their supervisor in ensuring compliance with the OSHA standard.

4. **Environmental lead.** Lead found to be present in soil or groundwater on GSA property and above the actionable limits as determined by EPA, state or local regulations shall be managed as required by the applicable regulation. Regional EHS staff and facility managers shall work with the regulator(s) having jurisdiction to ensure that any required monitoring, cleanup, or management action is compliant with the regulations. Precautions shall also be taken by the Facility Management office, with EHS office support, to ensure building occupants, contractors, visitors and employees are not exposed to lead from the contamination.

5. **Lead in drinking water.** Refer to the PBS policy (PBS 1000.7) for specific drinking water quality management requirements for lead.

**Occupancy Permit / High Risk Space Use.**
Refer to the PBS Fire Safety Health Space Evaluation policy (PBS 1000.4) for specific occupancy permit requirements

**OSH Committees.**
Refer to the GSA Occupational Safety and Health Program policy (ADM 5940.2) for specific OSH committee requirements.

**PBS Regional Safety and Health Program.**
In order to manage and execute the safety and health program requirements in a consistent manner throughout PBS, each region has to have the following minimum elements:
- In-house staff or access to GSA staff who are educated and experienced in safety and health standards and regulations.
- Contracted support for technical safety and health or industrial hygiene consulting for overflow and/or unique work requirements.
- Regional written programs or processes for each of the major safety and health areas consistent with national policies and guidance.
  - Accident/Incident reporting
  - Asbestos management
  - Construction safety and health
  - Drinking water management
Each program area shall include the following sections, at minimum:

1. **Background or Purpose**
   An overview of the safety and health topic or area. Regulations, standards and/or policies that govern the area, and the stated objective of compliance with same.

2. **Scope or Applicability**
   Explanation of how and to what extent the topic or area applies to GSA, PBS and specifically to regional offices.

3. **Roles and Responsibilities**
   The specific responsibilities of each regional PBS or GSA office, their role in successful execution of the safety and health program area. Successful execution is defined as compliance with applicable regulations, agency policies, and maintaining overall safe and healthy workplaces and facilities for the region.

4. **Definitions**
   A list of definitions for unique or technical terms used in the document

5. **Procedures or Guidance**
   The specific processes, methods, forms and associated steps to be followed regionally for the safety and health topic or area. The procedures or guidance may reflect unique regional organizational structure and/or existing procedures but must not differ substantially from the GSA or PBS national written program. Regional information associated with the management and execution of safety and health program areas is captured and maintained within any applicable and existing national data system (e.g. IRIS, NCMMS, CFR, etc) or is otherwise maintained by the regional EHS office in a complete and thorough manner sufficient to track all safety and health deficiencies to resolution and report to national office all activities as requested.
Permit-required confined spaces.
A confined space is an area large enough for an employee to enter and perform work, has limited or restricted means for entry or exit, and is not designed for continuous occupancy (29 CFR 1910.146(b)). Confined spaces in GSA facilities shall be identified by facility OandM staff, regional EHS staff, or safety and health consultants. Identified spaces shall be confirmed by regional EHS staff or their representative during periodic facility inspections. A confined space requires permission to access (“permit-required”) when it contains or has a potential to contain a hazardous atmosphere, contains a material with the potential for engulfing an employee, has a configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section or contains any other recognized serious safety or health hazard. Once identified, permit-required confined spaces shall be modified as feasible to eliminate the hazardous conditions. Those spaces that cannot eliminate the hazard shall be disclosed to the Facility Management office, service contractors and others involved with a need to access to the spaces. The Facility Management office with support from the regional EHS office shall ensure permit-required spaces meet the OSHA compliance with regard to signage and notification. Contractors shall be notified by the Facility Management office of the OSHA requirements for permit-required spaces before they enter.

Personal Protective Equipment.
In compliance with OSHA standards (29 CFR 1910.132) Personal protective equipment for GSA employees, including respiratory protection shall only be issued after a hazard assessment has been performed by the regional EHS office or their representative, the hazard has been documented, and all other control methods are inadequate or infeasible. Very few GSA employees currently perform trade work (plumber, carpenter, mechanic, etc), but those who engage in such work are at greater risk of regular exposure to chemical and physical hazards, than all other employees. Required PPE for non-trade employees is typically limited to hearing protection, safety glasses, hard hats, and/or safety shoes depending on the duties and work area.

Employee exposure assessment. When a potential hazard is reported or identified involving GSA employees, the regional EHS office shall conduct a hazard or exposure assessment. The purpose of the assessment is to confirm the presence of the hazard and identify the degree of exposure.

Job Safety or Hazard Analysis (JSA/JHA). A JSA or JHA is the process of evaluating the hazard or exposure for GSA employees engaged in certain tasks or duties which involve the potential hazard. The evaluation for physical hazards can be as simple as observing the actions of the employee relative to the work area and associated equipment. Evaluation for chemical, thermal or biological hazards usually requires testing or measurements to ascertain whether any exposure exceeds applicable OSHA limits. For multiple employees performing an assortment of duties associated with a given hazard, the regional EHS office shall use a worse case exposure scenario as the JHA/JSA.. JHA/JSA’s are typically within the expertise of industrial hygienists.

Exposure monitoring. Exposure monitoring for respiratory protection, is the physical measurement of airborne fumes, gases, vapors or particles that can be inhaled by working individuals. Such monitoring typically consists of placing an air sampling device in the breathing zone of worker(s) while engaged in job duties involving airborne chemicals, dusts and/or particles. Monitoring is needed to determine the need for respiratory protection. Issuance of respiratory protection as a prophylactic measure is not acceptable. For GSA employees it is
preferable to enact engineering or administrative controls to eliminate a potential exposure. Respiratory protection requires a medical assessment, fit testing, training and maintenance. The failure of any of these elements can potentially cause harm to the employee. Respiratory protection shall only be issued after exposure monitoring has confirmed that even if an employee performed the monitored task in the safest manner possible, the risk of exposure would still result in levels over the OSHA limits. This typically involves tasks associated with lead or asbestos in GSA facilities.

Medical surveillance. Refer to the PBS guidance (issued 2/1/2016) for specific medical surveillance requirements.

Hazard control methods. Once a physical or exposure hazard has been confirmed, the employee’s supervisor with assistance from the regional EHS staff shall work with other associated regional offices (facility manager, project manager, director or manager, etc) to remove the hazard or isolate the employee from the hazard. The following hierarchy of controls shall be considered. They are listed in order of preference. PPE is usually chosen when the other controls are not effective or available. However, PPE for physical hazards can be issued to GSA employees in addition to the other controls. When issued, the PPE must be appropriate to the hazard (e.g. ear plugs must have a protection factor great enough to lower noise to below the PEL), training given on the use and maintenance given to the employee, and periodic checks of the PPE performed by EHS staff or their representative. Most PPE use in GSA facilities protects against potential physical injury. Whereas, respiratory protection may be protecting against an IDLH environment (immediately dangerous to life and health) or contaminants that can lead to chronic disease. Therefore greater caution through additional evaluation of the hazard should be exercised before considering respiratory protection issuance for employees.

1. Elimination
2. Engineering controls
3. Administrative controls
4. Protective Equipment

Powered Industrial Vehicles.

Vehicles owned by GSA or operated by GSA employees shall be maintained in compliance with 29 CFR 1910.178 (Powered Industrial Trucks), 29 CFR 1926.601 (Motor vehicles on construction roads), as applicable. Each supervisor shall ensure that their employee who operates a powered industrial truck operator is competent to operate the truck safely, as demonstrated by the successful completion of the training and evaluation specified in this paragraph (29 CFR 1910.178(I)(1)(i).

Vehicles shall be inspected by their GSA operator before and after each use. Vehicles found to be unsafe, shall be taken out of service by the owner office and not used until repaired. Vehicles shall be operated in GSA facilities and on GSA property in a safe manner such that they pose no risk to pedestrians, other vehicles or the facility structure. Vehicles observed to be operating unsafely shall be reported to the Facility Management office.
Radiation Safety.
Radiation is either ionizing (e.g. radioactive materials) or non-ionizing (e.g. radio-frequency). Ionizing radiation is typically found in GSA controlled facilities as sources for laboratory or testing equipment (e.g. XRF lead-paint analyzers, x-ray machines, etc) or as naturally-occurring radon gas. Non-ionizing radiation is often found on facility antenna locations.

Ionizing radiation. Radon is managed in accordance the PBS policy below. Owners of radioactive sources and devices in GSA facilities shall adhere to the Nuclear Regulatory Commission requirements for licensing and management.


Radon.
Refer to the PBS policy (5940.2) for specific radon requirements.

Safety and health Training.
Refer to the GSA Occupational Safety and Health Program policy (ADM 5940.2) for specific training requirements.

Tenant agency / contractor safety.
As employers, tenant agencies and contractors are required to have their own safety and health programs to protect their employees from workplace hazards.

Tenant agency space.
Tenant agencies are responsible for adhering to all applicable environmental, health and safety (EHS) regulations governing their employees and operations within GSA controlled facilities. Agencies are also responsible for providing information to GSA regarding their operation and construction activities that could pose EHS risks to other occupants, visitors or the facility in GSA controlled facilities. GSA facility and leasing managers are responsible for ensuring all required EHS documentation such as: safety data sheets, chemical hygiene plans, chemical inventories, site safety plans, and waste disposal certificates are received from tenant agencies prior to occupancy or when otherwise applicable.

Contractor space. GSA Contracting Officer’s Representatives or other delegated GSA representatives shall ensure contractors provide GSA facility management and regional EHS offices with the environmental, health and safety documentation required in their respective contracts, including but not limited to: training documentation, site specific safety plans, chemical inventories and SDS sheets.
Walking/working surfaces.
As defined by OSHA (29 CFR 1910.22 Subpart D, 29 CFR 1926 Subpart M), these are any vertical or horizontal surfaces individuals use to walk on, work on and/or use to gain access to an area. For GSA employees and GSA controlled facilities, surfaces include: sidewalks, roofs, balconies, ladders, walkways, scaffolds, stairs, lifts, and platforms.

GSA controlled facilities. The Facility Management office, facility manager, and COR with support of the regional EHS office, shall:
1. Maintain all walking/working surfaces in a safe, undamaged state such as to avoid slips, trips or falls to any individual.
2. Ensure all elevated work surfaces of 4 foot height or more (above the next lower level) shall be guarded properly or otherwise protect individuals from falling.
3. Ensure all exit routes are unobstructed.

GSA employees. Employees shall not use any elevated work area device, such as lifts, travel restraint systems, or fall arrest systems without first receiving training in their proper use and care from a qualified individual. Regional EHS staff or their representative shall note any deficiencies or hazards with walking/working surfaces during the periodic facility inspections. The EHS office shall notify the Facility Management office who shall take immediate action as needed to isolate any hazard that poses an immediate danger to individuals, until the deficiency or hazard can be permanently abated. Wet floor areas for example, shall have cones or caution signs posted until the floor has been dried.

Contractors. Service and construction contractors working in GSA controlled facilities shall ensure that all fixed elevated work area equipment and components (e.g., stairs, fixed ladders, parapets, balconies, etc) shall be used in a safe manner, and any portable equipment brought onto the property for use (e.g., lifts, scaffolds, ladders, etc.) are not damaged, and meet ANSI and other applicable standards.

Rooftop work. Only authorized GSA employees, contractors and occupants, in the performance of their duties, shall be allowed on rooftops of GSA facilities. Authorization will only be granted by the GSA Facility Management office, with assistance from the regional EHS office based on legitimate need, adequate rooftop safeguards, and completed training on applicable fall prevention equipment. Below is a flowchart for use by facility managers and others to identify the status and broad needs of any roof area.
Hazard assessment. Roof access and elevated building exteriors shall be evaluated by regional EHS staff or qualified contractors to identify any fall hazards. Hazards shall be communicated to the Facility Management staff, who shall take action to ensure individuals accessing the roof or elevated building exterior are isolated from the hazards. Permanent corrective action shall be taken by the Facility Management office, regional design and construction office or similar PBS support to eliminate the fall hazards. Such action may include but not necessarily be limited to: installing railings or parapets, establish a warning line, post signage, etc.

Roof anchors. Anchors installed on GSA roofs must be tested and certified for use by a qualified engineer, in accordance with current standards. In order to consider the use of anchors, a roof must be evaluated and designed by a qualified engineer. The anchors must then be installed as designed, tested and certified every 10 years by a qualified engineer before they may be used as part of a rope descent system.

Building exterior maintenance. GSA Contracting Officer's Representatives shall ensure contractors hired to perform window washing and other construction or maintenance work on elevated work areas of GSA owned and operated facilities provide a written plan for performing the elevated work in compliance with the contract and OSHA regulations for fall protection systems (29 CFR 1910.29, 29 CFR 1910.140). Each submitted plan shall be reviewed and approved by the regional EHS office or their representative(s) before the contractor may proceed with the elevated work.
APPENDIX A – OSHA Standards and Regulations

29 CFR 1960 - Basic Program Elements for Federal Employee OSH Programs and Related Matters

29 CFR 1926 – Safety and Health Regulations for Construction
   Subpart A – General
   Subpart B – General Interpretations
   Subpart C – General Safety and health Provisions
   Subpart D – Occupational Health and Environmental Controls
   Subpart E – Personal Protective and Life Saving Equipment
   Subpart F – Fire Protection and Prevention
   Subpart G – Signs, Signals and Barricades
   Subpart H – Materials Handling, Storage, Use and Disposal
   Subpart I – Tools, Hand and Power
   Subpart J – Welding and Cutting
   Subpart K – Electrical
   Subpart L – Scaffolds
   Subpart M – Fall Protection
   Subpart N - (1926.552, 1926.554) Material hoists, personnel hoists, elevators, overhead hoists
   Subpart P – Excavations
   Subpart S - (.800) Underground construction
   Subpart T – Demolition
   Subpart W – Rollover Protective Structures; Overhead Protection
   Subpart X – Stairways and Ladders
   Subpart Z – Toxic and Hazardous Substances
   Subpart AA – Confined Spaces in Construction
   Subpart CC – Cranes and Derricks in Construction

29 CFR 1910 – Occupational Safety and health Standards
   Subpart A – General
      1910.1 Purpose and Scope
      1910.2 Definitions
      1910.5 Applicability of standards
      1910.9 Compliance duties owed to each employee
   Subpart D – Walking-working Surfaces
   Subpart E – Exit Routes and Emergency Planning
   Subpart F – Powered Platforms, Manlifts and Vehicle-mounted Work Platforms
   Subpart G – Occupational Health and Environmental Control
      1910.94 Ventilation
      1910.95 Occupational noise exposure
      1910.97 Nonionizing radiation
   Subpart H – Hazardous Materials
      1910.101 Compressed gases (general requirements)
      1010.102 Acetylene
1910.104 Oxygen
1910.106 Flammable Liquids
1910.109 Explosives and blasting agents
1910.120 Hazardous Waste operations and emergency response (HAZWOPER)

Subpart I – Personal Protective Equipment
1910.132 General requirements
1910.133 Eye and face protection
1910.134 Respiratory protection
1910.135 Head protection
1910.137 Electrical protective equipment
1910.138 Hand protection
1910.140 Personal fall protection systems

Subpart J – General Environmental Controls
1910.141 Sanitation
1910.144 Safety color code for marking physical hazards
1910.146 Permit-required Confined Spaces
1910.147 The control of hazardous energy (lockout/tagout)

Subpart K – Medical and First Aid
1910.151(c) Eyewashes and Showers for drenching

Subpart L – Fire Protection

Subpart N – Materials Handling and Storage
1910.178 Powered industrial trucks
1910.179 Overhead and gantry cranes
1910.184 Slings

Subpart O – Machinery and Machine Guarding
1910.212 General requirements for all machines
1910.215 Abrasive wheel machinery
1910.219 Mechanical power transmission apparatus

Subpart P – Hand and Portable Powered Tools and other Hand-held equipment
1910.242 Hand and portable powered equipment, general
1910.243 Guarding of portable powered tools
1910.244 Other portable tools and equipment

Subpart Q – Welding, cutting and brazing

Subpart S – Electrical

Subpart Z – Toxic and Hazardous Substances
1910.1001 Asbestos
1910.1025 Lead
1910.1030 Bloodborne pathogens
1910.1053 Respirable crystalline silica
1910.1096 Ionizing radiation
1910.1200 Hazard Communication