

October 30, 1996

MEMORANDUM FOR ALL REAL PROPERTY LEASING ACTIVITIES  
(PER DISTRIBUTION LIST)

FROM: HILARY PEOPLES (signed)  
ASSISTANT COMMISSIONER FOR  
PROPERTY ACQUISITION AND REALTY SERVICES  
JAMES STEELE (signed)  
ASSISTANT COMMISSIONER FOR  
PROPERTY MANAGEMENT

SUBJECT: Safety and Environmental Procedures in Lease Acquisition

1. Purpose. This acquisition letter issues reengineered safety and environmental procedures for lease acquisitions and implements the Federal Acquisition Reform Act requirement to eliminate non statutory certifications.
2. Background.
  - a. The Lease Acquisition Business Process Redesign report concluded that the lease solicitation for offers (SFO) is too detailed and technical. With regard to safety and environmental procedures, the report recommended greater reliance on local codes and national standards. The changes in this acquisition letter reflect that recommendation.
  - b. GSA leases over 10,000 square feet include GSA requirements for lessor certifications on a number of environmental subjects not required by law. The Federal Acquisition Reform Act of 1995 requires that such certifications be eliminated from contracts unless the Administrator approves their continued use based upon a "justification for the requirement and a determination that there is no less burdensome means for enforcing the particular regulation that contains the certification requirement ...." Accordingly, we will hereafter rely on lease clauses *without certifications*.
3. Effective Date/Expiration Date. These instructions and SFO changes are effective for all new SFOs prepared on or after the date of issuance, and will expire 12 months from the date of issuance, unless extended. Specialists may amend SFOs for ongoing acquisitions as deemed appropriate.
4. Cancellation. Acquisition letter PQRP-94-08, *Safety and Environmental Procedures in Lease Acquisition*, dated November 8, 1994, is canceled.
5. Applicability. All real property leasing activities.
6. Instructions/Procedures. The following is a summary of attachments:
  - a. Attachment 1 -- Safety and Environmental Management Business Practices for Lease Acquisition.
  - b. Attachment 2 -- GSA Form 3626, *U.S. Government Lease for Real Property (Short Form)*.
  - c. Attachment 3 -- GSA Form 3517A, *General Clauses (Simplified Leases)*.
  - d. Attachment 4 -- Standard SFO Paragraphs.



**Safety and Environmental Management  
Business Practices for Lease Acquisitions**

1. General.

a. Specialists must assure that --

- (1) Offered space meets or will be upgraded to meet the requirements of the Fire Administration Authorization Act of 1992 (the Fire Act) (see paragraph 2),
- (2) Offered space meets or will be upgraded to meet local fire and safety codes and ordinances as evidenced by a current occupancy permit for the intended Government use, and
- (3) Except for leases less than 6 months, all below grade floors on which the Government will occupy space, including garage areas, and all hazardous areas of *entire* buildings in which the Government is offered space are protected or will be protected by automatic sprinkler systems or an equivalent level of safety.

b. Specialists shall consult Safety and Environmental Management (S&EM) personnel 1) as needed throughout the lease acquisition process, e.g., when occupancy permits are not issued and 2) on layouts for all leases which exceed the simplified lease acquisition threshold.

c. Definitions.

- (1) *Hazardous areas* means those areas in a building referred to as hazardous areas in National Fire Protection Association Standard 101, the Life Safety Code, or any successor standard thereto.
- (2) *Equivalent level of safety* means an alternative design or system (which may include automatic sprinkler systems), based upon fire protection engineering analysis, which achieves a level of safety equal to or greater than that provided by automatic sprinkler systems. (See 41 CFR 101-6.6 for guidance on conducting an equivalent level of safety analysis.)

2. Multi-Story Buildings - All Leases.

- a. Three stories or more. If offered space is 3 stories or more above grade, the contracting officer must obtain, in-house or from the Lessor, written documentation that the building meets egress and fire alarm requirements as established by NFPA Standard No. 101 (current as of date of the solicitation) or equivalent. However, if 1) offered space is 5 stories or less above grade, 2) the total Government leased space in the building (all leases combined) will be less than 35,000 square feet, *and* 3) the building is sprinklered, the documentation is not required.

- b. Six stories or more. The Fire Act requires that when the Federal Government leases 35,000 square feet or more of space, in one or more blocks, with some portion of the space on the 6th floor or above, the *entire* building must be protected by an automatic sprinkler system or an equivalent level of safety. *However*, the installation of an automatic sprinkler system or equivalent level of safety is not required solely as a result of the leasing of space *below* the 6th floor. This exception would apply, for example, if 30,000 square feet is currently leased on the 5th and 6th floors and 10,000 square feet is subsequently leased in a separate action on the 3rd floor.
3. Environmental Certifications and Representations. Offeror's environmental certifications and representations are eliminated.
4. Renewal Options. Paragraphs 1 and 2, above, apply to the exercise of renewal options when the initial lease was entered into after October 26, 1992.
5. Extensions and Expansions. Paragraphs 1 and 2, above, apply to lease extensions and the acquisition of expansion space, whether accomplished through supplemental lease agreement, new lease, or otherwise.
6. Disaster Leases. This acquisition letter applies to the acquisition of long-term replacement space for agencies displaced by a disaster (fire, earthquake, flood, etc.).
7. Temporary Leases. Space leased not longer than 6 months must meet local fire and safety codes and ordinances as evidenced by a current occupancy permit for the intended Government use. For temporary leases that exceed 6 months, paragraphs 1 and 2, above, apply.
8. Equivalent Level of Lifesafety Evaluation Procedures. When an Offeror proposes an equivalent level of lifesafety, the fire protection engineering analysis used to develop the equivalency must be evaluated by qualified Safety and Environmental Management personnel and approved in accordance with the requirements of 41 CFR 101-6.6.
9. SFO Changes. Realty Specialists must include minimum standards in all leases.
  - a. Simplified Lease minimum requirements have been incorporated into GSA Form 3626, *U.S. Government Lease for Real Property (Short Form)* (Attachment 2) and GSA Form 3517A, *General Clauses (Simplified Leases)* (Attachment 3).
  - b. The Standard SFO *Safety and Environmental Management (S&EM)* section for other than Simplified Leases has been modified to implement the above business practices and are shown on Attachment 4. Minimum required paragraphs are indicated below with a superscript M<sup>(M)</sup>.
    - (1) *General Safety and Environmental Requirements (SEP 1991)* and *Code Violations (OCT 1994)* have been replaced by *Fire and Life Safety (OCT 1996)*<sup>M</sup> and *Occupancy Permit (OCT 1996)*<sup>M</sup>.
    - (2) *Sprinkler System (OCT 1996)*, *Manual Fire Alarm Systems (OCT 1996)*, *Asbestos (OCT 1996)*, *Indoor Air Quality (OCT 1996)*, *Radon in Air (OCT 1996)* (new name), *Radon in Water (OCT 1996)*, and *Recycling (OCT 1996)* have been modified to clarify requirements.

- (3) A new *Hazardous Materials (OCT 1996)*<sup>M</sup> paragraph has been added.
  - (4) Optional short versions of *Asbestos (OCT 1996)*<sup>M</sup>, *Indoor Air Quality (OCT 1996)*, *Radon in Air (OCT 1996)*<sup>M</sup>, and *Radon in Water (OCT 1996)* have also been included.
  - (5) The *Recycling (OCT 1996)* paragraph has been modified to require recycling when local markets exist for recovered materials.
  - (6) The paragraphs *Portable Fire Extinguishers (SEP 1991)*, *Standpipes (SEP 1991)*, *Engineered Smoke Control Systems (SEP 1991)*, *Exit and Emergency Lighting*, and *Fire Doors* have been deleted.
  - (7) In addition to the S&EM paragraph changes 1) the long and short versions of *Ventilation (OCT 1996)*<sup>M</sup> have been modified to eliminate the exception to compliance with ASHRAE Standard 62, thereby assuring that all Offerors offer the same level of service, 2) *Elevators (OCT 1996)* has been modified to emphasize code compliance and delete reference to automatic emergency recall, and 3) several other paragraphs have been edited or modified for clarity and consistency with existing policies. These changes are also shown in Attachment 4.
- c. Standard SFO and related forms revised to reflect the above will be distributed by a separate acquisition letter.

## Standard SFO Paragraphs

Note : Minimum required paragraphs are 1.1, 1.2, 1.5, 1.6, 1.9, 1.12, and 2.1. Some of them may be replaced by more detailed paragraphs. Paragraphs 1.3, 1.4, 1.7, 1.8, 1.10, 1.11, 1.13, 2.2, 2.3, 3.1, 3.2, 3.3, and 3.4 are optional.

### **1.0 SAFETY AND ENVIRONMENTAL MANAGEMENT**

#### **1.1. OCCUPANCY PERMIT (OCT 1996) - minimum requirement**

The Lessor shall provide a valid Occupancy Permit for the intended use of the Government and shall maintain and operate the building in conformance with current local codes and ordinances. If the local jurisdiction does not issue occupancy permits, Offerors shall consult the contracting officer to determine if other documentation may be needed.

#### **1.2. FIRE AND LIFE SAFETY (OCT 1996) - minimum requirement**

- (a) Below-grade space to be occupied by Government and all areas in a building referred to as "hazardous areas" in National Fire Protection Association Standard 101, known as the "Life Safety Code," or any successor standard thereto, must be protected by an automatic sprinkler system or an equivalent level of safety.
- (b) If offered space is 3 stories or more above grade, the Lessor shall provide written documentation that the building meets egress and fire alarm requirements as established by NFPA Standard No. 101 or equivalent. However, if 1) offered space is 5 stories or less above grade, 2) the total Government leased space in the building (all leases combined) will be less than 35,000 square feet, and 3) the building is sprinklered, this documentation is not required.
- (c) If offered space is 6 stories or more above grade, additional fire and life safety requirements may apply. Therefore, the offeror must advise GSA in its offer whether or not the offered space, or any part thereof, is on or above the sixth floor of the offered building.

#### **1.3. SPRINKLER SYSTEM (OCT 1996) - optional**

- (a) If any portion of the offered space is on or above the 6th floor, and lease of the offered space will result, either individually or in combination with other Government leases in the offered building, in the Government leasing more than 35,000 BOMA usable square feet of space in the offered building, then the entire building must be protected by an automatic sprinkler system or an equivalent level of safety.
- (b) If an offeror proposes to satisfy any requirement of this clause by providing an equivalent level of safety, the offeror must submit, for Government review and approval, a fire protection engineering analysis, performed by a qualified fire protection engineer, demonstrating that an equivalent level of safety for the offered building exists. Offerors should contact the Contracting Officer for further information regarding Government review and approval of "equivalent level of safety" analyses. (See 41 CFR 101-6.6 for guidance on conducting an equivalent level of safety analysis.)
- (c) Definition: "Equivalent level of safety" means an alternative design or system (which may include automatic sprinkler systems), based upon fire protection engineering analysis, which achieves a level of safety equal to or greater than that provided by automatic sprinkler systems.

#### **1.4. MANUAL FIRE ALARM SYSTEMS (OCT 1996) - optional**

Manual fire alarm systems shall be provided in accordance with NFPA Standard 101 (current as of the date of this solicitation). Systems shall be maintained and tested by the Lessor in accordance

with NFPA Standard 72. The fire alarm system wiring and equipment must be electrically supervised and automatically notify the local fire department (NFPA Standard No. 72) or approved central station. Emergency power must be provided in accordance with NFPA Standards No. 70 and 72.

**1.5. OSHA REQUIREMENTS (OCT 1996) - minimum requirement**

The Lessor shall maintain buildings and space in a safe and healthful condition suitable for the intended occupancy and use according to Occupational Safety and Health Administration (OSHA) standards.

**1.6. ASBESTOS (OCT 1996) - minimum requirement**

The leased space shall be free of all asbestos containing materials, except undamaged asbestos flooring in the space or undamaged boiler or pipe insulation outside the space, in which case an asbestos management program conforming to Environmental Protection Agency guidance shall be implemented.

**1.7. ASBESTOS (OCT 1996) - optional**

- (a) Offers are requested for space with no asbestos-containing materials (ACM), or with ACM in a stable, solid matrix (e.g., asbestos flooring or asbestos cement panels) which is not damaged or subject to damage by routine operations. For purposes of this "Asbestos" paragraph, "space" includes the space offered for lease, common building areas and ventilation systems and zones serving the space offered, and the area above suspended ceilings and engineering space in the same ventilation zone as the space offered. If no offers are received for such space, the Government may consider space with thermal system insulation ACM (e.g., wrapped pipe or boiler lagging) which is not damaged or subject to damage by routine operations.
- (b) Definition. ACM is defined as any materials with a concentration of greater than 1 percent by dry weight of asbestos.
- (c) Space with ACM of any type or condition may be upgraded by the offeror to meet the conditions described in subparagraph (a) by abatement (removal, enclosure, encapsulation, or repair) of ACM not meeting those conditions. If an offer involving abatement of ACM is accepted by the Government, the Lessor shall, prior to occupancy, successfully complete the abatement in accordance with Occupational Safety and Health Administration (OSHA), Environmental Protection Agency (EPA), Department of Transportation (DOT), State, and local regulations and guidance.
- (e) Management plan. If space is offered which contains ACM, the offeror must submit an asbestos-related management plan for acceptance by the Government prior to lease award. This plan must conform to EPA guidance, be implemented prior to occupancy, and be revised promptly when conditions affecting the plan change. If asbestos abatement work is to be performed in the space after occupancy, the Lessor shall submit to the Contracting Officer the occupant safety plan and a description of the methods of abatement and reoccupancy clearance, in accordance with OSHA, EPA, DOT, State, and local regulations and guidance, at least 4 weeks prior to the abatement work.

**1.8. INDOOR AIR QUALITY (OCT 1996) - optional**

- (a) The Lessor shall control contaminants at the source and/or operate the space in such a manner that the GSA indicator levels for carbon monoxide (CO), carbon dioxide (CO<sub>2</sub>), and formaldehyde (HCHO) are not exceeded. The indicator levels for office areas shall be: CO - 9 parts per million (ppm) time-weighted average (TWA - 8-hour sample); CO<sub>2</sub> - 1000 ppm (TWA); formaldehyde - 0.1 ppm (TWA).
- (b) The Lessor shall make a reasonable attempt to apply insecticides (except traps), paints, glues, adhesives, and heating, ventilating and air conditioning (HVAC) system cleaning compounds

with highly volatile or irritating organic compounds, outside of working hours. The Lessor shall provide advance notice to the tenant before applying noxious chemicals in occupied spaces, and adequate ventilation in those spaces during working hours during and after application.

- (c) The Lessor shall, at all, times, supply adequate ventilation to the leased premises with air having contaminants below OSHA or EPA action levels and permissible exposure limits, and without noxious odors or dusts. The Lessor shall conduct HVAC system balancing after all HVAC system alterations, and make a reasonable attempt to schedule major construction outside of office hours.
- (d) The Lessor shall promptly investigate indoor air quality (IAQ) complaints and shall implement controls, including alteration of building operating procedures (e.g., adjusting air intakes, adjusting air distribution, cleaning and maintaining HVAC systems, etc.), to address such complaints.
- (e) The Government reserves the right to conduct independent IAQ assessments and detailed studies in space it occupies, as well as in space serving the Government-leased space (e.g., common use areas, mechanical rooms, HVAC systems, etc.). The Lessor shall assist the Government in its assessments and detailed studies by making available information on building operations and Lessor activities, and providing access to space for assessment and testing, if required, and implement corrective measures required by the Contracting Officer.

#### **1.9. RADON IN AIR (OCT 1996) - minimum requirement**

If space planned for occupancy by the Government is on the second floor above grade or lower, the Lessor shall, prior to occupancy, test the leased space for 2-3 days using charcoal canisters or Electret Ion Chambers to ensure radon in air levels are below the Environmental Protection Agency's action concentration of 4 picoCuries/liter. After the initial testing, a follow-up test for a minimum of 90 days using Alpha Track Detectors or Electret Ion Chambers must be completed.

#### **1.10. RADON IN AIR (OCT 1996) - optional**

- (a) The radon concentration in the air of space leased to the Government shall be less than the Environmental Protection Agency (EPA) action concentration for homes of 4 picoCuries per liter (pCi/L), herein called the "EPA action concentration."
- (b) Initial testing:
  - (1) The Lessor shall test for radon that portion of space planned for occupancy by the Government in ground contact or closest to the ground up to and including the second floor above grade (space on the third or higher floor above grade need not be measured), report the results to the Contracting Officer upon award, and promptly carry out a corrective action program for any radon concentration which equals or exceeds the EPA action level.
  - (2) Testing sequence: The Lessor shall measure radon by the Standard Test in subparagraph (d)(1), completing the Test not later than 150 days after award, unless the Contracting Officer decides that there is not enough time to complete the Test before Government occupancy, in which case the Lessor shall perform the Short Test in subparagraph (d)(2).
  - (3) If the space offered for lease to the Government is in a building under construction or proposed for construction, the Lessor shall, if possible, perform the Standard Test during buildout before Government occupancy of the space. If the Contracting Officer decides that it is not possible to complete the Standard Test before occupancy, the Lessor shall complete the Short Test before occupancy, and the Standard Test not later than 150 days after occupancy.
- (c) Corrective action program:



(1) Program initiation and procedures:

- (i) If the Government or the Lessor detects radon at or above the EPA action level at any time before Government occupancy, the Lessor shall carry out a corrective action program which reduces the concentration to below the EPA action level before Government occupancy.
- (ii) If the Government or the Lessor detects a radon concentration at or above the EPA action level at any time after Government occupancy, the Lessor shall promptly carry out a corrective action program which reduces the concentration to below the EPA action level.
- (iii) If the Government or the Lessor detects a radon concentration at or above the EPA residential occupancy concentration of 200 pCi/L at any time after Government occupancy, the Lessor shall promptly restrict the use of the affected area, and provide comparable temporary space for the tenants, as agreed to by the Government, until the Lessor carries out a prompt corrective action program which reduces the concentration to below the EPA action level and certifies the space for reoccupancy.
- (iv) The Lessor shall provide the Government with prior written notice of any proposed corrective action or tenant relocation. The Lessor shall promptly revise the corrective action program upon any change in building condition or operation which would affect the program or increase the radon concentration to or above the EPA action level.

(2) The Lessor shall perform the Standard Test in subparagraph (d)(1) to assess the effectiveness of a corrective action program. The Lessor may also perform the Short Test in subparagraph (d)(2) to determine whether the space may be occupied, but shall begin the Standard Test concurrently with the Short Test.

(3) All measures to accommodate delay of occupancy, corrective action, tenant relocation, tenant reoccupancy, or follow-up measurement, shall be provided by the Lessor at no additional cost to the Government.

(4) If the Lessor fails to exercise due diligence, or is otherwise unable to reduce the radon concentration promptly to below the EPA action level, the Government may implement a corrective action program and deduct its costs from the rent.

(d) Testing procedures:

(1) Standard Test: Place Alpha Track Detectors or Electret Ion Chambers throughout the required area for 91 or more days so that each covers no more than 2,000 square feet of usable space. Use only devices listed in the EPA Radon Measurement Proficiency (RMP) Program Application Device Checklists. Use a laboratory rated proficient in the EPA Program to analyze the devices. Submit the results and supporting data (sample location, device type, duration, radon measurements, laboratory proficiency certification number, and the signature of a responsible laboratory official) within 30 days after the measurement.

(2) Short Test: Place Alpha Track Detectors for at least 14 days, or Electret Ion Chambers or charcoal canisters for 2 to 3 days, throughout the required area so that each covers no more than 2,000 square feet of usable space, starting not later than 7 days after award. Use only devices listed in the EPA RMP Program Application Device Checklists. Use a laboratory rated proficient in the EPA Program to analyze the devices, and submit the

results and supporting data within 30 days after the measurement. In addition, complete the Standard Test not later than 150 days after Government occupancy.

**1.11. RADON IN WATER (SEP 1991) - optional**

- (a) Two water samples constituting a sampling pair shall be taken from the same location for quality control. They shall be obtained inside the building and as near the non-public water source as is practical, in accordance with EPA's "Radon In Water Sampling Program Manual." Analysis of water samples for radon must be performed by a laboratory that uses the analytical procedures as described in EPA's "Two Test Procedures For Radon In Drinking Water."
- (b) The Lessor shall perform the necessary radon testing and submit a certification to the Contracting Officer before the Government occupies the space.
- (c) If the EPA action level is reached or exceeded, the Lessor shall institute abatement methods, such as aeration, which reduce the radon to below the EPA action level prior to occupancy by the Government, and are promptly revised when building conditions which would or do affect the program change.

**1.12. HAZARDOUS MATERIALS (OCT 1996) - minimum requirement**

The leased space shall be free of hazardous materials according to applicable Federal, State, and local environmental regulations.

**1.13. RECYCLING (OCT 1996) - optional**

Where State and/or local law, code or ordinance require recycling programs for the space to be provided pursuant to this solicitation, the successful offeror shall comply with such State and/or local law, code or ordinance in accordance with the paragraph of the General Clauses entitled "Compliance with Applicable Law." In all other cases, the successful offeror shall establish a recycling program in the leased space where local markets for recovered materials exist. The Lessor agrees, upon request, to provide the Government with additional information concerning recycling programs maintained in the building and the leased space.

**2.0 MECHANICAL, ELECTRICAL, PLUMBING**

**2.1. VENTILATION (OCT 1996) - minimum requirement**

During working hours in periods of heating and cooling, ventilation shall be provided in accordance with ASHRAE Standard 62, Ventilation for Acceptable Indoor Air Quality.

**2.2. VENTILATION (OCT 1996) - optional**

- (a) During working hours in periods of heating and cooling, ventilation shall be provided in accordance with ASHRAE Standard 62, Ventilation for Acceptable Indoor Air Quality.
- (b) Conference rooms of \_\_\_\_\_ usable square feet or greater shall be provided with a dedicated source of ventilation or be fitted with air handling equipment with smoke/odor removing filters.
- (c) Where the Lessor proposes that the Government should pay utilities:
  - (1) An automatic air or water economizer cycle must be provided to all air handling equipment, where practicable.
  - (2) The building shall have a fully functional building automation system (BAS) capable of control, regulation, and monitoring of all environmental conditioning equipment. The BAS shall be fully supported by a service and maintenance contract.

**2.3. ELEVATORS (OCT 1996) - optional**

- (a) The Lessor shall provide suitable passenger and freight elevator service to all GSA-leased space not having ground level access. Service shall be available during the hours specified in

the paragraph entitled "Normal Hours" in the "Services, Utilities, Maintenance" section of this solicitation.

(b) **CODE:**

Elevators shall conform to the current editions of the American National Standard A17.1, Safety Code for Elevators and Escalators, except that elevator cabs are not required to have a visual or audible signal to notify passengers during automatic recall. The elevator shall be inspected and maintained in accordance with the current requirements of the American National Standard A17.2, Inspector's Manual for Elevators.

### **3.0 MISCELLANEOUS SFO PARAGRAPH CHANGES**

#### **3.1. OCCUPATIONAL PROTECTION, HEALTH AND ENVIRONMENTAL SAFETY (OCT 1996) - optional**

The leased space shall not expose the occupant to undue safety and environmental risks.

#### **3.2. LANDSCAPING (OCT 1996) - optional**

Where topographical conditions permit, the site shall be landscaped for low maintenance and water conservation with plants that are either native or well-adapted to local growing conditions. The Contracting Officer shall approve the landscaping to be provided.

#### **3.3. TOILET ROOMS: FIXTURE SCHEDULE (OCT 1996) - optional**

(a) The toilet fixture schedules specified below shall be applied to each full floor based on one person for each 135 BOMA usable square feet of office space in a ratio of \_\_\_\_\_ percent men and \_\_\_\_\_ percent women:

(b) Refer to the schedule separately for each sex...(No Change - deleted from this attachment to save space)

(c) For new installations:

(1) Water closets shall not use more than 1.6 gallons per flush.

(2) Urinals shall not use more than 1.0 gallons per flush.

(3) Faucets shall not use more than 2.5 gallons per minute at a flowing water pressure of 80 psi.

#### **3.4. MAINTENANCE AND TESTING OF SYSTEMS (OCT 1996) - optional**

(a) The Lessor is responsible for the total maintenance and repair of the leased premises. Such maintenance and repairs include site and private access roads. All equipment and systems shall be maintained to provide reliable, energy efficient service without unusual interruption, disturbing noises, exposure to fire or safety hazards, uncomfortable drafts, excessive air velocities, or unusual emissions of dirt. The Lessor's maintenance responsibility includes initial supply and replacement of all supplies, materials, and equipment necessary for such maintenance. Maintenance, testing, and inspection of appropriate equipment and systems must be done in accordance with applicable codes, and inspection certificates must be displayed as appropriate. Copies of all records in this regard shall be forwarded to the Field Office Manager or a designated representative.

(b) Without any additional charge, the Government reserves the right to require documentation of proper operations or testing prior to occupancy of such systems as fire alarm, sprinkler, emergency generator, etc. to ensure proper operation. These tests shall be witnessed by a representative of the Contracting Officer.