



WICC II Work Instruction

DIRECTIVE NO. WICCII-SOW-08.HW10.007496 **APPROVED BY Signature:** Original Signed by
EFFECTIVE DATE: 9-02-2016 **NAME:** Marianne Simko
EXPIRATION DATE: 9-02-2021 **TITLE:** Division Manager Medical and Environmental Division

Responsible Office: LJT/WICCII/Environmental Office

Title: Hazardous Waste: Preparing Hazardous Waste for Shipment

PREFACE

P.1 PURPOSE

The purpose of this Work Instruction (WI) is to establish the procedures to ensure that Hazardous Waste (HW) shipments are properly prepared for transport and ultimate disposal. Hazardous Waste Manifests (HWM) shall be used whenever NASA transports HW or offers HW for transportation, to an off-site treatment, storage, or disposal facility (TSDF). The off-site HW Contractor, as a service to NASA, prepares the HWM and associated documentation for each shipment. WICC Environmental personnel verify that containers are properly identified and labeled, and that documentation is consistent. Environmental personnel also verify the accuracy of the manifest prior to NASA signature.

THE GENERATOR (WFF) IS ULTIMATELY RESPONSIBLE FOR THE “ACCURACY OF” INFORMATION INCLUDED ON THE MANIFEST.

P.2 APPLICABILITY

This WI applies to environmental management services performed by the WICC Environmental Office at NASA Goddard Space Flight Center’s Wallops Flight Facility (WFF), Wallops Island, Virginia.

P.3 REFERENCES

- Code of Federal Regulations (CFR), Title 40, Parts 260-282
- 49 C.F.R., SUBCHARTER C—Hazardous Materials Regulations
- Goddard Procedural Requirement (GPR) 8500.3, Waste Management

P.4 CANCELLATION

P.5 TOOLS, EQUIPMENT, AND MATERIALS

- Personal protective equipment (PPE; Level D recommended)
- Bung wrench
- Drum cart
- Absorbent pads
- Labels: HW, Non-Regulated, and PCB
- Permanent drum markers
- Tool box

P.6 SAFETY PRECAUTIONS AND WARNINGS

TO VERIFY THIS IS THE CORRECT VERSION, CHECK THE WICCII WIIMS SYSTEM AT
<https://wiims.wff.nasa.gov/WIIMSportal/portal-II.jsp> PRIOR TO USE.

- Wear appropriate PPE.
- Follow Hazardous Waste Management Job Hazard Analysis.
- Technicians performing these task should be HAZWOPER certified in accordance with 29CFR1910.120
- Make sure containers are closed tightly before offering them for transportation.
- Observe proper lifting/loading techniques.

P.7 TRAINING

- HAZCOM
- HAZWOPER
- DOT training

P.8 RECORDS

Record Title	Record Custodian	Retention
HAZARDOUS WASTE MANIFEST Form (HWM)	NASA WFF Medical and Environmental Management Division (MEMD) Range and NASA WFF Mission Management Office (RMMO), and NASA WFF Logistics Management Division (LMD)	*NRRS_8/23A9 Cut off annually. Destroy with concurrence of Center or NASA Counsel’s Office 75 years after cutoff or when no longer needed, whichever is later.
LAND DISPOSAL RESTRICTIONS form (LDR)	RMMO, LMD, and MEMD	*NRRS_8/23A9 Cut off annually. Destroy with concurrence of Center or NASA Counsel’s Office 75 years after cutoff or when no longer needed, whichever is later.
CONTAINER CONTENTS form	MEMD	*NRRS_8/23A9 Cut off annually. Destroy with concurrence of Center or NASA Counsel’s Office 75 years after cutoff or when no longer needed, whichever is later.

* *NRRS – NASA Records Retention Schedule ([NPR 1441.1](#))*

P.9 MEASUREMENT/VERIFICATION

INSTRUCTIONS

In this document, a requirement is identified by “shall,” a good practice by “should,” permission by “may” or “can,” expectation by “will,” and descriptive material by “is.”

1. Ensure all containers are closed tightly and in good condition for transportation off-site.
2. Ensure all containers are labeled and the information is complete, correct, and accurate. All hazardous waste containers should have HW labels. All hazardous materials should have hazardous materials classification labels. All non-regulated containers should have “ non-reg” labels.
3. Compare the Department of Transportation (DOT) shipping names on the HW labels to the DOT shipping names on the manifest for accuracy. The DOT description should include the Proper Shipping Name, Hazard Class, and the EPA waste identification number.
4. Weigh all drums with the portable scale or estimate weight of containers. The difference between the portable scale weight/ estimated weight and the transporters estimated weight should not vary more than 5-10 percent.
5. The off-site HW contractor shall prepare the container content forms for each container, HWM, and Land Disposal Restriction (LDR) form for the shipment.
6. Verify that the container content forms and the manifest information accurately reflect the actual materials present in each container to be transported. Make sure that all Underlying Hazardous Constituents are identified for applicable wastes.
7. After the off-site contractor has loaded the truck, check to verify that the number of containers on the transporter vehicle matches the number of containers on the container content sheets and manifest.
8. Verify that the manifest is assigned a 5 digit number and includes the generator and transporter's names, mailing addresses, EPA Identification numbers, and that the telephone numbers are entered in the appropriate boxes.
9. Cross-reference container contents with manifest information to determine if waste to be shipped is accurately reflected on the manifest. Also, cross-reference the container content forms with the LDR forms to make sure all EPA ID numbers listed on the manifest and container content forms are accounted for on the LDR.
10. When the HW shipment is completed, contact a NASA DOT and HAZWOPER trained representative to sign the manifest and LDR. The WICC Environmental Manager or his representative must sign all billing sheets.

ONLY NASA OR TENANT DESIGNATED EMPLOYEES MAY SIGN THE MANIFEST.

11. File and mail manifest copies as required by State and Federal law.
12. If second copy is not received from the TSDF in 45 days, contact the TSDF. Have them immediately fax and then mail a copy.

RESPONSIBILITIES

1. Supervisors shall:
 - a. Provide this work instruction to all employees prior to their encountering the subject activity and ensure that these steps are followed by periodic audit, testing, or retraining.
 - b. Revise this work instructions as practices or requirements change and prior to the expiration date.
2. Employees shall:
 - a. Follow safety precautions, warnings and instructions as described above.
 - b. Notify their supervisor when they become aware of changes in practice or regulation which requires an update to this work instruction.

Appendix A – Definitions

- **CONTAINER CONTENTS form:** Provides a detailed description of the contents of each container in the shipment.
- **HAZARDOUS WASTE MANIFEST Form (HWM):** The document that is originated and signed by the generator which contains information specific to the hazardous waste shipment. This form must be completed before waste is offered for transportation off-site. Most states have their own HWM. The HWM of the state receiving the waste must be used to ship the waste. If the receiving state does not have a HWM, the HWM of the generating state is used. If neither state has a HWM, an EPA uniform HWM is used.
- **LAND DISPOSAL RESTRICTIONS form (LDR):** Documentation that accompanies the hazardous waste manifest and identifies the applicable treatment standards and disposal restrictions of each shipment.

Appendix B – Acronyms

N/A

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EFFECTIVE DATE: 9-02-2016
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CHANGE HISTORY LOG

Revision	Effective Date	Description of Changes
A		Initial Release
B**		

***subsequent revisions will be alphabetical beginning with B. If this is the baseline version, leave this and the remaining revision blocks blank*