

EMP Action Items - FY 2020 Q1				NOTES					
Hazardous Waste (Medium Priority)									
Met on November 18, 2019: M.Lindsey, M. Simko, S. Whealton, K. Yargus, D. Bruner									
Objective: To manage hazardous waste in a manner that complies with regulations and prevent releases to the environment									
Target:									
1) Manage the generation and proper disposal of hazardous waste									
2) Manage the transportation of hazardous waste									
3) Manage the treatment of hazardous waste									
	Start Date	Completion	Responsibility						
<b>1) Manage the generation and proper disposal of hazardous waste</b>	FY Q1 2020	FY Q4 2020	M Simko D Bruner S Whealton						
a) Check universal waste accumulation start date tracking spreadsheet quarterly	FY Q1 2020	FY Q4 2020	S Whealton						
b) Continue documentation of HW generation processes at WFF through building inspections and interviews	FY Q1 2020	FY Q4 2020	M Simko D Bruner S Whealton						
c) HW program (Code 250) personnel attend annual WFF and external training	FY Q1 2020	FY Q4 2020	M Simko S Whealton D Bruner						
d) Create an interactive annual HW generator training which includes lessons learned	FY Q2 2020	FY Q4 2020	M Simko D Bruner						
e) Communicate with tenants	FY Q1 2020	FY Q4 2020	M Simko D Bruner						
i) communicate regulatory updates	FY Q1 2020	FY Q4 2020	M Simko D Bruner						
ii) annually inspect tenants and prior to inspections	FY Q1 2020	FY Q4 2020	M Simko D Bruner						
f) Complete biennial HW report (Due 3/1/2020)	FY Q2 2020	FY Q2 2020	M Simko D Bruner						
<b>2) Manage the transportation of hazardous waste</b>	FY Q1 2020	FY Q4 2020	M Simko D Bruner						

NASA Lead \_\_\_\_\_  
 Contract Lead \_\_\_\_\_  
 EMS Support \_\_\_\_\_

a) Annually and before each audit, review the transporter records (manifests)	FY Q1 2020	FY Q4 2020	M Simko D Bruner						
b) Coordinate the writing of the manifest	FY Q1 2020	FY Q4 2020	M Simko D Bruner						
<b>3) Manage the treatment of hazardous waste</b>	FY Q1 2020	FY Q4 2020	M Simko D Bruner						
a) Annually and before each audit, review the OB records which includes training records, the annual record, and records from each open burning event	FY Q1 2020	FY Q4 2020	M Simko D Bruner						
b) Complete groundwater and soil monitoring in accordance with the OB permit	FY Q1 2020	FY Q4 2020	M Simko D Bruner						
i) Complete semiannual monitoring and report	FY Q1 2020	FY Q4 2020	M Simko D Bruner	soil sampling completed 11/6/2019					
ii) Complete annual monitoring and annual report (due March 1 each year)	FY Q1 2020	FY Q2 2020	M Simko D Bruner						
c) Complete 5-year alternatives analysis	FY Q4 2022	FY Q3 2023	M Simko D Bruner						
d) Complete annual rocket motor inspection spreadsheet	FY Q1 2020	FY Q4 2020	M Simko D Bruner	Completed 10/16/2019					
e) Renew the OB permit	FY Q1 2027	FY Q3 2028	M Simko D Bruner						
f) When circumstances dictate, develop a less-than-90-day area	FY Q1 2020	FY Q4 2020	M Simko D Bruner						
g) Complete source determination for perchlorate exceedances at MW2	FY Q1 2020	FY Q4 2020	M Simko D Bruner						
<b>Resources:</b>									
Time: 0.25 FTE 1.3 WYE (contractor)									
People: \$2,520 TSDF Annual Fee and \$900 Large Quantity Generator fee									
Money: \$56,000 OB Permit Renewal									
~ \$108,000 OB Risk Assessment for Permit Renewal									
<b>Training:</b>									
Annual RCRA Training									

NASA Lead \_\_\_\_\_  
 Contract Lead \_\_\_\_\_  
 EMS Support \_\_\_\_\_

Annual Hazwoper						
Triennial DOT Training						
Code 250 HW personnel external training						
<b>Monitoring and Measurement:</b>						
Annual SAA Inspections						
Weekly Central Accumulation Area Inspections						
Biennial Report						
Pounds of Hazardous Waste generated						
External inspections						
<b>Records:</b>						
HW Manifest						
Weekly CAA inspections						
SAA inspections						
Waste Profiles						
Biennial reports						
OB Annual Records						
HW Disposal Inventory Forms						





