



## Procedures and Guidelines (PG)

**DIRECTIVE NO.** 250-PG-8500.3.3D  
**EFFECTIVE DATE:** 10/18/2019  
**EXPIRATION DATE:** 10/18/2024

**APPROVED BY Signature:** Original signed by  
**NAME:** Kimberly Finch, P.E.  
**TITLE:** Chief, Medical and Environmental Management Division

### COMPLIANCE IS MANDATORY

**Responsible Office:** Code 250/ Medical and Environmental Management Division (MEMD)

**Title:** Less-than 90-Day Facility and Program Procedures

## PREFACE

### P.1 PURPOSE

This document defines the procedures and requirements for managing hazardous waste at a less-than-90-day facility. The MEMD managed less-than 90-day facility is located at building 27A. The less-than 90-day facility also includes a white “HazStore” shed and building 27B, located to the north of the main loading dock, within the fence line of the facility. The requirements identified in this document will also apply to all other less-than 90-day facilities that may arise due to needs of specialized waste generation activities and will be managed by MEMD.

### P.2 APPLICABILITY

This document applies to all personnel working at building 27A and any other less-than 90-day facilities located at Goddard Space Flight Center (GSFC) in Greenbelt, Maryland.

- a. In this document citations are assumed to be the latest version unless otherwise noted.
- b. In this document, all mandatory actions (i.e., requirements) are denoted by statements containing the term “shall.” The terms “may” or “can” denote discretionary privilege or permission; “should” denotes a good practice and is recommended but not required; “will” denotes expected outcome; and “are/is” denotes descriptive material.

### P.3 AUTHORITY

GPR 8500.3 Waste Management

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<http://gdms.gsfc.nasa.gov> TO VERIFY THAT THIS IS THE CORRECT VERSION PRIOR TO USE.

#### **P.4 APPLICABLE DOCUMENTS AND FORMS**

- a. NASA Goddard Space Flight Center’s Integrated Contingency Plan
- b. 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response
- c. 40 CFR 260-265, Hazardous Waste Management System-General
- d. 40 CFR 268, Land Disposal Restrictions
- e. 49 CFR 172.101- Subpart B, Table of Hazardous Materials and Special Provisions
- f. COMAR 26.13.03, Standards Applicable to Generators of Hazardous Waste
- g. National Fire Protection Association (NFPA) 70 National Electrical Code
- h. Enforcement and Compliance History Online (ECHO) Report
- i. 250-WI-8500.3.2 Hazardous Waste Data Entry and Validation
- j. 270-WI-4520.2.2, Receiving Operations
- k. 250-WAP, Waste Analysis Plan

#### **P.5 CANCELLATION**

250-PG-8500.3.3C Less-than 90-Day Waste Accumulation Facility and Program Procedures

#### **P.6 SAFETY**

Employees working at any less-than-90-day facility located at Greenbelt shall review waste profiles, Safety Data Sheets (SDSs)/Material Safety Data Sheets (MSDSs), and any other appropriate information on the hazards of the waste materials prior to working with any waste. After reviewing appropriate references, proper Personal Protective Equipment (PPE) requirements will be determined. An inventory of PPE is available at the less-than-90-day facility located at building 27A and the list can be found in Appendix C of this document. PPE inventory for all other less-than 90-Day Facilities must be documented in Appendix C of this document and in the GSFC Integrated Contingency Plan (ICP).

#### **P.7 TRAINING**

RCRA requires a detailed job description and required training be documented for each employee working in a less-than 90-day facility. Employees shall be trained according to the job description documented in this procedure. Refer to Appendix G for a list of training modules required for each job description.

#### **P.8 RECORDS**

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| <b>Record Title</b> | <b>Record Custodian</b> | <b>Retention</b>   |
|---------------------|-------------------------|--|
| TSDF Audit Report   | MEMD                    | *NRRS 8/23.5A3a Destroy 3 years after superseded or when no longer needed, whichever is later. |

\* NRRS 1441.1 – NASA Records Retention Schedule

## **P.9 MEASUREMENT/VERIFICATION**

Data gathered from GSFC waste activities at any less-than 90-day facility are required by environmental regulatory agencies. These data are used for a variety of required regulatory reports and MEMD reports to track metrics, chemical reuse, recycling, trending, and other waste activities on Center.

Data gathered from managing any less-than 90-day facility are used to support compliance standards, waste minimization efforts and cost tracking. The metrics that are periodically reviewed and updated include:

1. Waste disposal cost per pound will be calculated by using a running 24-month sum of weight shipped, divided by the running 24-month sum of disposal cost from the contractors monthly reports.
2. Container management cost will be calculated using a running 24-month sum of all other expenses incurred from the waste program (e.g. monthly labor hours, containers managed, supplies, lab costs, etc.).

## **PROCEDURES**

The following procedures apply to operations at the less-than 90-day facility.

### **1. Waste Management**

#### **1.1 Satellite Accumulation Area (SAA) Responsibilities**

Responsibilities of the SAA Point of Contact (POC) are defined in GPR 8500.3 Section 1.

#### **1.2 MEMD Responsibilities**

1.2.1 MEMD properly documents all new SAAs.

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1.2.2 MEMD maintains a record of all waste that has been generated at GSFC that is disposed of in coordination with MEMD.

1.2.3 Samples may be collected to assist in further characterizing hazardous waste that is generated in accordance with the Waste Analysis Plan (250-WAP).

### **1.3 Operational Procedures**

1.3.1 Centrifuge Operations – When using the centrifuge to process non-chlorinated solvent wipes the area surrounding the operation shall be considered electrically classified. During operations all electronics within a 3-foot radius of the equipment must meet the requirements listed in NFPA 70 National Electrical Code for Class 1 Division 1 (i.e. personal electronics such as cell phones may not be within this area). This area is designated by stations, warning signs and markings on the floor surrounding the equipment, when in operation. For areas outside the 3-foot radius but inside a 5-foot radius of the centrifuge all electronics must meet the requirements listed in NFPA 70 National Electrical Code for Class 1 Division 2. This area will also be designated by physical barriers and signs.

1.3.2 Transfer of flammable liquids – When transferring flammable liquids, the area surrounding the operation is considered electrically classified. During transferring operations all electronics inside rooms 105B, 105C and 105D must meet the requirements listed in NFPA 70 National Electrical Code for Class 1 Division 1 (i.e. personal electronics such as cell phones may not be within this area). This area is designated by signs, floor markings and this procedure when in operation.

## **2. Container Management**

### **2.1 Work Schedule**

2.1.1 The schedule must allow adequate time for:

- a. Properly responding, scheduling and evaluating all requests for waste pick-ups and characterizations.
- b. Ensuring all containers that are received into the facility are properly managed and are in full regulatory compliance prior to the last person leaving the facility at the end of the workday.
- c. Adequate time to validate analytical results from sampling; perform weekly inspections; validate inventory and profiles; properly track manifests; and other waste management activities necessary to maintain compliance and minimize risk to GSFC regarding waste management.

### **2.2 Work Plan**

2.2.1 The contractor managing the facility is responsible for developing and maintaining a written work plan that details how the criteria listed in section 2.1.1 will be accomplished.

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2.2.2 The plan will be reviewed annually and made available (located in E-4.5.4 Less than 90 Day Fac\27A file folder) for review to the NASA Hazardous Waste Program Manager at any time.

### 2.3 Waste Pick-up and Check-in

2.3.1 Upon the submission of a Management Operations Services and Information (MOSI) ticket, contact shall be made with the generator to schedule a pick-up of the waste. If the pick-up is canceled due to poor weather conditions, MEMD shall reschedule the pick-up as soon as possible.

2.3.2 At the generator site, prior to the pick-up, all waste must be validated against the current waste profile on record. Such validation points include, but are not limited to: color, phase, viscosity of fluid, layering, pH, etc. If the waste cannot be validated against the current waste profile, an interview with the generator shall be scheduled to confirm or reevaluate the characteristics of the waste.

2.3.3 If a sample is required to characterize the waste, the sample shall be taken in accordance with the Waste Analysis Plan (250-WAP). At this point, a separate ticket will be created in the MOSI system for a 'Request for Material Characterization'.

2.3.4 Upon receipt of waste at building 27A or any less-than 90-day facility, information will be entered into the hazardous waste database and an accumulation start date assigned, with the exception of universal waste. For universal waste an accumulation start date is assigned when the universal waste container is delivered to the waste generator.

### 2.4 Inventory

2.4.1 Accumulation start dates are monitored weekly using the inventory report generated from the hazardous waste database. Quarterly disposal dates shall be scheduled to ensure timely disposal of all waste.

2.4.2 Data is entered into the hazardous waste database in accordance with the 250-WI-8500.3.2.

**2.5 Container Log Report:** A log of all waste currently in inventory at building 27A or any less-than 90-day facility can be printed from the hazardous waste database. This report can subdivide the inventory by room (if applicable) and list each container in that location.

**2.6 Consolidation Log Report:** A log of all waste can be printed from the hazardous waste database that has been consolidated (bulked) into a container other than the one in which it was received.

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**2.7 Container Storage:** All waste collected and stored in the less-than 90-day facility shall comply with regulations set in 49 CFR 172.101, Hazardous Material Table, column (5); and also shall comply with GPR 8500.3, and 40 CFR 265 subparts I, AA, BB and CC.

**2.8 Inventory Identification Number:** At the time a container request becomes a created container, the hazardous waste database will assign a unique serial number to the created container. That number will be used to track all information related to the waste inside that container.

**2.9 Labeling:** Labels are generated using the hazardous waste database. Each label contains the unique container number (also in a barcode), waste profile number, type of waste (hazardous, non-hazardous or universal), waste stream, waste category (i.e. toxic, corrosive, flammable), and accumulation start date. Each label shall meet the regulations of 40 CFR 262.31.

## **2.10 Segregation**

2.10.1 Containers are segregated based on physical and chemical composition, waste characteristics, and reactivity.

2.10.2 Containers are stored in the less-than 90-day facility according to segregation requirements based on the contained materials.

2.10.3 Wastes with a 2 or 3 part mixture should not be stored together.

**2.11 Storage:** The less-than 90-day facility was designed to store hazardous waste in accordance with Federal regulations. Separate rooms have been created to store compatible materials within this structure. Each storage area is equipped with secondary containment meeting the regulatory requirements for this structure. A facility floor plan is located in Appendix D of this document for proper storage and segregation. Appendix F lists the locations and EPA ID numbers for hazardous waste storage areas at Greenbelt.

2.11.1 While waste is stored in building 27A or any less-than 90-day facility all labels and relevant markings shall be clearly visible.

2.11.2 Storage areas shall allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of the facility operation in an emergency, *unless* space is not needed for any of these purposes.

## **2.12 Weekly Inspections**

2.12.1 Weekly inspections shall be carried out no later than every seven (7) calendar days.

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2.12.2 Weekly inspections shall satisfy all regulatory requirements for container integrity, labeling, facility integrity and general housekeeping to include requirements for the GSFC Storm Water Pollution and Prevention Plan (SWPPP) Inspection Guidelines. All spill and emergency equipment will be tested on a regular basis to ensure proper working order and a list of any discrepancies found during the inspections must be noted. A supplemental document may be generated to show the corrective action taken to satisfy the regulatory requirements.

### 3. Disposal

#### 3.1 Method

3.1.1 The inventory report will print the oldest accumulation start date within the current inventory. Arrangements are made with an approved disposal contractor (see 3.2) to remove the waste from all less-than 90-day facilities to an off-site Treatment, Storage, and Disposal facility (TSDF) meeting all regulatory requirements.

3.1.2 All waste characterization shall be completed prior to shipping any waste off-site.

**3.2 TSDF Audits:** MEMD approves disposal facilities prior to conducting any business using the transporter or disposal facility. Before using a new disposal facility, a TSDF audit shall be completed (Appendix H).

3.2.1 In order to verify compliance with RCRA regulations, MEMD must conduct a due diligence review of each designated facility to receive RCRA Subtitle C GSFC waste as defined in 40 CFR 260.10 *Designated Facility*. An annual desk audit will be conducted by examining the facility's compliance history using data obtained through the U.S. Environmental Protection Agency Enforcement and Compliance History Online (ECHO) website, information provided by the facility (including recent inspections by regulatory agencies), and if necessary, discussion with State and/or Federal regulatory agencies. Qualitative assessment of risk to GSFC will be made based upon the quantity and type of wastes being received from GSFC, and the facility's compliance history. This information will be used by the Chief of the MEMD to determine if a site audit should be conducted and if use of the facility should be approved.

3.2.2 The desk audit will begin with an examination of the facility's compliance history using data obtained through the ECHO website. The facility will be contacted and a copy of their audit book and last RCRA inspection will be requested and reviewed. Compliance with all current permits will be examined. This review shall include, but is not limited to, water discharge, air, ground water, RCRA Part B, and/or other permits issued by federal, state, and local agencies. Each Notice of Violation or

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finding will be evaluated by MEMD to determine if the facility's compliance history is a risk to GSFC. The evaluation shall be documented as described below.

- a. Documentation of the desk audit shall consist of a completed Checklist, Part 1, summarizing the review, the ECHO report, the audit book (if provided), and the latest RCRA inspection. If a site visit is required, it will be documented using the Checklist, Part B. The Checklist is found in Appendix H.
- b. If the MEMD Chief concludes, based on the compliance history, audit book review and review of the latest RCRA inspection, that a site audit is needed, MEMD staff will contact the TSDf and schedule the site visit as soon as practical. The individual assigned to conduct the inspection will coordinate with the TSDf to ensure that all training requirements are met prior to conducting the inspection.

3.2.3 A report consisting of the documentation listed above will be completed for each TSDf requiring approval. The report will be submitted to the MEMD Chief through the Hazardous Waste Program Manager for approval. The reports will be completed within ten working days of a determination of intent to use a new facility or previously approved facility with no review in the past year. Annual reviews will be conducted following the schedule of Environmental Program Management Deliverables.

3.2.4 The MEMD Chief will give the approval for each facility proposed to receive waste from GSFC. Once approval from the MEMD Chief has been granted, arrangements can be made for waste disposal at an approved TSDf facility. The list of approved MEMD TSDfs will be located in E-4.6 TSDf Audits\MEMD approved file folder.

### **3.3 Waste Disposal Documents**

3.3.1 The TSDf or any disposal facility must be contacted within 30 days of the waste disposal shipment to validate the status of the waste if the appropriate returned manifest, shipping paperwork, or bill of lading is not received by MEMD at that time. Any manifest sent out with PCB waste/items shall receive a certificate of disposal within that same time period.

3.3.2 A generator whose hazardous waste manifest for an interstate shipment has not been returned to the generator within the prescribed time (45 days) shall give notice of that to the State in which the designated facility is located, the State in which the shipment may have been delivered (or to the EPA in the case of an unauthorized State), and to the Department of Transportation.

## **4. Security**

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**4.1** The permanent less-than 90-day facility is located on the GSFC east of Hubble Road. There is a security fence around the perimeter of the less-than 90-day facility located at building 27A. Entry to building 27A area requires either a key or a code to open the pedestrian gate lock or a code to open the main gate for vehicular access.

**4.2** Visitors to building 27A or any less-than 90-day facility must be accompanied by a MEMD employee with a NASA Personal Identity Verification (PIV) badge. Temporary badge employees are not permitted to accompany visitors. All visitors must check in at the main security building and must pass through a guarded security gate before entering the less-than 90-day facility located at 27A. A visitor briefing shall be given prior to entering building 27A (Appendix E).

**4.3** Employees working within any less-than 90-day facility that do not perform waste management operations that are trained in accordance with this PG do not require an escort (No Escort Visitor).

## **5. Transportation**

**5.1** All hazardous waste/material carriers are inspected in accordance with 270-WI-4520.2.2.

**5.2** All carriers transporting waste for GSFC shall have a security plan in place. MEMD will review a copy of the carriers' security plan prior to shipping.

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### **Appendix A – Definitions**

- A.1 Hazardous Waste Database - The waste management system database used for tracking Satellite Accumulation Areas throughout GSFC and their associated waste streams. Also used for tracking inventory at the less-than 90-day facility for required reports and metrics (currently the Hazardous Materials Management System).
- A.2 Escort Visitor - Anyone that enters any less-than 90-day facility who is not permanently assigned to work at that location or is not a member of the MEMD Environmental Team.
- A.3 No Escort Visitor - Employees working within any less-than 90-day facility that do not perform waste management operations that are trained in accordance with this PG.
- A.4 Waste Profile - A description of the physical and chemical properties of a material, taking into account the process from which the waste was generated.

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### Appendix B – Acronyms

|       |  |
|-------|--|
| CFR   | Code of Federal Regulations                    |
| DOT   | Department of Transportation                   |
| ECHO  | Enforcement and Compliance History Online      |
| EPA   | Environmental Protection Agency                |
| GSFC  | Goddard Space Flight Center                    |
| HW    | Hazardous Waste                                |
| ICP   | Integrated Contingency Plan                    |
| MDE   | Maryland Department of the Environment         |
| MEMD  | Medical and Environmental Management Division  |
| MOSI  | Management Operations Services and Information |
| NFPA  | National Fire Protection Association           |
| NRRS  | NASA Records Retention Schedule                |
| PG    | Procedures and Guidelines                      |
| POC   | Point of Contact                               |
| PPE   | Personal Protective Equipment                  |
| RCRA  | Resource Conservation and Recovery Act         |
| SAA   | Satellite Accumulation Area                    |
| SDS   | Safety Data Sheet                              |
| SWPPP | Stormwater Pollution and Prevention Plan       |
| TSDf  | Treatment, Storage, and Disposal Facility      |
| WAP   | Waste Analysis Plan                            |

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## Appendix C

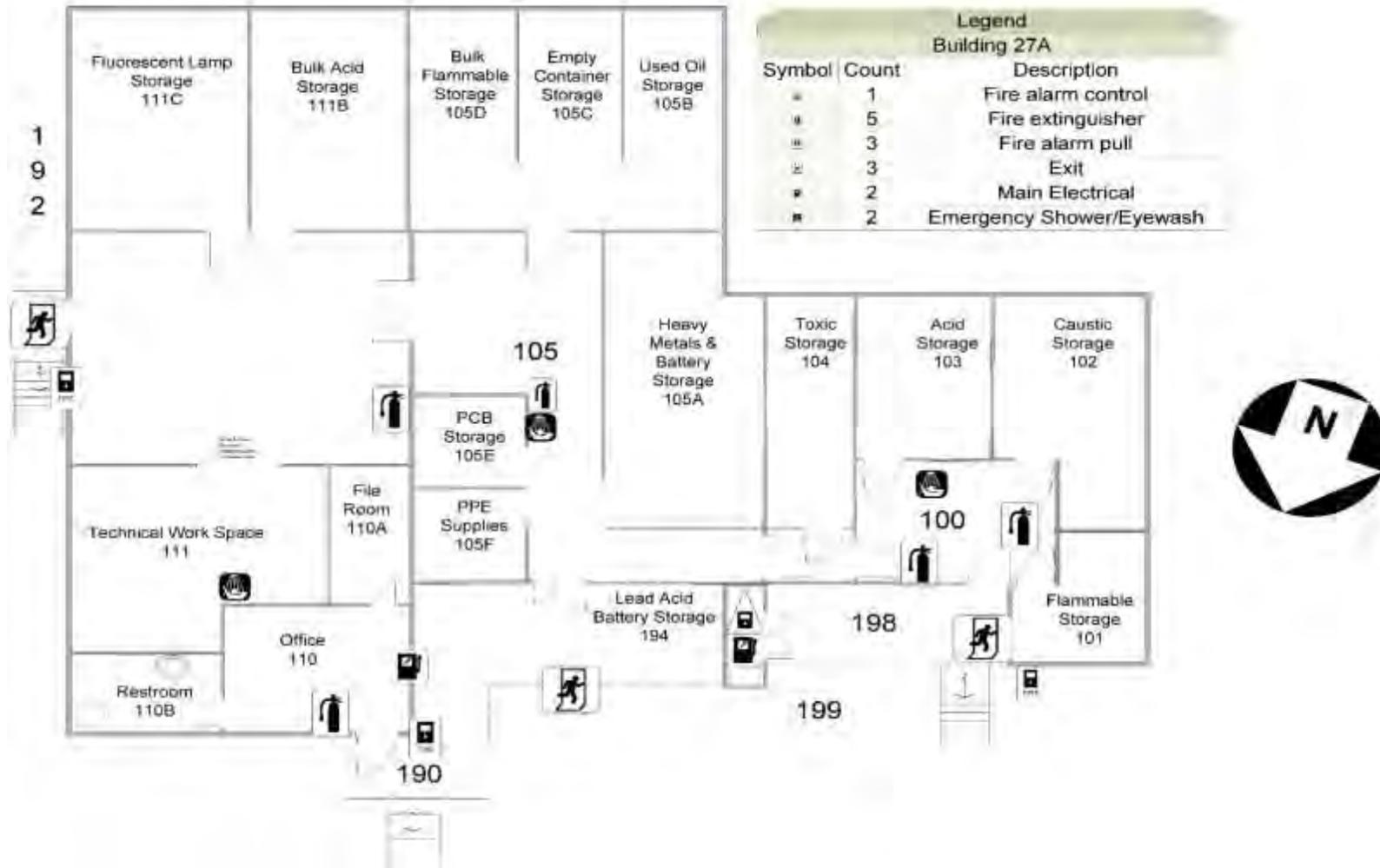
### Personal Protective Equipment (PPE) Minimal Inventory for Building 27A

The following is a description of minimum quantities of PPE required at the less-than 90-day facility (Building 27A). Minimum quantities for PPE will be documented for additional less-than 90-day facilities as needed.

| <b>Description</b>                | <b>Minimal Quantity</b> | <b>Size</b>                          |
|-----------------------------------|-------------------------|--------------------------------------|
| White Tyvek, full suit            | 12 suits                | Appropriate for employees            |
| Yellow Tyvek, full suit           | 12 suits                | Appropriate for employees            |
| Yellow Tyvek aprons w\sleeves     | 12 suits                | One size                             |
| Nitrile gloves                    | 3 boxes                 | Appropriate for employee             |
| Nitrile gloves with long sleeves  | 6 pairs                 | Appropriate for employee             |
| Respirator filters (cartridges)   | 4 pair per respirator   | Appropriate for work being conducted |
| Chemical resistant boots (covers) | 1 pair per employee     | Appropriate for employee             |
| Face shields                      | 2 per employee          | One size                             |
| Goggles                           | 2 per employee          | One size                             |
| Ear plugs                         | 6 pair per employee     | One size                             |

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### Appendix D Building 27A Facility Floor Plan



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## **Appendix E Less-Than 90-Day Facility Visitor Briefing**

### **Facility Hazards**

The less-than 90-day facility (building 27A) accumulates waste with the following characteristics:

- Flammable – Liquids and Solids
- Corrosive – Liquids and Solids
- Toxic – Liquids and Solids
- Reactive – Liquids and Solids
- Oxidizers – Liquids and Solids
- Non RCRA Regulated
- Non Hazardous but Regulated by a Permit
- Universal– PCB’s Ballasts, Fluorescent Lamps, Mercury Thermometers, etc.

The facility contains material and equipment for spill clean-up.

### **Safety Actions**

The following safety actions must be followed when visiting building 27A:

- No visitors shall be allowed in the storage areas unless accompanied by an escort from the environmental office familiar with the facility and knowledgeable of its hazards and emergency measures.
- If a visitor should come into contact with any waste or waste containers, notify the environmental escort immediately for assistance with the necessary decontamination procedures.
- Smoking is not allowed in the building or anywhere within the gates leading into the building 27A parking lot.

### **Contaminated Personnel**

Contaminated personnel familiar with the emergency eyewash and shower may use them without assistance from the environmental escort, in the event of an emergency. If you require medical attention, please notify your escort for the appropriate actions.

### **Emergency Evacuation**

In the event of an emergency, evacuate the required area in a calm and orderly fashion and report immediately to the entrance gate to the 27A compound.

**Appendix F  
GSFC Greenbelt EPA ID Numbers**

| <b>Location</b>   | <b>EPA ID Number</b> | <b>MDE Generator Status</b> | <b>US EPA Generator Status</b> |
|---|----------------------|-----------------------------|--------------------------------|
| Main Campus<br>8800 Greenbelt Road<br>Greenbelt MD 20771                                | MD9800013865         | Generator                   | Large Quantity Generator       |
| Area 200<br>Optical Research<br>GGAO Springfield Road<br>Laurel, MD 20708               | MDR000001925         | Small Quantity Generator    | Very Small Quantity Generator  |
| Area 300<br>Magnetic Test Facility 10545 Good Luck Road<br>Glenn Dale, MD 20769         | MDR000527469         | Small Quantity Generator    | Very Small Quantity Generator  |
| Area 400<br>Bi-Propellant Test Facility<br>10437 Good Luck Road<br>Glenn Dale, MD 20769 | MDR000527468         | Small Quantity Generator    | Very Small Quantity Generator  |

A map of the Greenbelt main campus and its remote areas is shown in **Figure A**. The EPA ID number for each area is shown along with local roads and location in relationship to one another.

The main campus of Greenbelt is managed as a RCRA Large Quantity Generator. Greenbelt has one less-than 90-day facility located at building 27A. The location of building 27A is indicated by the NFPA diamond marker in **Figure B**.

Area 100 does not have an EPA ID number and is on long term agreement with Beltsville Agriculture Research Center (BARC).

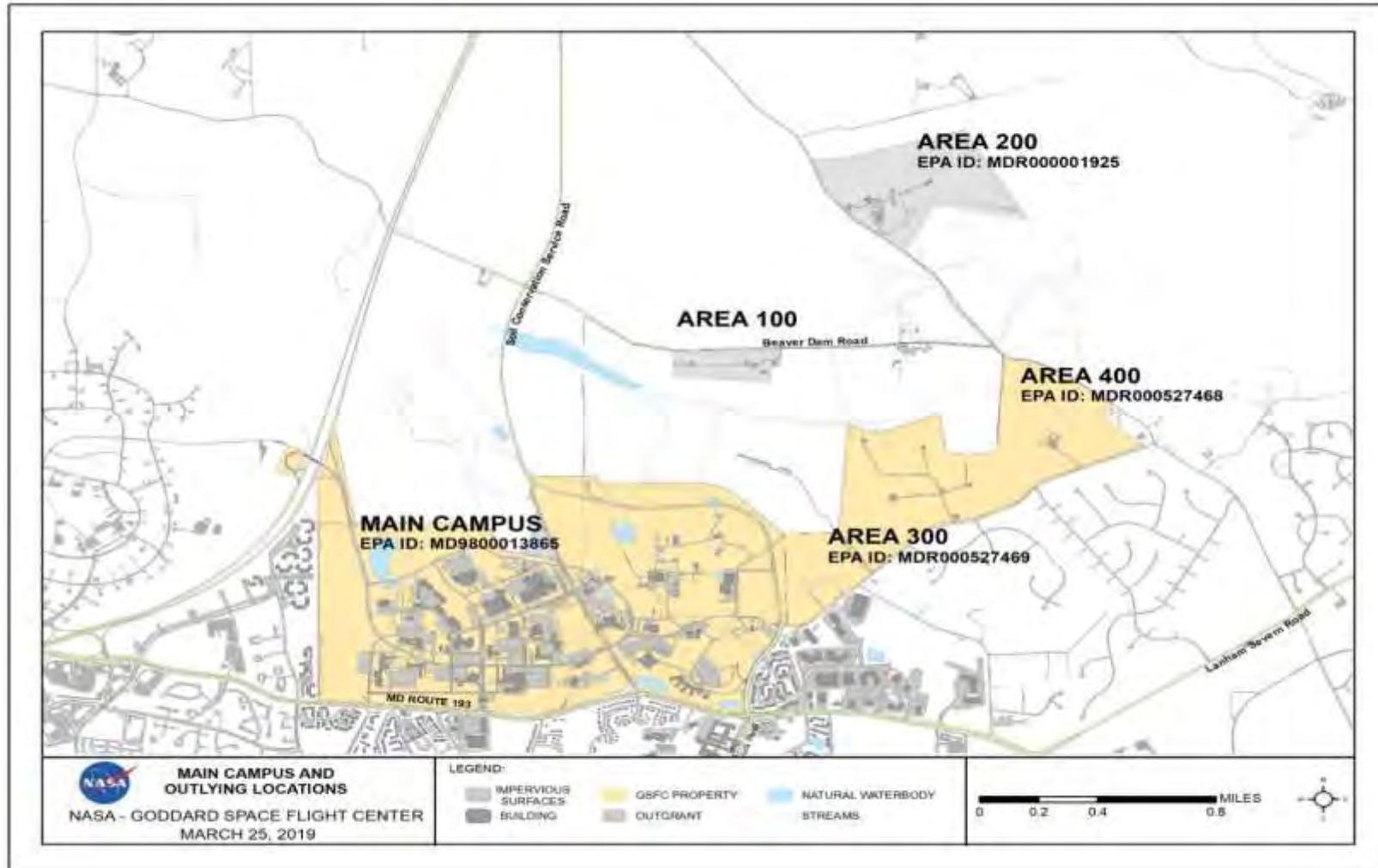
Area 200 is shown in **Figure C**. Area 200 has one central storage location for hazardous waste that is indicated by the NFPA diamond marker in **Figure C**. Waste is picked up and removed from this location every 180 days or when waste generation activities occur.

Area 300 is shown in **Figure D**. Area 300 has one central storage location for hazardous waste that is indicated by the NFPA diamond marker in **Figure D**. Waste is picked up and removed from this location every 180 days or when waste generation activities occur.

Area 400 is shown in **Figure E**. Area 400 has one central storage location for hazardous waste that is indicated by the NFPA diamond marker in **Figure E**. Waste is picked up and removed from this location every 180 days or when waste generation activities occur.

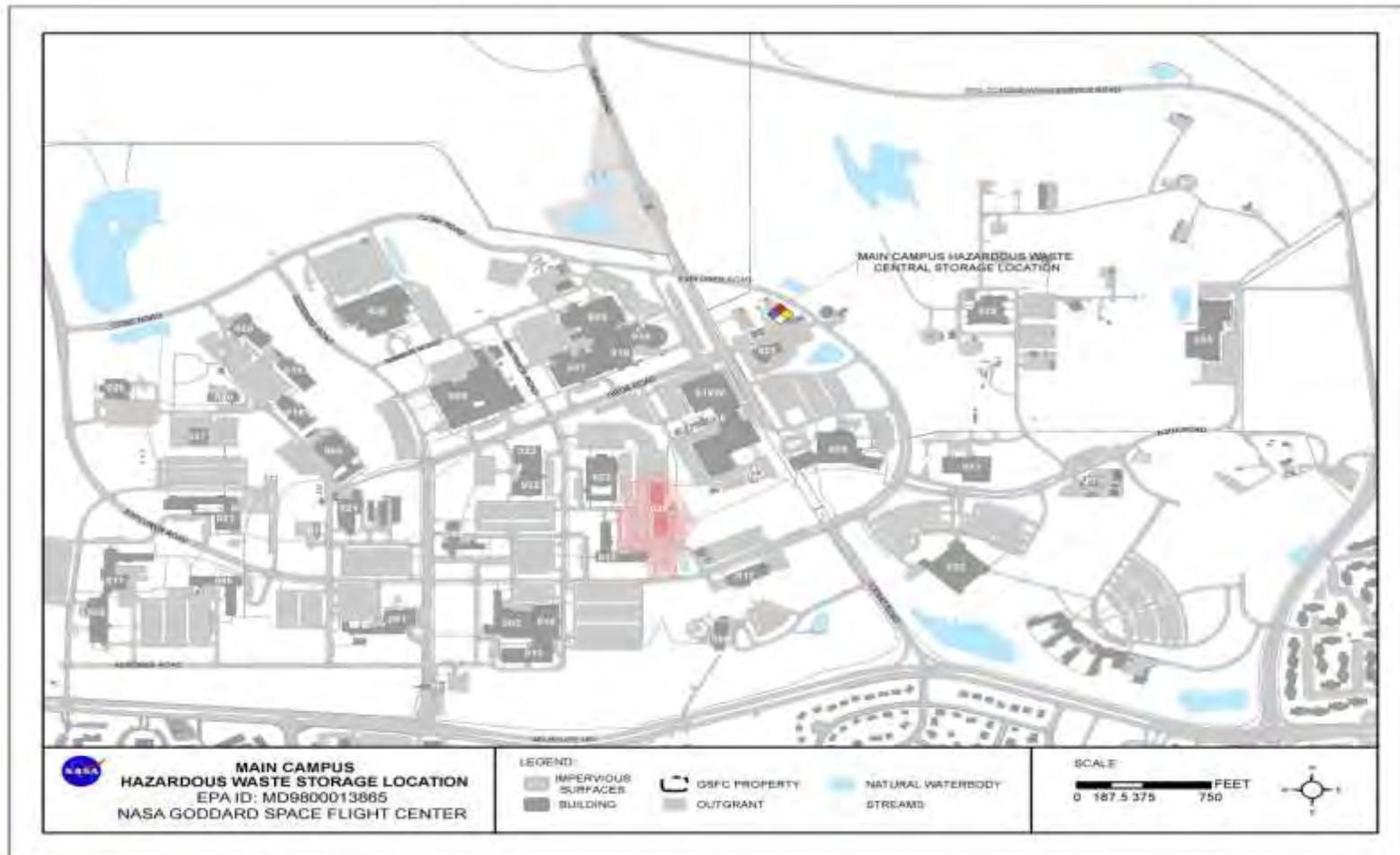
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Figure A



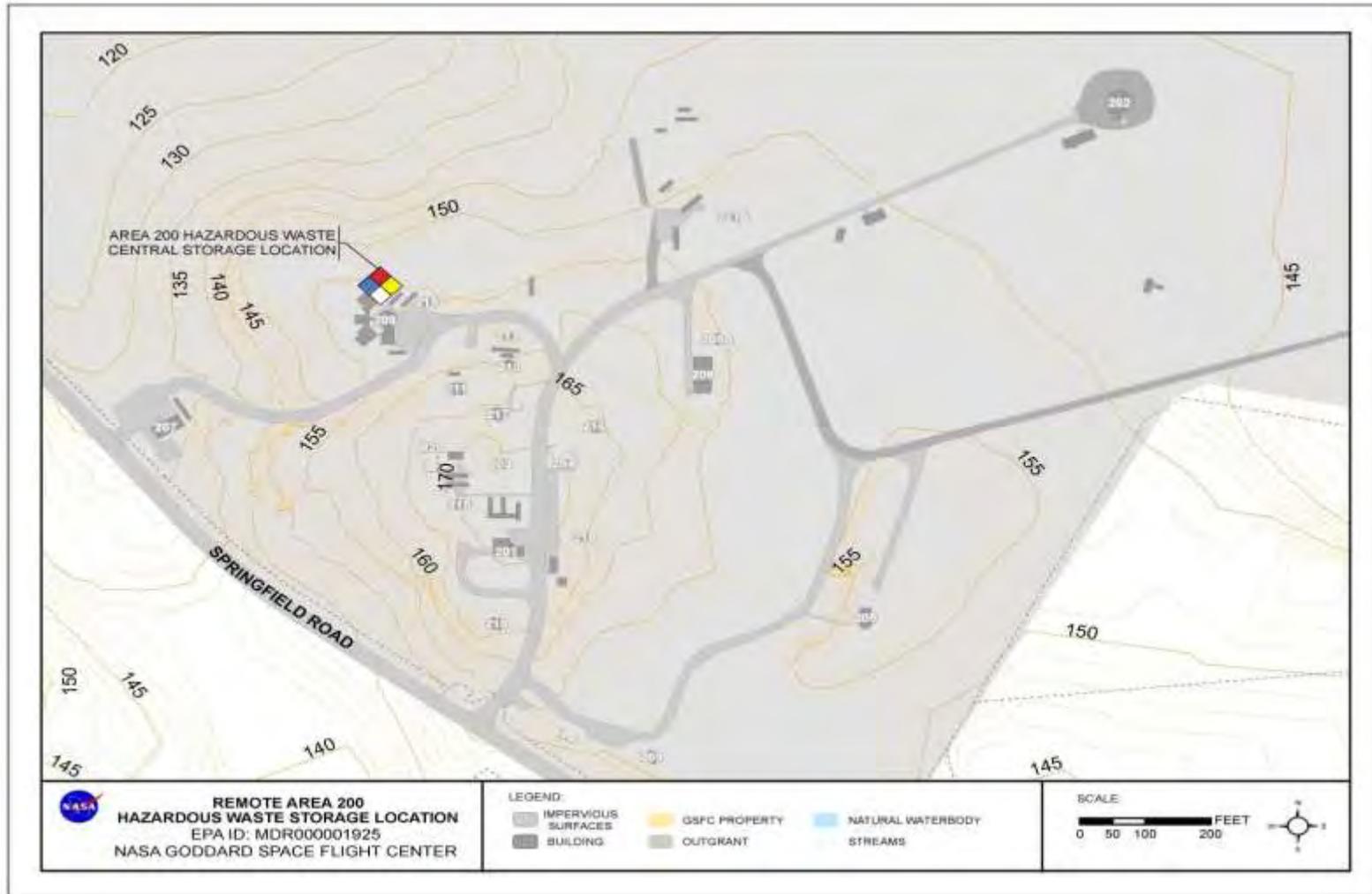
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Figure B



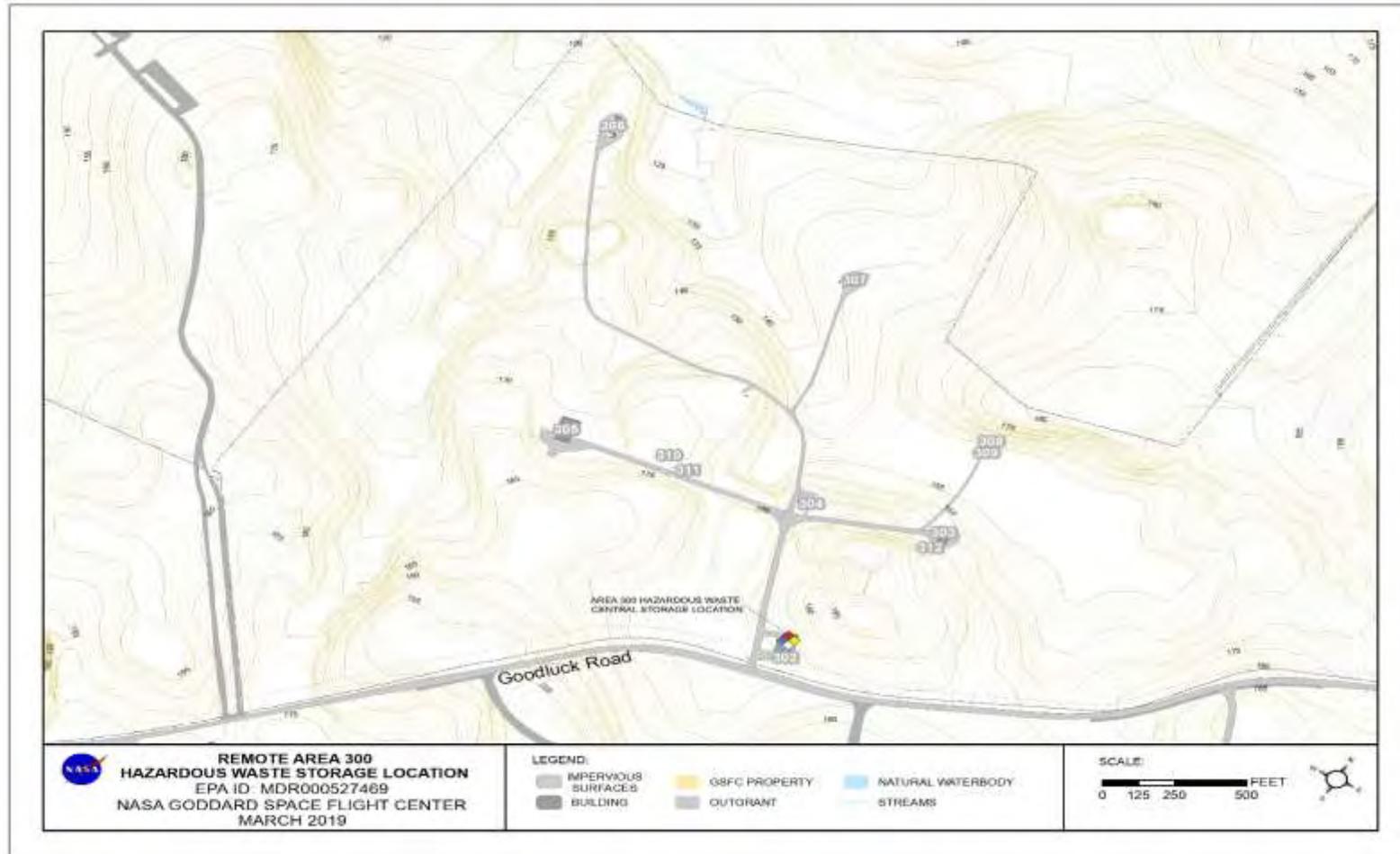
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Figure C



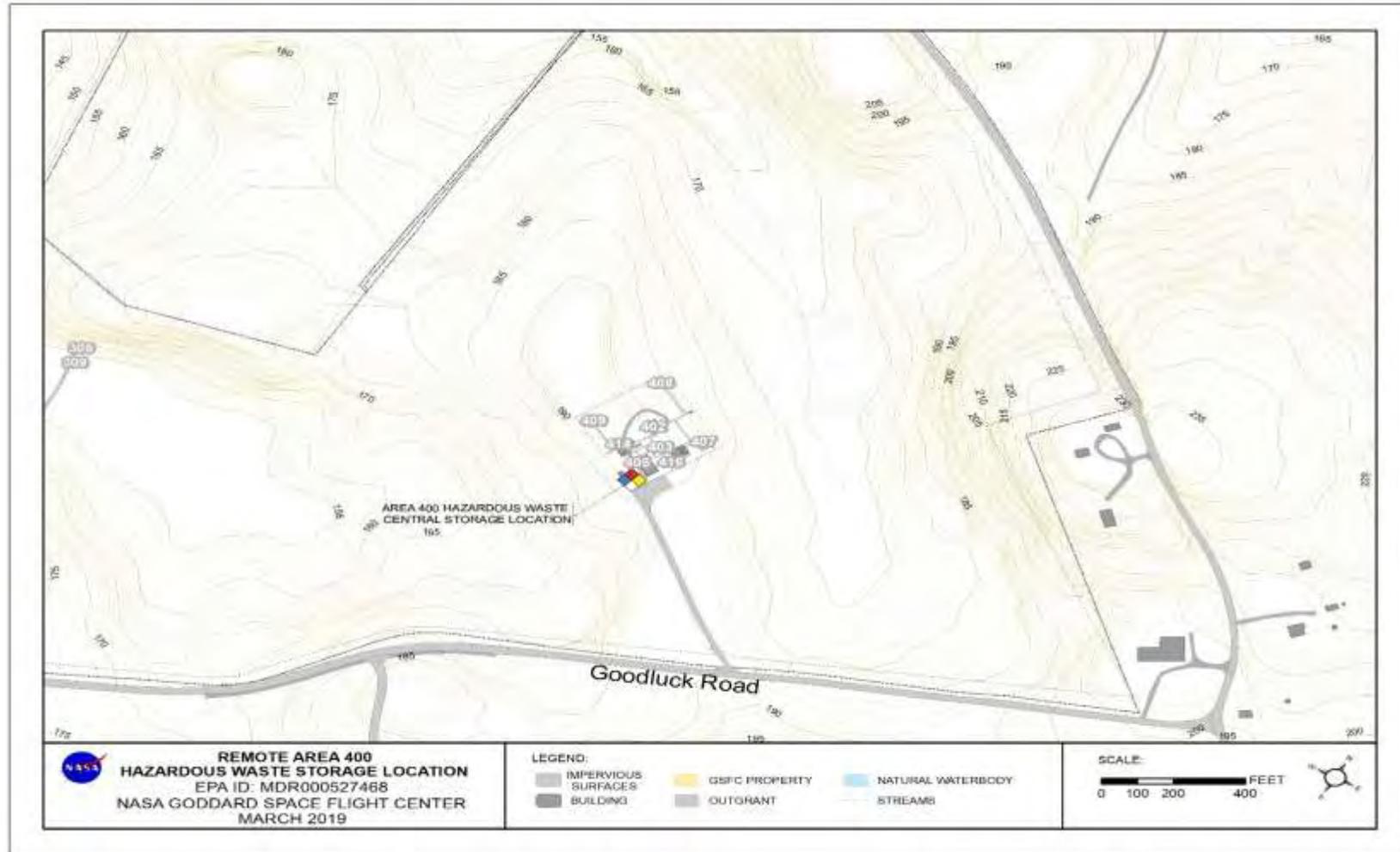
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**Figure D**



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**Figure E**



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**Appendix G  
Required Personnel Training**

|  | CS HW Manager | HW Tech * | HW SAA Generator** | Less-than 90-Day Ancillary | Less-than 90-Day Escort Visitor | Less-than 90-Day No Escort Visitor | Manifest Signer* |
|--|---------------|-----------|--------------------|----------------------------|---------------------------------|------------------------------------|------------------|
| GSFC Waste Management Training                               | x             | x         | x                  |                            |                                 |                                    | x                |
| 90-Day Facility Training                                     | x             | x         |                    | x                          |                                 |                                    |                  |
| Knowledge of HW Waste Regulations                            | x             | x         |                    |                            |                                 |                                    |                  |
| 90-Day Inspections and Storage Requirements                  | x             | x         |                    |                            |                                 |                                    |                  |
| Waste Determinations   | x             | x         |                    |                            |                                 |                                    |                  |
| Knowledge of Pre-transportation Requirements (Manifests/Lab) | x             | x         |                    |                            |                                 |                                    | x                |
| Familiar with Waste Generated                                | x             | x         |                    |                            |                                 |                                    |                  |
| Reporting and Recordkeeping                                  | x             | x         |                    |                            |                                 |                                    |                  |
| Waste Minimization   | x             | x         |                    |                            |                                 |                                    |                  |
| Waste Packaging  | x             | x         |                    |                            |                                 |                                    |                  |
| ICP Training   | x             | x         |                    | x                          |                                 |                                    |                  |
| DOT  | x             | x         |                    |                            |                                 |                                    | x                |
| Visitor Briefing   |               |           |                    |                            | x                               |                                    |                  |
| Visitor Briefing (documented)                                |               |           |                    |                            |                                 | x                                  |                  |
| HAZWOPER   |               | x         |                    |                            |                                 |                                    |                  |
| * Some training has re-occurring requirements                |               |           |                    |                            |                                 |                                    |                  |

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| Hazardous Waste Required Personnel Descriptions |  |
|---|--|
| CS HW Manager                                   | Responsible for overall HW management functions at the less-than 90-day facility (does not handle HW).   |
| HW Tech   | Responsible for HW management functions; performs physical waste activities (moving and labeling containers, collecting samples).                  |
| HW SAA Generator                                | Generates hazardous waste as part of the production process; may utilize satellite containers.   |
| Less-than 90-day Facility Ancillary Personnel   | Generates no HW and has no direct contact physical contact with HW activities.   |
| Less-than 90-day No Escort Visitor              | Generates no HW and has no direct contact physical contact with HW activities.   |
| Less-than 90-day Facility Visitor               | Generates no HW and has no direct contact physical contact with HW activities.   |
| Manifest Signer                                 | Responsible for signing Uniform Hazardous Waste Manifest. Ensures accurate and complete shipments of hazardous waste are sent to an approved TSDF. |
| Temporary Less-than 90-day Facility HW Tech     | Specific responsibilities to be determined and documented based on individual less-than 90-day facility operations.                                |

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**Appendix H**

**PART A – Compliance Review and TSDf Approval**

**Facility Name:** \_\_\_\_\_ **Date:** \_\_\_\_\_  
**Facility Address:** \_\_\_\_\_  
**Facility POC:** \_\_\_\_\_  
**Facility Phone:** \_\_\_\_\_  
**USEPA ID #:** \_\_\_\_\_  
**State ID #:** \_\_\_\_\_

| RCRA Permit #:  | Expiration Date: |               |                 |
|---|------------------|---------------|-----------------|
|   | Permit Type      | Permit Number | Expiration Date |
| <b>Summary of Other Permitted Operations:</b><br>Include type of wastes managed.      |                  |               |                 |
| <b>GSFC Wastes Received:</b><br>Include Profile Number.<br>Continue in Notes Section. |                  |               |                 |
| <b>Recent GSFC Manifests to Site:</b><br>Describe Manifest Filing System:             |                  |               |                 |
| <b>Date of Last USEPA or State Inspection:</b>  |                  |               |                 |

**Summary**

**Audit Completed by:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Attachments** Echo Report  Facility Audit Book  State/Fed RCRA Inspection  Other

**Conclusion** No significant Risk to GSFC  Potential Risk to GSFC (see Summary)  Significant Risk to GSFC

**Waste Program Manager Review**

**Recommendation** APPROVE No Significant GSFC Risk  FURTHER EVALUATION REQUIRED Potential Risk to GSFC  DISAPPROVE Significant Risk to GSFC

**Comments:**

**Name** \_\_\_\_\_ **Signature** \_\_\_\_\_ **Date** \_\_\_\_\_

**Chief, Medical and Environmental Management Division**

**TSDf APPROVED TO RECEIVE GSFC WASTE**  **CONDUCT SITE VISIT AND RESUBMIT**  **TSDf NOT APPROVED TO RECEIVE GSFC WASTE**

**Comments:**

**Name** \_\_\_\_\_ **Signature** \_\_\_\_\_ **Date** \_\_\_\_\_

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**PART B – Site Visit Inspection**

|                       |  |                    |  |
|-----------------------|--|--------------------|--|
| <b>Facility Name:</b> |  | <b>Audit Date:</b> |  |
|-----------------------|--|--------------------|--|

**1.0 Does the Facility have** (check the appropriate block, comments in Notes Section): **Yes No Not Observed**

|  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| a. A Waste Analysis Plan (WAP)? 265.13   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Does the WAP include:  |                          |                          |                          |
| (1) Parameters for which each waste will be analyzed?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (2) Test methods for each parameter?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (3) Method to obtain sample?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (4) Procedures to determine when to resample?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (5) Which Off-Site analysis that will be accepted?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (6) Inspection procedures for wastes received?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Adequate security through either: 265.14  |                          |                          |                          |
| (1) 24 hour surveillance (guards, camera, etc.)?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (2) Artificial or natural barriers and entrance controls?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. An internal communication or alarm system? 265.34   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Telephone or two-way radio to call emergency response personnel? 265.32(b)  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? 265.32(c)  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f. Water of adequate volume for hoses, sprinklers, or water spray system? 265.32(d)  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Describe the water source:   |                          |                          |                          |
| g. Sufficient aisle space to allow unobstructed movement of personnel and equipment? 265.35  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| h. Arrangements with the local authorities to familiarize them with characteristics of the facility? 265.37  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| i. Phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers? 265.37(a)(3)  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| j. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? 265.37(a)(4) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| k. A current Contingency Plan to cover all operations? 265.51,53   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| l. Does contingency plan include:  |                          |                          |                          |
| (1) Arrangements with local emergency response organizations? 265.52(c)  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|  |                          |                          |                          |

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| <b>1.0 Does the Facility have: (cont.)</b> (check appropriate block, comments in Notes Section)             | <b>Yes</b>               | <b>No</b>                | <b>Not Observed</b>      |
|---|--------------------------|--------------------------|--------------------------|
| (2) Emergency coordinators names, phone numbers, and addresses? 265.52(d)                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (3) A list of all emergency equipment at facility and descriptions of equipment? 264/5.52(e)                | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (4) Evacuation plan for facility personnel? 265.52(f)   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| m. An emergency coordinator on-call at all times? 265.55  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| n. Copies of all manifests? 265.71(a)   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| o. Are the manifests signed and dated and returned to the generator? 265.71(a)                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| p. Thorough operating records? 265.73   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| q. Do these records include: 265.73(b)  |                          |                          |                          |
| (1) Description and quantity of each waste received?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (2) Methods and dates of treatment, storage, and disposal?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (3) Location and quantity of each waste at each location?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (4) Cross-references to manifests/shipping papers?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (5) Records and results of waste analyses?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (6) Report of incidents involving implementation of the contingency plan?                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (7) Records and results of required inspections?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (8) Monitoring or testing analytical data?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (9) Notices of generators as specified?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (10) Certification of permittee waste minimization program?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (11) Land disposal restriction records required by 40 CFR 268.5, 268.6, 268.7(a), and 268.8, as applicable? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| r. A Ground Water Monitoring Plan? 265.90   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| s. Ground water monitoring records? 265.94  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| t. A Closure Plan? 265.112  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| u. A Post-Closure Monitoring Plan? 265.118  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| v. LDR notification and certification? 268.7  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| w. Characteristic waste notification? 268.9   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| x. Does the facility submit a biennial report by March 1 every even numbered year? 265.75                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| y. Does the report contain the following:   |                          |                          |                          |
| (1) EPA I.D. number? 265.75(a)  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (2) Date and year covered by report? 265.75(b)  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (3) Description/quantity of hazardous waste? 264/5.75(d)  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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| <b>1.0 Does the Facility have: (cont.)</b> (check appropriate block, comments in Notes Section)   | <b>Yes</b>               | <b>No</b>                | <b>Not Observed</b>      |
|---|--------------------------|--------------------------|--------------------------|
| (4) Treatment, storage, and disposal methods? 265.75(e)   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (5) Monitoring data under §265.94(a)(2) and (b)(2)? 265.75(f)   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (6) Recent closure and post-closure cost estimates? 265.75(g)   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (7) For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year? 265.75(h) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (8) Certification signed by owner/operator? 265.75(j)   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**2.0 Waste Management Process**

|                                      |  |
|--------------------------------------|--|
| <b>Process Description:</b>          |  |
| <b>Process Drawing/ Flow Diagram</b> |  |

| <b>3.0 Process Walkthrough.</b> (Explain negative responses in Notes Section.)                                     | <b>Yes</b>               | <b>No</b>                | <b>Not Observed</b>      |
|--|--------------------------|--------------------------|--------------------------|
| a. Are materials properly stored (compatible, segregated)?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Are containers properly labeled?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Are containers closed when holding hazardous waste?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Evidence of spills, leaks, etc.   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f. Does area have proper signage?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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**4.0 Health and Safety** (Explain negative responses in Notes Section.)

**Yes No Not Observed**

|   | Yes                      | No                       | Not Observed             |
|---|--------------------------|--------------------------|--------------------------|
| a. Is there a training program to prepare personnel to operate or maintain the facility in a safe manner? 265.16(a)(1)  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Does the outline describe how the training will be designed to meet actual job tasks? 265.16(a)(1)   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Is the training program periodically reviewed to ensure currency and applicability?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Are there personnel and training records containing: 265.16  |                          |                          |                          |
| (1) Job title and job description for each person?  | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| (2) Description of type and amount of training?   | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| e. Does the training program combine classroom instruction and on-the-job training? 265.16(c) and (d)(3)  | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| f. Is an annual refresher course required for personnel whose positions at the facility are related to hazardous waste management? 265.16(c) and (d)(3)             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g. Is the training program directed by a person trained in hazardous waste management? 265.16(a)(2)   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| h. Are facility personnel instructed in hazardous waste management procedures (including contingency plan implementation) relevant to their positions? 265.16(a)(2) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| i. Does the training program include the following emergency response procedures? 265.16(a)(3)  |                          |                          |                          |
| (1) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment?   | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| (2) Key parameters for automatic waste feed cut-off systems?  | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| (3) Procedures for utilizing communications or alarm systems?   | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| (4) Directions for responding to fires or explosions?   | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| (5) Procedures for groundwater contamination response?  | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| (6) Procedures for conducting shutdown operations?  | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| j. Are all facility personnel trained within six months of their employment or assignment to the facility or transfer to a new position? 265.16(b),(d)(4) and (3)   | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| k. Does the owner/operator test and maintain the following equipment:   |                          |                          |                          |
| (1) All communications or alarm systems?  | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| (2) Fire protection equipment?  | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| (3) Spill control equipment?  | <input type="checkbox"/> | <input type="checkbox"/> |                          |

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| <b>4.0 Health and Safety (cont.)</b> (Explain negative responses in Notes Section.)                                | <b>Yes</b>               | <b>No</b>                | <b>Not Observed</b> |
|--|--------------------------|--------------------------|---------------------|
| (4) Decontamination equipment?   | <input type="checkbox"/> | <input type="checkbox"/> |                     |
| l. A written inspection schedule covering: 265.15  |                          |                          |                     |
| (1) Monitoring equipment?  | <input type="checkbox"/> | <input type="checkbox"/> |                     |
| (2) Safety and emergency equipment?  | <input type="checkbox"/> | <input type="checkbox"/> |                     |
| (3) Security devices?  | <input type="checkbox"/> | <input type="checkbox"/> |                     |
| (4) Operational equipment, including storage areas?  | <input type="checkbox"/> | <input type="checkbox"/> |                     |
| m. Is an inspection log maintained containing (check last six months):   |                          |                          |                     |
| (1) Date and time of inspection?   | <input type="checkbox"/> | <input type="checkbox"/> |                     |
| (2) Inspector's name?  | <input type="checkbox"/> | <input type="checkbox"/> |                     |
| (3) Notes identifying observations?  | <input type="checkbox"/> | <input type="checkbox"/> |                     |
| (4) Are inspections conducted at least weekly?   | <input type="checkbox"/> | <input type="checkbox"/> |                     |
| <b>5.0 Environmental Justice</b> (Explain responses in Notes Section.)   |                          |                          |                     |
| a. Are there any minority / disadvantaged communities adjacent to the facility?                                    | <input type="checkbox"/> | <input type="checkbox"/> |                     |
| b. Has the facility considered its impacts on that community?  | <input type="checkbox"/> | <input type="checkbox"/> |                     |
| <b>6.0 Process Photos</b><br>(Include detailed description of each photo.)<br>Insert additional rows as necessary. |                          |                          |                     |
|  |                          |                          |                     |
|  |                          |                          |                     |

**Notes**

**Ques. # Note**

|  |  |
|--|--|
|  |  |
|  |  |

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### CHANGE HISTORY LOG

| Revision | Effective Date | Description of Changes   |
|----------|----------------|--|
| Baseline | 2/16/06        | Initial Release  |
|          | 2/15/2011      | Administrative Change of Safety and Environmental Division to Medical and Environmental Management Division throughout.<br>Document expiration date of 2/16/11 extended 3 months for document revision.  |
| A        | 5/2/11         | <ul style="list-style-type: none"> <li>• Modified template to reflect new 2009 template.</li> <li>• Made changes to reflect Medical and Environmental Management Division (MEMD) name change from Safety and Environmental (S&amp;E)</li> <li>• P.8 MSDS deleted from list of records.</li> <li>• Changes made to reflect new hazardous waste database from Wintrak G database</li> <li>• 2.a Modified Container Management to reflect appropriate work schedule guidelines</li> <li>• 2.c Changes made to reflect use of eMOD in waste pickups</li> <li>• 2.1 Changes made to reflect SWPPP Inspections taking place during 90 Day weekly inspections</li> <li>• Appendix C – Personal Protective Equipment Inventory- made changes to reflect use of nitrile gloves</li> <li>• Appendix E – Facility Hazards- made changes to reflect location of spill equipment materials throughout 27A complex</li> </ul>  |
| B        | 4/18/16        | <ul style="list-style-type: none"> <li>• Updated document name to better reflect contents.</li> <li>• Language in the PG was changed to be inclusive of any other less than 90-day facilities that may occur at GSFC, other than the MEMD managed facility in building 27A</li> <li>• 2.3.4. Updated language to address the assigning of accumulation start dates for all universal waste containers, at the time they are delivered.</li> <li>• 4.1. A key or code can be used to gain access to the main gates.</li> <li>• Appendix B – LDR was removed from the list of acronyms. LDRs are not mentioned in this document.</li> <li>• Appendix D – Room numbers were updated in the building 27A Facility Floor Plan</li> <li>• Added Appendix F – Valid GSFC EPA ID Numbers and map documents added to show an overview of how GSFC manages each site, including figures to show geographical locations of GSFC EPA ID numbers</li> <li>• Added Appendix G –Further clarified personnel job descriptions and required training</li> <li>• Formatted the document per GPR1410.1 Directives Management</li> </ul> |

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|   |            |   |
|---|------------|---|
| C | 04/11/18   | <ul style="list-style-type: none"> <li>• Globally changed eMOD to MOSI.</li> <li>• Update to new template</li> <li>• Incorporated requirements for TSDF audits into Section 3.2 TSDF audits</li> <li>• Added Appendix H TSDF Checklist</li> <li>• Added Section 1.3 Operational procedures to clarify electrically classified areas and requirements</li> <li>• Added Section 3.3 Manifest</li> <li>• Changed WAP reference number to 250-WAP-2017</li> <li>• Removed “Waste Profiles”, “Waste Manifests” and “27A Employee Training Records” from section P.8</li> <li>• Globally corrected grammar and punctuation errors</li> <li>• Globally change “Less” for “less”</li> <li>• Deleted first paragraph of section P.8</li> <li>• Section P.9 changed “This” to “These” and “is” to “are”</li> <li>• Section P.9.1 changed “waste shipped” to “weight shipped”</li> <li>• Section 1.2.3 deleted last sentence</li> <li>• Section 1.3.1 added “a” before 3-foot radius</li> <li>• Section 2.2.1 changed reference to section 2.1 to 2.1.1</li> <li>• Section 2.2.2 added “located in file folder”</li> <li>• Section 2.3.1 changed “Operations” to “Information”</li> <li>• Section 2.3.2 reworded last sentence</li> <li>• Section 2.3.3 deleted first sentence and reworded last sentence</li> <li>• Section 2.3.4 changed “arrival” to “receipt of waste”; “waste” to “information”. Added “For universal waste”</li> <li>• Section 2.11 changed in last sentence “the 90 Day Facility” to “hazardous waste storage areas at Greenbelt”</li> <li>• Section 3.2.4 added “file folder” at the end</li> <li>• A.1 spelled out HMMS</li> <li>• Appendix B added “ECHO”, “NRRS” and “PG”</li> <li>• Appendix E added “Non Hazardous but Regulated by a Permit”. Deleted last sentence under Facility Hazards</li> <li>• Appendix F added “Greenbelt” where applicable</li> </ul> |
| D | 10/18/2019 | <ul style="list-style-type: none"> <li>• Removed “Waste Accumulation” from PG name throughout.</li> <li>• Removed excess “shall” statements throughout.</li> <li>• 2.4.2 added in accordance with the 250-WI-8500.3.2. Removed bullets “a.” through “d.”</li> <li>• 3.3 Section title changed to Waste Disposal Documents.</li> <li>• 3.3.1 Section expanded to include additional waste document types.</li> <li>• 3.3.2 Hazardous waste manifest specified.</li> <li>• Figure A changed map to reflect new Area 300 and 400 separate EPA IDs</li> <li>• Appendix B- Acronyms added EPA, MDE, and WAP.</li> </ul>  |

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**DIRECTIVE NO.** 250-PG-8500.3.3D  
**EFFECTIVE DATE:** 10/18/2019  
**EXPIRATION DATE:** 10/18/2024

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|--|--|---|
|  |  | <ul style="list-style-type: none"><li>• Appendix D- updated map to reflect current operations</li><li>• Appendix F- updated to reflect separate EPA ID numbers for Area 300 and 400. Also updated the address for Area 200.</li></ul> |
|--|--|---|

For Best Practices refer to:

<https://gs279gdmsias.gsfc.nasa.gov/GDMSv2/downloadFile.htm?docId=28819>

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