



## Work Instruction (WI)

**DIRECTIVE NO.** 250-WI-8500.1.5D  
**EFFECTIVE DATE:** 06/28/2019  
**EXPIRATION DATE:** 06/28/2024

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

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### COMPLIANCE IS MANDATORY

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**Responsible Office:** 250/ Medical and Environmental Management Division

**Title:** Environmental Regulatory Review and Assessment

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## PREFACE

### P.1 PURPOSE

The purpose of this Work Instruction is to set guidelines for conducting environmental regulatory review assessments at NASA Goddard Space Flight Center (GSFC).

### P.2 APPLICABILITY

- a. This Work Instruction applies to Medical and Environmental Management Division (MEMD) Environmental Team civil servants and their authorized contractors at Greenbelt only.
- b. In this document, all document citations are assumed to be the latest version unless otherwise noted.
- c. 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 APPLICABLE DOCUMENTS AND FORMS

- a. FedCenter Daily Newsletter.
- b. Federal Registrar website, <https://www.federalregister.gov/documents/current>
- c. NASA Regulatory Risk Analysis and Communication (RRAC).

### P.4 CANCELLATION

250-WI-8500.1.5C

### P.5 TOOLS, EQUIPMENT, AND MATERIALS

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- a. Environmental Management System (EMS) SharePoint Access.
- b. Valid e-mail address on the NASA's Operational Messaging and Directory Services (NOMAD) system.

**P.6 SAFETY PRECAUTIONS AND WARNINGS**

None

**P.7 TRAINING**

None

**P.8 RECORDS**

<b>Record Title</b>	<b>Record Custodian</b>	<b>Retention</b>
Environmental Regulatory Review and Assessment Monthly Reports	MEMD	23.5.A2 Cut off annually. Destroy 3 years after cutoff.

\* *NRRS 1441.1 – NASA Records Retention Schedule*

**P.9 MEASUREMENT/VERIFICATION**

None

## Instructions

### 1.0 PROCEDURES

Regulatory updates are received via email from the Biweekly RRAC Regulatory Summary and via other professional publications and notices. Information on new and/or updated federal regulations can be found on the Federal Register website.

1. MEMD civil servants and contractors shall subscribe to the RRAC to receive the Federal Regulatory Summary Alert and the Biweekly Legislative and Regulatory Summary Alert via email. The following steps will be taken to subscribe to this service:
  - a. Visit <https://lists.nasa.gov/mailman/listinfo/rrac>.
  - b. Provide your NOMAD email address and proceed to set up an account.
2. The MEMD contractor Program Manager (PM) or his/her designee shall (for alerts and final notices only):
  - a. Determine if there is information contained in the alert(s) or final notice that requires immediate action.
  - b. Inform the Contracting Officer's Representative (COR) and Civil Servant Program Manager (CSPM) if immediate action to an alert or a final regulation is required.
  - c. Notify the Center EMS Representative of legal and regulatory changes applicable to the EMS.
  - d. Perform an analysis of impacts and actions to MEMD or any organization within GSFC. Impacts may include the need to take immediate action; and/or increased costs and/or workload. The results of the analysis may be incorporated into the monthly report or may generate a standalone document to be used for further cost analysis and workload impacts. Once complete, this document will be reviewed by the contractor PM, CSPM, and COR.
  - e. Upon receipt of the weekly or biweekly alerts, post them to the EMS Share Point directory at <https://itcdsp13.gsfc.nasa.gov/sites/ems/Regulatory%20Review/Forms/AllItems.aspx>.
  - f. Documents will be uploaded by clicking "New Document" and then "Browse" to locate the file to be uploaded.
  - g. The year/month will be in the format of "YY\_MM."
3. Monthly, the MEMD contractor PM or his/her designee shall do the following:
  - a. If the alert or final notice does not require immediate action, then the PM will assess the alert to determine what, if any, mid- to long-range affect the alert will have on GSFC operations at Greenbelt. The assessment will be entered into the Monthly Regulatory Review and Assessment Report.
  - b. The Monthly Regulatory Review and Assessment Report will be maintained on the EMS SharePoint site and will be accessible to all MEMD personnel for viewing. Directions for posting the Report are the same as expressed in Item 2 above.

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- c. Alerts shall appear on the Monthly Regulatory Review and Assessment Report until all actions are closed (i.e., the regulation is in effect or the proposed regulation has been withdrawn). Once a regulation takes effect or is withdrawn, the alert will be shown as closed on the current report and then taken off of the next report. If a regulation is in effect, but GSFC is not in compliance with the regulation, the alert will be put into the Safety, Health, and Environmental Tracking system (SHEtrak).
4. The Monthly Regulatory Review and Assessment Report shall be in Microsoft Excel format and contain the following information:
  - a. The environmental media/program (e.g., Air, Water, Resource Conservation and Recovery Act/Toxic Substance Control Act, Environmental Management) that the alert affects.
  - b. The applicable high-priority aspect in EMS.
  - c. A detailed summary of the proposal or rule.
  - d. An explanation of the relevance of the proposal or rule to GSFC.
  - e. The recommended action needed by GSFC to meet the requirements of the proposal or rule.
  - f. The responsible person/organization that needs to take action.
  - g. The next action due date.
  - h. MEMD comments (if any).
  - i. The status of the proposal or rule and any actions taken to meet the requirement. Also, in this column the contractor PM will put the date the alert was initially reviewed.
  - j. When the update goes into effect.
  - k. The Code of Federal Regulations (CFR), Federal Register, Code of Maryland Regulations (COMAR), Executive Orders (EOs) or House Bill reference that the proposal or rule falls under.
  - l. The date (month/year) the review was closed. (The item will appear for one month past closed date.)

*NOTE: Each Item requires a "next action due date" or a "closed date."*)

5. A list of Legal and Other Requirements (LOR) applicable to the Center's environmental aspects is maintained in the EMS SharePoint database at <https://itcdsp13.gsfc.nasa.gov/sites/ems/Lists/LOR/AllItems.aspx>. The MEMD contractor PM or his/her designee shall:
  - a. Update the LOR list to capture changes to the Center's environmental aspects list. If a legal or other requirement applies to more than one high-priority aspect, select all of the aspects that apply. The LOR list in SharePoint should never be deleted in its entirety, because links have already been established between the aspects list and LOR. Any changes must be entered individually by clicking on the "Edit" icon to the far left of each citation or by clicking on "Edit in Datasheet" to edit the list in Microsoft Excel mode. The LOR list contains:
    1. Regulatory citation (e.g., CFR, EOs, United States Code, etc.).
    2. Applicable high-priority aspect(s), if any, by its alphanumeric designation (e.g., A01, A02, etc.).
    3. Type of requirement (e.g., federal, state, permit, NASA, etc.).
    4. Regulatory citation title.

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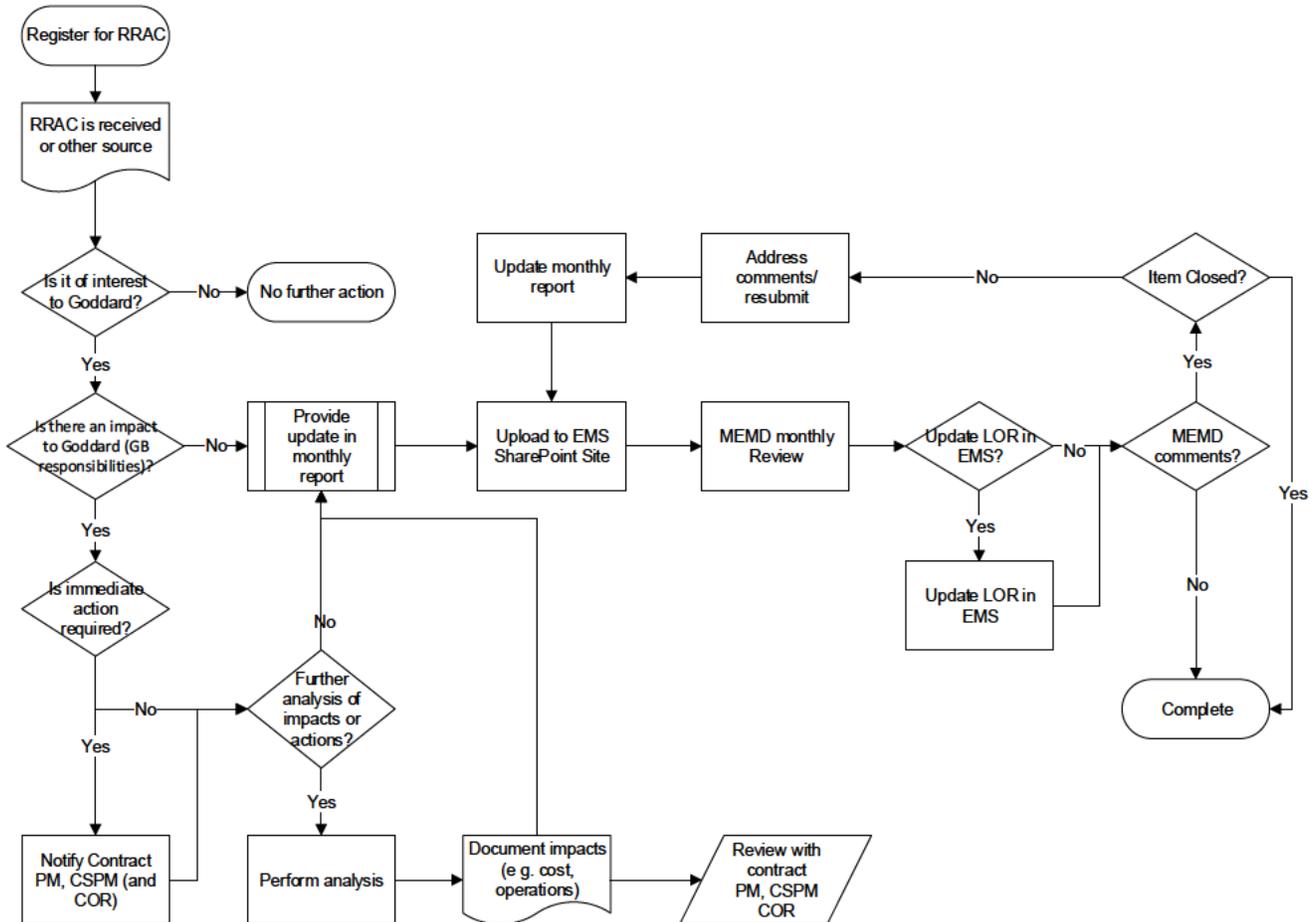
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5. A brief description of the LOR.
  6. A hyperlink to the actual citation either on the internal Goddard Directives Management System, NASA Online Directives Information System, external regulatory websites, such as e-CFR (<http://www.ecfr.gov>) or a SharePoint Document Library.
- b. Archive obsolete versions of the list of legal and other requirements in the SharePoint Archive Document Library (<https://itcdsp13.gsfc.nasa.gov/sites/ems/Archive/Forms/AllItems.aspx>) on an annual basis after the annual environmental aspects review is conducted and before the LOR is updated to reflect changes. To archive a list, the following steps will be followed:
1. In the “Library: tab, export the list by using the “Export to Excel” function.
  2. Convert the file to a Microsoft Excel file.
  3. Upload the file to the Archive Document Library.
  4. Designate the archived list as a “record” under “Doc Type” in the SharePoint library.
  5. Name the document “Legal and Other Requirements.”
  6. Enter the year the document was active (e.g., 2010-2011).
  7. Enter the date archived in “MM-DD-YYYY” format.

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## Flow Diagram



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## **Appendix A – Definitions**

A.1 Federal Regulatory Summary Alert: Contains summaries of Federal Register notices and other information. Content is screened to include environmental and health/safety items judged relevant to NASA or of broad general relevance.

A.2 FedCenter Daily Newsletter: Daily newsletter, whose sole focus is to assist federal facilities in meeting their environmental stewardship and compliance needs. FedCenter major program areas include Executive Orders 13514 and 13423, Environmental Compliance, Acquisition, Cleanup, Environmental Management System, Energy, Greenhouse Gases, High Performance Buildings, the National Environmental Policy Act, Electronics Stewardship, Pollution Prevention, Chemical Management, Sustainability, Transportation, Climate Change Adaptation, Water Efficiency, and Natural Resources. The Newsletter also provides compliance assistance information, collaboration tools, and support services.

A.3 Impacts: Any change (immediate or sustained) to workload and cost within MEMD and/or other organizations within GSFC.

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## Appendix B – Acronyms

CFR	Code of Federal Regulations
COMAR	Code of Maryland Regulations
COR	Contracting Officer’s Representative
CSPM	Civil Servant Program Manager
EMS	Environmental Management System
EO	Executive Order
GSFC	Goddard Space Flight Center
LOR	Legal and Other Requirements
MEMD	Medical and Environmental Management Division
NOMAD	NASA’s Operational Messaging and Directory Services
PM	Program Manager
RRAC	NASA Regulatory Risk Analysis and Communication
SHetrak	Safety, Health, and Environmental Tracking system

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**CHANGE HISTORY LOG**

<b>Revision</b>	<b>Effective Date</b>	<b>Description of Changes</b>
Baseline	2/1/2007	Initial Release
A	1/20/2010	Changed Safety and Environmental Division (S&E) references to Medical and Environmental Management Division (MEMD). Updated SharePoint hyperlinks.
B	3/13/2012	Moved document to current work instruction template. P.5. Changed GSFC NASA email to NOMAD directory 1.1 – Changed reference from Navy regulatory updates to reflect our new provider NASA RRAC. 1.2 – Updated SharePoint hyperlinks 1.3 – Made changes to reflect de-scoped Task Order 14 Appendix A – Added FedCenter Daily News letter and deleted Navy newsletter reference.
C	03/03/2017	Updated SharePoint hyperlinks Updated template Added a flow chart P.7. Removed SharePoint training requirement Section 1 – added “other publications and notices” to the first sentence, first paragraph. Section 1 item 2 – further developed the requirements that occur when an update with impacts to the Center is reviewed. Section 1 item 4 – added data points to the monthly report. Added impacts (A.3) to definitions in Appendix A.
D	06/28/2019	<b>Reorganized P3.</b> <b>Section P.8 – Added record retention.</b> <b>Section 4: Items b, e, f, g and h were rewritten as action statements for clarity. Item l changed to indicate review closure date rather than date of next update. Specified that closed item is to remain on report one iteration past closure date. Note added at the end of the section requiring a next action date or closed date for each item.</b> <b>Section 5.b.1 added more explicit directions for exporting the list.</b> <b>Updated hyperlinks.</b> <b>Minor grammatical edits made throughout including removing many unnecessary ‘shall’ statements.</b>

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		<b>Changed formatting.</b> <b>Updated flow diagram to correct out arrow from ‘Update LOR in EMS’.</b>
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For Best Practices refer to:

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

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