



Work Instruction (WI)

DIRECTIVE NO. 250-WI-8500.3.1E
EFFECTIVE DATE: 06/03/2019
EXPIRATION DATE: 06/03/2024

APPROVED BY Signature: Original Signed By
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TITLE: Chief, Medical and Environmental Management
Division

COMPLIANCE IS MANDATORY

Responsible Office: 250 / Medical and Environmental Management Division

Title: Satellite Accumulation Area and Waste Collection Site Inspections

PREFACE

P.1 PURPOSE

The purpose of this document is to provide guidance for conducting Satellite Accumulation Area (SAA) and Waste Collection Site (WCS) inspections at Goddard Space Flight Center (GSFC).

P.2 APPLICABILITY

- a. This Work Instruction applies to all Medical and Environmental Management Division (MEMD) personnel conducting annual SAA/WCS inspections at GSFC's Greenbelt Site 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. 40 CFR Part 262, Resource Conservation and Recovery Act (RCRA) Regulations
- b. COMAR 26.13.03.02 – Hazardous Waste Determination
- c. COMAR 26.13.03.05 – Pre-transport Requirements
- d. GPR 8500.3 - Waste Management
- e. GSFC Form 23-63 - Generator's Inspection Record: Satellite Accumulation Area
- f. GSFC Form 23-66 - Inspection Record: Satellite Accumulation Area form

P.4 CANCELLATION

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P.5 TOOLS, EQUIPMENT, AND MATERIALS

- a. Personal Protective Equipment (PPE) should coincide with the safety requirements of the inspected area. Coordination with SAA/WCS Points of Contact (POC) will occur prior to the inspection to insure that proper PPE is worn.
- b. MEMD handheld personal digital assistant (PDA)

P.6 SAFETY PRECAUTIONS AND WARNINGS

The SAA/WCS POC or their designee will escort MEMD representative(s) for the duration of the annual inspection. Any special precautions shall be discussed with the POC prior to the inspection. To ensure all safety precautions are followed, additional documents such as the Chemical Hygiene Program, GPR 1700.2 may be reviewed prior to conducting the inspection.

P.7 TRAINING

Persons conducting inspections shall have, as a minimum, Occupational Safety and Health Administration Hazard Communication and GSFC Hazardous Waste Management training.

P.8 RECORDS

Record Title	Record Custodian	Retention
Annual SAA/WCS Inspection 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

None.

Instructions

1. Scheduling Inspections

A representative from MEMD will request a copy of the Annual Safety Inspection schedule from the Occupational Safety and Health Division (Code 360). The Annual Safety Inspection schedule assigns certain buildings to be inspected each month. MEMD will conduct SAA/WCS inspections within the same month of Safety's inspection of each building. Variations to the one month window must be coordinated and approved by the Civil Servant Hazardous Waste Program Manager.

2. Gather Data Prior to the Inspection

The MEMD inspector should compile a list of SAA/WCS locations with "Open Containers – In Use" status from the hazardous waste database. SAA/WCS POCs for the areas to be inspected will be contacted at the beginning of that month to schedule the inspection. It is preferred that SAA/WCS POCs are present for the inspection to ensure access to the SAA/WCS and to answer questions regarding waste generation activities. Information for the listed SAA/WCS locations shall be collected from the hazardous waste database. General information that should be collected from the hazardous waste database prior to the SAA/WCS inspection includes, but is not limited to: SAA/WCS Point(s) of Contact, supervisor, organization code, active waste profiles, container validation, in addition to any previous inspections that may indicate outstanding or repetitive findings for that location. The inspector may reference a Greenbelt Facility Map in order to locate the site being inspected.

3. Inspection Process

The inspection process follows the format of GSFC Form 23-66, Inspection Record: Satellite Inspection Record. This form will assist in writing a more detailed report of findings for each location. This form is available electronically on MEMD handheld PDAs, which will be used to document the inspection. In addition to GSFC Form 23-66, the following data will be validated:

- a. SAA/WCS location and placement - MEMD shall validate that the location of the SAA/WCS is compliant with regulations in current EPA/MDE/ RCRA guidance (e.g. "line of sight", same room, etc.). If the location is questionable, the Civil Servant Hazardous Waste Program Manager will validate the location.
- b. Generator information for the inspected SAA/WCS locations shall be compared to the information MEMD has maintained in the hazardous waste database. POCs will be validated by the supervisor responsible for the SAA/WCS prior to scheduling the inspection. Any changes to the POC information will be updated.

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- c. Waste Profile Inventory from the hazardous waste database shall be compared to the waste being generated and/or accumulated at that location over the past year. All new or changed profiles that have not been identified to MEMD will be noted and a ticket to the Management Operations Services and Information (MOSI) will be submitted for 'Request for Material Characterization' in order to facilitate documentation of the new profile.
- d. Verify that the SAA/WCS has been provided the proper resources for SAA/WCS management. SAA/WCS POCs should possess a Hazardous Waste Generator Binder, which contains documents that outline proper SAA/WCS management, current waste profiles, GSFC Form 23-63, Generator's Inspection Record: Satellite Accumulation Area, annual training records for generators, etc. SAA/WCS locations also should have proper signage which indicates the location, POC, contact information, and a barcode label.
- e. Documentation –MEMD shall inspect GSFC Form 23-63 to verify that the records are completed once a month in accordance with GPR 8500.3. MEMD will verify that SAA/WCS POCs have provided annual training records for all waste generators.
- f. Developing updates to SAA/WCS signs, binders, new profiles, or waste processes shall be scheduled within 5 working days of the inspection.
- g. SAA/WCS inspection findings shall be documented using the Safety, Health, and Environmental tracking (SHEtrak) system. Findings will be available for release to SAA/WCS supervisors within 5 working days of the completion of the inspections. Corrective actions must be taken by supervisors and POCs within the time allotted in SHEtrak for the issued finding.

4. Final Report

The Annual SAA/WCS Inspection Report shall be submitted to the Civil Servant Hazardous Waste Program Manager for approval by the last working day of January. The report will detail trends in positive and negative findings, encompassing the current and past three inspection years. The report will also include top ten RCRA findings from the EPA annual report. Recommendations for improvement will be made in the final report. Query all SAA/WCS inspections and findings for the calendar year from SHEtrak and include them as an appendix to the Annual SAA/WCS Inspection Report.

Flow Diagram

None

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Appendix A – Definitions

- A.1** Hazardous Waste Generator – Any person whose act or process produces a hazardous waste that is identified or listed in 40 C.F.R. 261, or in COMAR 26.13.02.
- A.2** Other Regulated Waste - Wastes that are not regulated as hazardous waste under RCRA. These are solid wastes that need to be managed and disposed of due to the constraints, limitations, or requirements listed in GSFC permit(s) or general environmental compliance.
- A.3** Point of Generation – The work area (e.g., laboratory fume hood) where wastes initially accumulate.
- A.4** Satellite Accumulation Area – An area designated by MEMD to be an accumulation area for hazardous waste at or near the point of generation; under control of the operator of the process generating the waste; until proper disposal through MEMD is arranged.
- A.5** Waste Collection Site - An area designated by MEMD to be staging area for other regulated waste (non-RCRA).
- A.6** 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

EPA	Environmental Protection Agency
GSFC	Goddard Space Flight Center
MDE	Maryland Department of the Environment
MEMD	Medical and Environmental Management Division
MOSI	Management Operations Services and Information
PDA	Personal Digital Assistant
POC	Point Of Contact
PPE	Personal Protection Equipment
RCRA	Resource Conservation and Recovery Act
SAA	Satellite Accumulation Area
SHetrak	Safety, Health, and Environmental Tracking System
WCS	Waste Collection Site

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CHANGE HISTORY LOG

Revision	Effective Date	Description of Changes
Baseline	01/20/2010	Initial Release
A	03/26/2010	Changed all references to Safety and Environmental Division (S&E) to Medical and Environmental Management Division (MEMD) due to division name change. Updated signature block.
B	01/28/2011	Section 3 - Documented changes made to reflect the way findings are entered into GPRS and to user organization. Section 3 - Documented changes made to reflect the updating and scheduling of new profiles. Section 4 - Specific due date provided regarding Final Report.
C	09/05/2014	P.5 – Updated requirements for the use of PPE during SAA inspections. P.8 – Updated Record Title and Retention. Section 1 – MEMD will conduct inspections within the same month as Safety instead of two weeks. Section 2 – Updated this section to include waste collection data that is to be gathered prior to scheduling the SAA inspection. Section 3 – Added reference to the MEMD PDA, with which the inspections are performed. Section 3 – POCs shall be validated by the supervisor responsible for the SAA prior to the scheduling of the inspection. Section 3 – eMOD tickets will be submitted for updates to waste characterizations. Section 3 – Hazardous Waste Generator binders and SAA signs with a barcode will be provided to all waste generators as a resource for hazardous waste generation information and a repository for records and training. Sections 3 – SAA signs, binders, and profile updates will be delivered within 5 days of the inspection.

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		<p>Section 3 – All findings will be documented in SHEtrak; GPRS and email notifications will no longer be utilized for finding documentation.</p> <p>Appendix B – Updated acronyms; added eMOD and SHEtrak, removed GPRS.</p> <p>Appendix C – Removed Finding Template</p>
D	09/09/2016	<p>P.3. Added COMAR 26.13.03.02 – Hazardous Waste Determination</p> <p>P.7. Changed GSFC RCRA Generator Training to Hazardous Waste Management Training</p> <p>P.8. Updated retention.</p> <p>Section 1.0 Changed 350 to 360.</p> <p>Section 2.0 Changed C350 TO 360, added container validation.</p> <p>Section 3.0 Changed MEMD Program Manager to Civil Servant Hazardous Waste Program Manager for continuity, added SAA location clarification and guidance.</p> <p>Section 3.c Changed to ‘Request for Material Characterization.’</p> <p>Added new requirement for final report.</p> <p>Appendix B – Updated acronyms; added EPA and MDE.</p>
E	06/03/2019	<p>P.5. Added MEMD PDA.</p> <p>Section 3.c Changed eMOD to MOSI.</p> <p>Appendix A- Defined other regulated waste and Waste Collection Site</p> <p>Appendix B – Updated acronyms; added MOSI and PDA, removed eMOD.</p> <p>Minor wording changes made throughout to comply with rules regarding “shall” statements.</p> <p>Added Waste Collection Site (WCS) throughout the document.</p>

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