

National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



November 26, 2012

NID 8500-81
NPD 8500.1B

Reply to Attn of:

TO: NASA Center Directors

FROM: Assistant Administrator for Strategic Infrastructure

SUBJECT: NASA Interim Directive (NID) on Tenant-Generated Hazardous Waste

In accordance with the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), NASA retains any future liability for all hazardous wastes disposed under the authority of NASA's EPA ID number, regardless of its source. Given the importance of managing this long-term Agency liability, the following NID is enacted:

Hazardous waste generated by onsite tenant organizations/agencies shall be manifested and disposed using the tenant's EPA ID number as required by regulations. Although tenants may be allowed to utilize the same contractors as NASA for hazardous wastes, NASA EPA ID numbers will no longer be used for disposal of tenant hazardous wastes.

NASA Centers and Component Facilities shall take the administrative or other actions required to execute the provisions of this NID within six months of the effective date. Waivers or deviations to this interim directive must be submitted in writing to the Director of Environmental Management, NASA Headquarters.

This interim directive is issued under NPD 8500.1B NASA Environmental Management. This NID applies to all NASA Centers and Component Facilities. It is valid for one year from the effective date of this memorandum, unless superseded by the appropriate revision of NPD 8500.1.

Questions regarding this NID and its implementation should be directed to James Leatherwood, Director of Environmental Management, NASA Headquarters, at james.leatherwood-1@nasa.gov.

A handwritten signature in blue ink, appearing to read "Olga M. Dominguez".

Olga M. Dominguez

CC:
Center Environmental Managers
HQ OGC
Center OGC

Bloxon, Deborah F. (HQ-LP030)

From: Schuffert, Tiffany (HQ-LE050)
Sent: Monday, September 17, 2012 1:41 PM
To: Johnson, Fatima C. (HQ-LD000)
Cc: Jennings, Nanette (HQ-LP030); Parker, Cheryl E. (HQ-LP030); Bloxon, Deborah F. (HQ-LP030); Feinberg, Shari R. (HQ-MB000); Barrett, David G. (HQ-MB000); Schuffert, Tiffany (HQ-LE050)
Subject: FW: NID--Tenant Generated Hazardous Waste

Hi Fatima!

This does not need to go to the unions. There's no change in employee working conditions.

~Tiffany

From: Johnson, Fatima C. (HQ-LD000)
Sent: Monday, September 17, 2012 1:36 PM
To: Schuffert, Tiffany (HQ-LE050); Ebron, Enzie M. (HQ-IP000); Burns, Laura (HQ-MA000); POWERS, MICHAEL L. (HQ-JD000)
Cc: Jennings, Nanette (HQ-LP030); Parker, Cheryl E. (HQ-LP030); Bloxon, Deborah F. (HQ-LP030); Atcherson, Robin L. (HQ-LD000)
Subject: NID--Tenant Generated Hazardous Waste

All:

Please find attached, a draft NID on Tenant Generated Hazardous Waste for your review and concurrence. With the exception of the Union, your concurrence is requested by October 1, 2012. Should you have questions or concerns, please feel free to contact me.

Thanks,



NID on
Tenant-Generat... Directive (NID) h...

NASA Interim

Fatima C. Johnson, Esq.
Executive Officer
Office of Strategic Infrastructure, NASA
202-358-1631 (P)
202-258-2826 (F)

Bloxon, Deborah F. (HQ-LP030)

From: Ebron, Enzie M. (HQ-IP000)
Sent: Tuesday, October 09, 2012 10:11 AM
To: Johnson, Fatima C. (HQ-LD000)
Cc: Atcherson, Robin L. (HQ-LD000); Jennings, Nanette (HQ-LP030); Parker, Cheryl E. (HQ-LP030); Bloxon, Deborah F. (HQ-LP030); Meredith, Shelley J. (HQ-IM030)
Subject: FW: NID--Tenant Generated Hazardous Waste

OCFO concurred on the attached NID.

Enzie



NID -
Tenant-Generat...

From: Johnson, Fatima C. (HQ-LD000)
Sent: Monday, September 17, 2012 1:36 PM
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Cc: Jennings, Nanette (HQ-LP030); Parker, Cheryl E. (HQ-LP030); Bloxon, Deborah F. (HQ-LP030); Atcherson, Robin L. (HQ-LD000)
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Fatima C. Johnson, Esq.
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Office of Strategic Infrastructure, NASA
202-358-1631 (P)
202-258-2826 (F)

Bloxon, Deborah F. (HQ-LP030)

From: Burns, Laura (HQ-MA000)
Sent: Thursday, September 20, 2012 9:56 AM
To: Johnson, Fatima C. (HQ-LD000)
Subject: FW: NID--Tenant Generated Hazardous Waste

Fatima,

Please see Tom Hayes comments and concurrence below.

Laura

Laura Burns

Law Librarian for the Office of the General Counsel
NASA Headquarters
300 E Street, SW, 9V35
Washington, DC 20546

202-358-2078 (v)

From: HAYES, THOMAS M. (HQ-MB000)
Sent: Wednesday, September 19, 2012 8:18 AM
To: Burns, Laura (HQ-MA000)
Cc: Batkin, Mark (HQ-MB000)
Subject: RE: NID--Tenant Generated Hazardous Waste

Hi Laura – the word document with the interim directive looks fine. Mark brought this issue (not allowing tenants to use a NASA EPA ID # to dispose of hazardous waste) up with the clients several months ago, and it looks like they are moving forward to fix the problem. I couldn't open the other attachment, but from the title it looks like it is the same thing. Recommending sending a concurrence. Thanks. Tom

From: Burns, Laura (HQ-MA000)
Sent: Monday, September 17, 2012 4:56 PM
To: HAYES, THOMAS M. (HQ-MB000)
Subject: FW: NID--Tenant Generated Hazardous Waste

Hi Tom,

Please review the attached NID and provide any comments/changes to me by Friday, September 28. Thank you,

Laura

Laura Burns

Law Librarian for the Office of the General Counsel
NASA Headquarters
300 E Street, SW, 9V35
Washington, DC 20546

202-358-2078 (v)

From: Johnson, Fatima C. (HQ-LD000)

Sent: Monday, September 17, 2012 1:36 PM

To: Schuffert, Tiffany (HQ-LE050); Ebron, Enzie M. (HQ-IP000); Burns, Laura (HQ-MA000); POWERS, MICHAEL L. (HQ-JD000)

Cc: Jennings, Nanette (HQ-LP030); Parker, Cheryl E. (HQ-LP030); Bloxon, Deborah F. (HQ-LP030); Atcherson, Robin L. (HQ-LD000)

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Executive Officer
Office of Strategic Infrastructure, NASA
202-358-1631 (P)
202-258-2826 (F)

Bloxon, Deborah F. (HQ-LP030)

From: POUSSARD, RONALD A. (HQ-LP011)
Sent: Thursday, November 15, 2012 3:35 PM
To: Johnson, Fatima C. (HQ-LD000)
Subject: Re: NID--Tenant Generated Hazardous Waste

Fatima, Can you send me a Word version of the document. I can't open the document you sent. I apologize for the delay in responding. Ron

On 10/9/12 10:34 AM, "Johnson, Fatima C. (HQ-LD000)" <fatima.c.johnson@nasa.gov> wrote:

Hi Ronald:

I sent this to Mike a couple of weeks ago, thinking he was still the NODIS POC for procurement. I just found out today that you are now the person as it was not updated on the ALR homepage when I sent the original email. Everyone else has reviewed/concurred and we need Procurement's concurrence to move forward. If at all possible, since this is a short document, can we get you office's concurrence by the end of the week?

Thanks,

Fatima C. Johnson, Esq.
Executive Officer
Office of Strategic Infrastructure, NASA
202-358-1631 (P)
202-258-2826 (F)

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Fatima C. Johnson, Esq.
Executive Officer

Office of Strategic Infrastructure, NASA

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