



# NEMS ENVIRONMENTAL MANAGEMENT PROGRAM

<b>PROGRAM NAME:</b>	Wastewater Program		
<b>SIGNIFICANT ENVIRONMENTAL ASPECT(S):</b> Wastewater (Liquid Discharges to Sanitary System)	<b>DOCUMENT NUMBER:</b>	TBD	
	<b>DATE REVISED:</b>	09/27/07	
	<b>REVISION NUMBER:</b>	1	
	<b>SUNSET DATE:</b>	11/20/07	
	<b>PROGRAM LEAD:</b>	Mr. Mark Miller	
<b>SECTION 1 – PROGRAM DESCRIPTION</b>			
The NIH Bethesda Campus Sanitary Sewer Compliance Program purpose is to revise existing treatment systems and establish additional treatment systems, as needed, to further improve NIH compliance with the Washington Suburban Sanitary Commission (WSSC) Discharge Authorization Permit (DAP).			
<b>SECTION 2 – GOALS AND OBJECTIVES</b>			
<b>FIVE-YEAR GOAL:</b> Improve quality of Waste Water discharge from NIH Bethesda Campus  <i>Justification: Consistent with NIH Discharge Authorization permit Requirements</i>	<b>Performance Indicator(s):</b> <ul style="list-style-type: none"> <li>▪ water chemistry modeling completed</li> <li>▪ Neutralization/equalization systems installed</li> </ul>	<b>Resource requirements:</b> No additional resources required	
<b>A. Objective:</b> Complete water chemistry modeling	<b>Performance Indicator(s):</b> modeling completed	<b>Responsibility:</b> Mark Miller	<b>Timeframe:</b> December 2007
<b>B. Objective:</b> Install and maintain neutralization/equalization systems as lab projects are implemented	<b>Performance Indicator(s):</b> Neutralization/equalization systems installed	<b>Responsibility:</b> Mark Miller	<b>Timeframe:</b> December 2007
<b>SECTION 3 – PROGRAM DESCRIPTION, SIGNIFICANCE, IMPACTS AND REQUIREMENTS</b>			
<b>REASON(S) FOR SIGNIFICANCE:</b>	<ul style="list-style-type: none"> <li>a. The NIH has a Discharge Authorization Permit (DAP) issued by the Washington Suburban Sanitary Commission (WSSC). WSSC regulates and controls the wastewater discharged from the NIH Bethesda Campus. NIH's wastewater has specific limits for toxic organics, metals, and pH from laboratories and support facilities. Failure by NIH to comply with these wastewater limits can result in WSSC restricting NIH's wastewater discharge and ultimately restricting NIH's ongoing research activities and future expansion efforts. Additionally, WSSC can also impose fines, citations, and other sanctions if NIH violates WSSC's wastewater discharge limits. These other sanctions could include limits on the discharge of low-level radioactive wastewater from research activities.</li> <li>b. Soil contamination</li> <li>c. Surface water contamination</li> </ul>		

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	d. Ecological damage e. Human health impact f. Biological material dispersal
<b>POTENTIAL ENVIRONMENTAL/ ORGANIZATIONAL IMPACTS:</b>	a. Legal or other requirement b. Potential organization/financial impact that NIH considers to be high c. Potential community relations/public perception impact that NIH considers to be high d. Potential environmental impact that NIH considers to be high e. Potential health impact that NIH considers to be high
<b>LEGAL AND OTHER REQUIREMENTS:</b>	a. Refer to NIH Bethesda Environmental Permit Matrix (Environmental Compliance Section, DEP, ORF, Shared Drive)

**SECTION 4 – OPERATIONAL CONTROLS**

ACTIVITY(IES) THAT GIVES RISE TO ASPECT	CONTROL(S)	RESPONSIBLE PERSON	MONITORING	RECORDS	ACTION TAKEN IF CONTROL FAILS
Campus Master Planning	5-Year Master Plan & EIS	<ul style="list-style-type: none"> <li>▪ Division of Facilities Planning</li> <li>▪ Environmental Compliance Branch (ECB)</li> </ul>	TBD	TBD	TBD
Pre-project planning	Master Plan PDRI	<ul style="list-style-type: none"> <li>▪ Div. of Policy &amp; Program Assessment (DPPA)</li> <li>▪ Chief Engineer</li> <li>▪ Division of Capital Project Mgt. (DCPM)</li> <li>▪ Div. of Property Mgt. (DPM)</li> </ul>	Reviewed by HHS for each project	<ul style="list-style-type: none"> <li>▪ PDRI</li> <li>▪ HHS Review</li> </ul>	Additional review and updated PDRI
Decommissioning, Renovation, Demolition, and Site Work (e.g., digging, grading, paving of impervious surfaces,	<ul style="list-style-type: none"> <li>▪ Decommissioning Matrix</li> <li>▪ Decommissioning SOP</li> <li>▪ Plans &amp;</li> </ul>	<ul style="list-style-type: none"> <li>▪ Div. Capital Project Management</li> <li>▪ Div. Property Mgt.</li> <li>▪ ECB</li> </ul>	TBD	<ul style="list-style-type: none"> <li>▪ Decommissioning Plan &amp; Design Documents</li> <li>▪ Decommissio</li> </ul>	<ul style="list-style-type: none"> <li>▪ Reworked EPCRA Spill Report Cleanup</li> <li>▪ Corrective Actions</li> </ul>

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etc.)	<ul style="list-style-type: none"> <li>Specifications</li> <li>Enviro. Checklist for Projects</li> </ul>			ning Matrix	
New Building design	<ul style="list-style-type: none"> <li>Plans &amp; Specifications</li> <li>Design Policy Guidelines</li> </ul>	DPPA	Design Review Process	PIN System	<ul style="list-style-type: none"> <li>Corrective Action Taken</li> <li>Updated Guidelines</li> </ul>
New Construction	<ul style="list-style-type: none"> <li>Plans &amp; Specifications</li> <li>Design Policy Guidelines</li> <li>Discharge Authorization Permit (DAP)</li> <li>MOU with WSSC</li> </ul>	<ul style="list-style-type: none"> <li>Project Officer (DAP)</li> <li>DEP (MOU)</li> </ul>	DEP Monitors Compliance w/ DAP and MOU	WSSC Requirements Document	Update DPG Indirect Corrective Action (e.g., NOV)
Utilities Work	Design Utilities Plan	Project Officer	TBD	TBD	TBD
Use of porta-pots and trailers at construction sites	<ul style="list-style-type: none"> <li>WSSC License for Operators</li> <li>Applicable MOU</li> </ul>	Project Officer	WSSC Authority	<ul style="list-style-type: none"> <li>MOU</li> <li>WSSC Codes</li> </ul>	Cease & Desist Orders
Segregate & Manage Total Toxic Organics (e.g., Priority Pollutants)	<ul style="list-style-type: none"> <li>WSSC License</li> <li>TTO Mgt. Plan</li> <li>NIH Manual Issuance</li> </ul>	<ul style="list-style-type: none"> <li>Users (Researchers)</li> <li>DEP Resource Recovery Branch</li> <li>Project Officer for Waste Mgt.</li> </ul>	WSSC Monitor	<ul style="list-style-type: none"> <li>Part B Permit</li> <li>WSSC Discharge Authorization Permit (DAP) Compliance Report</li> </ul>	NIH Corrective Actions as per WSSC Directive (Study or Plan)
<i>Haz Mat Response and Clean-Up (ORS)</i>	<ul style="list-style-type: none"> <li>911</li> <li>Emergency Response Plan</li> </ul>	<ul style="list-style-type: none"> <li>ORS</li> <li>NIH Fire Department</li> <li>Waste Mgt. Branch (Contractor)</li> </ul>	<ul style="list-style-type: none"> <li>DEP</li> <li>NIH Fire Department</li> </ul>	<i>Spill Report</i>	<i>Corrective Actions In Accordance with DAP</i>
Fire Fighting Vehicle Washing & Maintenance	<ul style="list-style-type: none"> <li>OWS</li> <li>Interceptor</li> </ul>	<ul style="list-style-type: none"> <li>DPM</li> <li>NIH Fire Chief</li> </ul>	Downstream Monitoring	Pumping Records	Corrective Actions In Accordance with DAP

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	<ul style="list-style-type: none"> <li>Tank/WSSC Tank</li> <li>Select cleaning products/chemicals</li> </ul>	<ul style="list-style-type: none"> <li>(Oversees fire fighters)</li> <li>ORF (Maintenance Ops)</li> </ul>			
<i>Maintenance of Fire Equipment &amp; Systems (e.g., System Flushing) (ORS)</i>	<i>Process Batch Discharge Approval Process (DAP)/MOU (ORS)</i>	<ul style="list-style-type: none"> <li>DPM</li> <li>Fire Chief</li> <li>DEP</li> </ul>	<i>DEP</i>	<i>Process Batch Discharge (PBD) Report</i>	<ul style="list-style-type: none"> <li>Corrective Action</li> <li>Education</li> <li>Potential for NOV's</li> </ul>
<i>Fire Fighting (ORS)</i>	TBD	TBD	TBD	TBD	TBD
Radioactive Materials Use/Associated Issues (e.g., Isotopes, etc.)	<ul style="list-style-type: none"> <li>NRC/WSSC License</li> <li>NIH Waste Mgt. Manual Issuance</li> <li>DEP SOP (for low-level radioactive waste)</li> </ul>	<ul style="list-style-type: none"> <li>Division of Radiation Safety</li> <li>DEP</li> </ul>	<ul style="list-style-type: none"> <li>Quarterly NRC Monitoring</li> <li>DEP SOP Monitoring &amp; Division of Radiation Safety Monitoring</li> </ul>	<ul style="list-style-type: none"> <li>Discharge Monitoring Report</li> <li>NRC Report</li> </ul>	NRC & WSSC Corrective Actions
Chemical Use, Storage, and Transportation ( <i>Shipping and receiving of chemicals at NIH falls under NIH Office of Logistics and Acquisitions, as per Charlyn's email to GRP on 9/8/05</i> )	<ul style="list-style-type: none"> <li>RCRA Part B Permit</li> <li>Required safety training for NIH lab staff</li> <li>NIH DOSH Lab Survey Program</li> <li>Hazardous Waste Contractor Staff (certified chemists/staff)</li> <li>Division of Occupational Safety &amp; Health (DOSH) Training</li> <li>STORAGE</li> </ul>	<ul style="list-style-type: none"> <li>Users (Researchers)</li> <li>DEP Resource Recovery Branch</li> <li>DOSH</li> <li>Transportation Division</li> <li>DEP Haz Waste Contractor</li> <li>Materials Management Group</li> </ul>	<ul style="list-style-type: none"> <li>Spot checks by Haz Waste Contractor</li> <li>Regular Inspections</li> <li>Regular maintenance and inspection of carts</li> </ul>	<ul style="list-style-type: none"> <li>Monthly Training Status Report</li> <li>Training records</li> <li>Service Request Records</li> <li>Service contract</li> </ul>	<ul style="list-style-type: none"> <li>Corrective Actions to deliver additional or new containers (pans)</li> <li>Re-training as needed</li> <li>Restriction of duties</li> <li>Tote replacement</li> <li>Repair or replace carts</li> </ul>

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	<ul style="list-style-type: none"><li>▪ In-lab secondary containers (for haz waste only)</li><li>▪ TRANSPORTATION (incl. receiving &amp; distribution)</li><li>▪ Centralized receiving and distribution facility at Building #10</li><li>▪ Waste management facility (Building #21) is bermed to RCRA specifications, has no floor drains, and is coated with chemical resistant conductive material</li><li>▪ Receiving and Delivery personnel are trained to manage bulk chemicals</li><li>▪ Personnel delivering chemicals to users are DOT and OSHA HAZ COM qualified/trained</li><li>▪ Collection Totes used to transport</li></ul>				
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	<ul style="list-style-type: none"> <li>from lab</li> <li>▪ Enclosed collection carts provide secondary containment during transit</li> <li>▪ Spill kits are stored on carts</li> <li>▪ All shipments of chemicals off-site are packaged and containerized to DOT standards</li> </ul>				
Biological Materials Use, Storage, and Transportation (i.e., Bio-waste)	Physical Controls (e.g., negative pressure, air locks, filters, wastewater pretreatment, etc.)	<ul style="list-style-type: none"> <li>▪ DEP</li> <li>▪ DOSH</li> </ul>	TBD	TBD	TBD
Use of Cup Sinks (e.g., Fume Hoods)	<ul style="list-style-type: none"> <li>▪ DOSH Training</li> <li>▪ WSSC DAP</li> <li>▪ TTO Mgt. Plan</li> </ul>	<ul style="list-style-type: none"> <li>▪ Users (Researchers)</li> <li>▪ DOSH</li> <li>▪ DEP</li> </ul>	TBD	TBD	TBD
DI System (Deionized Water)	WSSC DAP	<ul style="list-style-type: none"> <li>▪ Project Officer</li> <li>▪ DPM</li> <li>▪ DEP</li> </ul>	TBD	TBD	TBD
Equipment Cooling (e.g., Cray Computer Cooling Water, etc.)	WSSC DAP	<ul style="list-style-type: none"> <li>▪ Users (Researchers)</li> <li>▪ DEP</li> </ul>	TBD	TBD	TBD
Lab Equipment	WSSC DAP	<ul style="list-style-type: none"> <li>▪ DEP</li> </ul>	TBD	TBD	TBD
Imaging (x-ray, CAT scans, etc.) and Photo development	WSSC DAP	<ul style="list-style-type: none"> <li>▪ Radiology Branch</li> <li>▪ DEP</li> </ul>	TBD	TBD	TBD
Human Tissue	<ul style="list-style-type: none"> <li>▪ WSSC DAP</li> </ul>	<ul style="list-style-type: none"> <li>▪ DCPM</li> </ul>	TBD	TBD	TBD

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Pathology/Histology (e.g., formaldehyde)	<ul style="list-style-type: none"> <li>▪ Segregate formaldehyde (5 gal. buckets)</li> <li>▪ Design Policy Guidelines (DPG)</li> </ul>	<ul style="list-style-type: none"> <li>▪ DPPA</li> <li>▪ Medical Pathology Waste (MPW)</li> <li>▪ DEP</li> </ul>			
Bio-Containment (Levels 3&4) and Decontamination and Sterilization	<ul style="list-style-type: none"> <li>▪ WSSC DAP</li> <li>▪ Pretreatment systems used to control pH, temperature, and constituents</li> <li>▪ DPGs</li> </ul>	<ul style="list-style-type: none"> <li>▪ Users (Researchers)</li> <li>▪ DEP</li> <li>▪ DOSH</li> <li>▪ DCPM</li> </ul>	TBD	TBD	TBD
Use of Electromagnetic Radiation Equipment (e.g., Cyclotron)	<ul style="list-style-type: none"> <li>▪ WSSC DAP</li> <li>▪ Radionuclide Tank Wastewater (Low-level radioactive waste tank)</li> <li>▪ Process Batch Discharge</li> </ul>	<ul style="list-style-type: none"> <li>▪ Div. of Radiation Safety</li> <li>▪ DEP</li> <li>▪ Chemical Research Center (CRC)</li> </ul>	TBD	TBD	TBD
Fermentation (Process Batch Discharge)	<ul style="list-style-type: none"> <li>▪ WSSC DAP</li> <li>▪ Process Batch Discharge</li> </ul>	<ul style="list-style-type: none"> <li>▪ Users (Researchers)</li> <li>▪ DEP</li> </ul>	TBD	TBD	TBD
Chemical Use Addressed in NIH Laboratories Section: Chemical Storage, Use, etc. (Above)	<ul style="list-style-type: none"> <li>▪ Clinical Center WSSC DAP</li> </ul>	DEP	Regular WSSC inspections at Clinical Center	TBD	TBD
Pharmaceutical Dispensing, Use and Disposal	<ul style="list-style-type: none"> <li>▪ Drug Enforcement Agency (DEA) Requirements</li> <li>▪ Chemical Waste Mgt.</li> </ul>	TBD	TBD	TBD	TBD

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Morgue & Autopsy Addressed in NIH Laboratories Section (Above)	<ul style="list-style-type: none"> <li>▪ WSSC Permit</li> <li>▪ DAP</li> <li>▪ Formaldehyde segregation</li> </ul>	TBD	TBD	TBD	TBD
Radioactive Materials Use/Associated Issues (e.g., Isotopes, etc.) Addressed in NIH Laboratories Section (Above)	<ul style="list-style-type: none"> <li>▪ NRC/WSSC License</li> <li>▪ NIH Waste Mgt. Manual Issuance</li> <li>▪ DEP SOP (for low-level radioactive waste)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Division of Radiation Safety</li> <li>▪ DEP</li> </ul>	<ul style="list-style-type: none"> <li>▪ Quarterly NRC Monitoring</li> <li>▪ DEP SOP Monitoring &amp; Division of Radiation Safety Monitoring</li> </ul>	<ul style="list-style-type: none"> <li>▪ Discharge Monitoring Report</li> <li>▪ NRC Report</li> </ul>	NRC & WSSC Corrective Actions
Cleaning of restrooms (e.g., use of lime-away for clogged drains, etc.)	WSSC DAP	<ul style="list-style-type: none"> <li>▪ DEP</li> </ul>	TBD	TBD	TBD
Parking Lot and Garages Maintenance (Water/detergent mix used by sweeper (to clean oil, transmission fluids, etc.) is directed to sanitary system inlet)	<ul style="list-style-type: none"> <li>▪ WSSC DAP (TTO limits, heavy metals, etc.)</li> <li>▪ MSDS</li> </ul>	<ul style="list-style-type: none"> <li>▪ DPM</li> </ul>	TBD	TBD	TBD
Animal Husbandry (e.g., handling, etc.)	WSSC DAP	<ul style="list-style-type: none"> <li>▪ VRB (Div. of Vet. Resources)</li> </ul>	TBD	TBD	TBD
Cage Washing	<ul style="list-style-type: none"> <li>▪ WSSC DAP</li> <li>▪ Equipment Manufacturer SOP</li> <li>▪ DPG</li> </ul>	<ul style="list-style-type: none"> <li>▪ VRB</li> <li>▪ DEP</li> <li>▪ DPPA</li> <li>▪ DCPM</li> <li>▪ DPM</li> </ul>	TBD	TBD	TBD
Feeding, Bedding Storage, and Disposal (Solids segregated and then water is discharged)	<ul style="list-style-type: none"> <li>▪ WSSC DAP</li> <li>▪ SOMAT (small animals)</li> <li>▪ Garbel (small</li> </ul>	<ul style="list-style-type: none"> <li>▪ VRB (Div. of Vet. Resources)</li> <li>▪ DEP</li> <li>▪ DPPA</li> </ul>	TBD	TBD	TBD

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to sanitary system)	<ul style="list-style-type: none"> <li>animals)</li> <li>▪ Effluent Tank (used to neutralize cage wash water)</li> <li>▪ Kennel Wash Down and sanitizing (Large animals)</li> </ul>				
Washing of Animal Transport Vehicles	<ul style="list-style-type: none"> <li>▪ Dedicated Truck Washing Facility</li> <li>▪ SOP not enforced, truck wash facility not always used, SOP should be re-issued (Kelly Privost)</li> </ul>	<ul style="list-style-type: none"> <li>▪ VRB Animal Transportation Services</li> </ul>	TBD	TBD	TBD
Operations of Utility Plant (e.g., maintenance of steam & chiller lines, etc.)	<ul style="list-style-type: none"> <li>▪ WSSC DAP</li> <li>▪ Process Batch Discharges</li> <li>▪ MSDS</li> <li>▪ Discharge Rates (flow) Control</li> </ul>	<ul style="list-style-type: none"> <li>▪ DEP</li> <li>▪ Project Officer</li> <li>▪ DCPM</li> <li>▪ DPPA</li> </ul>	TBD	TBD	TBD
Co-generation Unit (e.g., spill event)	<ul style="list-style-type: none"> <li>▪ OWS</li> <li>▪ 911</li> <li>▪ Emergency Response Plan</li> </ul>	<ul style="list-style-type: none"> <li>▪ PEPCO</li> <li>▪ DPM</li> <li>▪ DPPA</li> <li>▪ DEP</li> </ul>	TBD	TBD	TBD
Cooling Towers O&M	<ul style="list-style-type: none"> <li>▪ WSSC DAP</li> <li>▪ NPDES Sanitary Requirements</li> </ul>	<ul style="list-style-type: none"> <li>▪ MEO, Power Plant</li> <li>▪ DPM</li> <li>▪ DEP</li> <li>▪ DPPA</li> <li>▪ DCPM</li> </ul>	<ul style="list-style-type: none"> <li>▪ Monthly Monitoring</li> <li>▪ Annual MDE NPDES Inspection</li> </ul>	Discharge Monitoring Report (DMR)	Regulatory & Corrective Action
O&M of Boilers (e.g., Boiler blow-down	<ul style="list-style-type: none"> <li>▪ WSSC DAP</li> <li>▪ NPDES Sanitary</li> </ul>	<ul style="list-style-type: none"> <li>▪ DPM</li> <li>▪ DEP</li> </ul>	TBD	TBD	TBD

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activities)	Requirements	<ul style="list-style-type: none"> <li>▪ DPPA</li> <li>▪ DCPM</li> </ul>			
Emergency Generator Spills (Portable/stationary, e.g., ACRF Garage)	<ul style="list-style-type: none"> <li>▪ WSSC DAP</li> <li>▪ Physical Alarms, Berms, AST Control Measures</li> <li>▪ Spill Response Plan</li> </ul>	<ul style="list-style-type: none"> <li>▪ DPM</li> <li>▪ DEP</li> <li>▪ NIH Fire Dept.</li> </ul>	TBD	TBD	TBD
HVAC for NIH Campus (Steam & chiller lines, condensate from air handling units, etc.)	<ul style="list-style-type: none"> <li>▪ WSSC DAP</li> <li>▪ Process Batch Discharges</li> <li>▪ MSDS</li> <li>▪ Discharge Rates (flow) Control</li> </ul>	<ul style="list-style-type: none"> <li>▪ DEP</li> <li>▪ Project Officer</li> <li>▪ DCPM</li> <li>▪ DPPA</li> </ul>	TBD	TBD	TBD
Building Maintenance (Use of chemicals and lime-away)	<ul style="list-style-type: none"> <li>▪ WSSC DAP</li> <li>▪ TTO Mgt. Plan</li> </ul>	DPM (Plumbers & HVAC Mechanics)	TBD	TBD	TBD
Bulk Fuel Storage (e.g., USTs, ASTs, & Temporary Tanks)	<ul style="list-style-type: none"> <li>▪ Regulatory Specifications</li> <li>▪ NIH SPCC Plan</li> <li>▪ Spill kits on trucks for ASTs</li> <li>▪ Berms</li> <li>▪ Spill buckets for USTs/ASTs</li> </ul>	<ul style="list-style-type: none"> <li>▪ DEP (Compliance)</li> <li>▪ DPM (Tank Mgt.)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Regular inspections</li> <li>▪ Automatic tank monitoring system</li> <li>▪ Regular Integrity testing</li> </ul>	<ul style="list-style-type: none"> <li>▪ Monitoring and maintenance records</li> <li>▪ Compliance inspection report</li> <li>▪ NIH SPCC Plan</li> <li>▪ Vieter Roots print outs</li> </ul>	<ul style="list-style-type: none"> <li>▪ Replace, repair physical controls on failure</li> <li>▪ State Reporting Requirements</li> <li>▪ NIH SPCC Plan revisions (as needed)</li> <li>▪ Corrective Actions as a result of inspection/test findings</li> <li>▪ NIH Emergency Response Protocol for spills/releases</li> </ul>
Bulk Fuel Transfer During Fill/Dispensing Operations	<ul style="list-style-type: none"> <li>▪ Regulatory Specifications</li> <li>▪ NIH SPCC Plan</li> <li>▪ Spill kits on trucks for ASTs</li> </ul>	TBD	TBD	TBD	TBD

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	<ul style="list-style-type: none"> <li>▪ Berms</li> </ul>				
Parking of Vehicles (e.g., parking lot & garage maintenance)	<ul style="list-style-type: none"> <li>▪ WSSC DAP</li> <li>▪ Process Batch Discharges</li> </ul>	<ul style="list-style-type: none"> <li>▪ Public Works-Grounds Maintenance Branch</li> </ul>	<<See SW>> TBD	TBD	TBD
Dish Washing	<ul style="list-style-type: none"> <li>▪ WSSC DAP</li> <li>▪ Use of specialized products/cleaners (all commercially available)</li> </ul>	TBD	TBD	TBD	TBD
Cleaning	<ul style="list-style-type: none"> <li>▪ WSSC DAP</li> <li>▪ Use of specialized sanitizers/degreasers (all commercially available)</li> </ul>	TBD	TBD	TBD	TBD
Grease Storage and Traps	WSSC DAP (Requirements for cleaning & degreasing)	Food Services Operations	TBD	TBD	TBD
Receiving to Loading Docks	WSSC DAP (floor drains at some transfer points inside buildings)	Food Services Operations	TBD	TBD	TBD
Refrigeration	TBD	TBD	TBD	TBD	TBD
Real Estate Acquisition and Leasing	TBD	TBD	TBD	TBD	TBD
Management of Hazardous Waste (e.g., chemical); Non-Hazardous Waste; Medical Pathological Waste (MPW); Multi-Hazardous Waste	<ul style="list-style-type: none"> <li>▪ RCRA Part B Permit</li> <li>▪ WSSC DAP (Restricts discharges to sanitary system)</li> <li>▪ TTO Mgt. Plan</li> </ul>	<ul style="list-style-type: none"> <li>▪ DEP Resource Recovery Branch</li> <li>▪ DEP Environmental Compliance Branch</li> </ul>	TBD	TBD	TBD

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# NIH Environmental Management System

Take Action to Protect the Future

Document Number: TBD

Date Revised: 3/20/07

Revision Number: 1

Sunset Date: 11/20/07

(Including liquid non-hazardous waste)					
Management of Radiological Waste	<ul style="list-style-type: none"> <li>▪ RCRA Part B Permit</li> <li>▪ NRC Permit</li> <li>▪ WSSC DAP (radionuclides)</li> </ul>	<ul style="list-style-type: none"> <li>▪ DEP Resource Recovery Branch</li> <li>▪ NIH Radiation Safety</li> <li>▪ DEP Environmental Compliance Branch</li> </ul>	TBD	TBD	TBD
Cart/Tug Washer (e.g., sanitizing clean/dirty carts)	WSSC DAP	<ul style="list-style-type: none"> <li>▪ DEP</li> <li>▪ Bldg. 10 Housekeeping</li> </ul>	TBD	TBD	TBD
Chemical Discharge into Sanitary System (e.g., chemicals used for floor stripping & drain cleaning)	WSSC DAP DEP Training provided to staff	<ul style="list-style-type: none"> <li>▪ Bldg. 10 Housekeeping</li> <li>▪ DEP</li> </ul>	TBD	TBD	TBD
Weapons Cleaning ( <i>To be addressed in 2006</i> )	TBD	TBD	TBD	TBD	TBD
Procurement of chemicals ( <i>To be addressed in 2006</i> )	TBD	TBD	TBD	TBD	TBD
Conference Support Services ( <i>To be addressed in 2006</i> )	TBD	TBD	TBD	TBD	TBD
Instrument Fabrication ( <i>To be addressed in 2006</i> )	TBD	TBD	TBD	TBD	TBD
Instrument Loaner and Maintenance Operation ( <i>To be addressed in 2006</i> )	TBD	TBD	TBD	TBD	TBD
Chemical Use, Storage, and Transportation	<ul style="list-style-type: none"> <li>▪ WSSC DAP</li> <li>▪ Paint Spray Booth</li> </ul>	TBD	TBD	TBD	TBD

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Associated with Plumbing & Painting Activities (e.g., paint spray booth, metal shop degreasers, plumbers, etc.)					
Receiving/Distribution of Bulk Hazardous Materials	<ul style="list-style-type: none"> <li>▪ Secondary Containment Systems (e.g., sodium hydroxide system, etc.)</li> <li>▪ WSSC DAP</li> </ul>	<ul style="list-style-type: none"> <li>▪ Division of Occupational Safety &amp; Health (DOSH)</li> <li>▪ DEP</li> <li>▪ Public Works</li> </ul>	TBD	TBD	TBD
Onsite Storage of Bulk Hazardous Materials	<ul style="list-style-type: none"> <li>▪ WSSC DAP</li> <li>▪ Secondary Storage</li> </ul>	<ul style="list-style-type: none"> <li>▪ Division of Occupational Safety &amp; Health (DOSH)</li> <li>▪ Public Works</li> <li>▪ VRB</li> </ul>	TBD	TBD	TBD

**SECTION 5 – RELEVANT DOCUMENT(S)**

DOCUMENT NAME	LOCATION	RESPONSIBLE PERSON
NIH Division of Safety Environmental Protection Branch Sanitary Sewer Compliance Plan (August 2001)	TBD	TBD
NRC Permit for NIH low-level radioactive waste discharge	TBD	TBD
WSSC Plumbing and Gas Fitting Regulations (within DAP)	TBD	TBD

**SECTION 6 – COMPETENCY OF RESPONSIBLE PERSONS**

NAME/TITLE	BASIS FOR COMPETENCE
Environmental Compliance Officer ORF/DEP	TBD
Environmental Compliance Officer, Environmental Compliance Branch, DEP	TBD

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Program Manager, Federal Programs ORF/DPPA	TBD
ORS/Division of Occupational Safety	TBD
Project Director ORF/CPM	TBD
Management Program Specialist ORF/DPM/TST	TBD
Industrial Chemist	TBD

## SECTION 7 – AUTHORIZATION

<b>NAME:</b>	
<b>SIGNATURE:</b>	
<b>DATE:</b>	

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