ATTACHMENT 2 - FACILITY SELECTION CRITERIA

The purpose of the NECSAS program is to preserve NOAA resources by identifying gaps in compliance with Environmental, Safety and Occupational Health Regulations.

NECSAS is a risk control tool which investigates problems at an operational level and documents them so they may be viewed and addressed at every level of management. The criteria for selecting facilities to undergo compliance assessment must be attuned to the concerns of different levels of management, clearly express the concerns and address the controls needed to eliminate them at their root causes. The problems found must be corrected by addressing the root causes of the problem; not just the symptom that appears in the system as the problem.

The criteria are chosen not because they are problems; they were chosen because they are ancillary to potential problem sources and they may indicate an elevated potential to create or exacerbate a problem.

There are 3 assessment tiers and are defined as follows:

a. Tier I – On-site assessment performed by an independent 3rd party
b. Tier II – On-site assessment performed by qualified NOAA personnel external to the facility
c. Tier III – Off-site assessment using pre-established set of questionnaires

#	Question	Justification	Tier			Definition/Guidance
			I	II	III	
1	What is the total hazardous waste generated on-site per month on average for the last twenty four (24) months? a. Equal or greater than 1000 kilograms (or 2200 pounds). b. Between 100 kilograms to 1000 kilograms (or 220 to 2200 pounds). c. Less than 100 kilograms (220 pounds)	If a facility generates enough hazardous waste to require a large or small generator status, they have quantities of hazardous waste which increase their chances of exposing someone to a contaminant or violating RCRA standards. RCRA standards carry fines as well as citations. Conditionally exempt generators have small amounts of hazardous waste and therefore less chance of exposure or violating RCRA.	a	b	c	In general, a hazardous waste requires contractor support for the management, shipping, and disposal. The hazardous waste quantity can be found in the Department of Transportation (DOT) Uniform Hazardous Waste Manifests. How to calculate the average: a. Retrieve all DOT Uniform Hazardous Waste Manifests in the last 24 months. b. Tally the total quantity in pounds; and divide the total quantity by the number of months that spans from the oldest Manifest to the most recent one.

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2	What is the maximum total hazardous waste stored on-site at any given time in the last twenty four (24) months? a. Greater than 6000 kilograms (13200 pounds). b. Between 1000 to 6000 kilograms (2200 to 13200 pounds). c. Less than 1000 kilograms (2200 pounds).	Same as #1	a	b	c	How to determine to the maximum HW stored on-site at any given time? a. Retrieve all DOT Uniform Hazardous Waste Manifest documents, b. Review all manifests; and c. Select the manifest with the greatest quantity to answer this question.
3	Does the facility use or store chemicals with the following NFPA rating? a. Hazard code "4" in the Health (blue) or Reactive (yellow) section of the NFPA diamond. b. Hazard code "3" in the Health (blue) or Reactive (yellow) section of the NFPA diamond. c. Hazard code less than "3" in the Health (blue) or Reactive (yellow) section of the NFPA diamond.	This criterion separates the toxicity of the materials used. The most toxic materials give the greatest concerns Storage quantities increase or decrease the potential for a release and exposure to a person to occur.	a	b	c	 NFPA rating is created by the National Fire Protection Association. This is commonly known as the NFPA diamond label typically affixed to all chemical packaging or container. This label is divided into 4 distinct categories: The degree of hazard in all categories is rated by NFPA with a scale that goes from 0 to 4. 0 = Minimal 1 = Slight 2 = Moderate 3 = Serious 4 = Extreme

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4	Does the facility operate a bio-safety laboratory at the following level? a. Level 4. b. Level 3. c. Level 2. d. Level 1. e. No Bio-safety laboratory.	A facility that operates a lab with a higher bio-safety level will more likely encounter a higher probability of exposure or safety risk to NOAA employees.	a, b	c, d	e	Based on definitions from the Biosafety in Microbiological and Biomedical Laboratories (BMBL) manual by CDC and NIH, 5th edition, 2007. **Bio-safety Level 4** (BSL-4) is required for work with dangerous and exotic agents that pose a high individual risk of life-threatening disease, aerosol transmission, or related agent with unknown risk of transmission. **Bio-safety Level 3** (BSL-3) is applicable to clinical, diagnostic, teaching, research, or production facilities where work is performed with indigenous or exotic agents that may cause serious or potentially lethal disease through inhalation route exposure. **Bio-safety Level 2** (BSL-2) is similar to BSL 1 and is suitable for work involving agents that pose moderate hazards to personnel and the environment. It differs from BSL-1 in that 1) laboratory personnel have specific training in handling pathogenic agents and are supervised by scientists competent in handling infectious agents and associated procedures; 2) access to the laboratory is restricted when work is being conducted; and 3) all procedures in which infectious aerosols or splashes may be created are conducted in biological safety cabinets or other physical containment equipment. **Bio-safety Level 1 (BSL-1)** is suitable for work involving well-characterized agents not known to consistently cause disease in immune competent adult humans, and present minimal potential hazard to laboratory personnel and the environment. The laboratory is not necessarily separated from the general traffic patterns in the building. Work is typically conducted on open bench tops using standard microbiological practices. Special containment equipment or facility design is not required, but may be used as determined by appropriate risk assessment.
5	Does your facility have one of the following permits: a. NPDES permit for a discharge from an area where industrial operations are carried out or have limits for specific	A required emission permit of any media (e.g., soil, water, or air) is indicative of required regulatory oversight. The level of complexity in the permitting process depends on the	a, c	b, d, f	e, g, h	**NPDES -** National Pollutant Discharge Elimination System. **Non-Attainment Zone** is an area designated by EPA that does not meet federal air-quality standards. **TSS** - Total Suspended Solids. TSS is listed as a conventional pollutant in the U.S. Clean Water Act. It is a water quality

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	contaminants in the outflow. b. NPDES permit for a discharge from an area where research and development operations are carried out or have TSS as the only contaminant measured. c. Air emission permit that requires sampling of effluent. d. Air emission permit that requires calculation of effluent. e. Air emissions permit because of location in a non attainment zone. f. Other environmental permit for industrial activities (e.g., sandblasting, chipping, welding, and etc) which include measuring of effluent. g. Other environmental permit for non-industrial activities which does not include measuring of effluent. h. None	nature and location of operations/activities. Assessment is performed for certain types of permits to ensure regulatory compliance.				measurement expressed in milligram/liter.

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6	Does the facility conduct the following activities? a. Routine overhaul, maintenance, and dockside repair of NOAA ships or NOAA aircraft. b. Routine loading, repair and maintenance of small boat (watercraft under 300 gross tons). c. None of the above.	Dockside activities represent some level of safety risk. The risk level various depending on the nature of the operations and the tools used to complete such tasks.	a	b	c	**Loading is defined as activities that require** the use of derricks, cranes, or block and tackle rigs to move equipment or cargo from the docks. **Repair and maintenance operations are defined as e**ngine work, machining and installation of deck hardware or equipment, or repair of hull, bulkhead or deck structures is routinely performed at these locations by NOAA or contract personnel assigned to the station. **Small boat is defined in NAO 209-125 to include every description of watercraft less than 300 gross tons capable of being used as a means of transportation of person on water. Additionally, the term "Small Boat" includes boats leased, loaned, bare boat chartered (also referred to as demise chartered), or operated under any cooperative agreement with other government agencies, universities, or scientific organizations by or from NOAA, but does not include boats time chartered by NOAA.**
7	Does the facility have a Spill Prevention, Control, and Countermeasure Plan (SPCC) for petroleum products? a. Yes with greater than 10,000 gallons in total storage capacity. b. Yes with storage capacity between 1320 and 10,000 gallons. c. No SPCC plan or has a SPCC BMP	Environmental regulatory requirements various depending on the total quantity of storage capacity for petroleum products and the facility location in relation to navigable water.	a	b	c	**Petroleum products** include gasoline, diesel, heating oil, and lubricants. **SPCC BMP.** The Spill Prevention, Control and Countermeasure Best Management Plan (SPCC BMP) is not required by regulatory agency; however, it is deemed as a good management plan to have it in place to deal with petroleum spill.

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8	Does the facility have warehouse operations requiring the use of the following material handling equipment (check all applicable answers)? a. Powered Industrial Trucks b. Overhead cranes c. Pallet jacks d. No warehouse operation or no equipment required	The risk level various depending on the nature of the operations and the tools used to complete such tasks.	a, b	c	d	**Powered industrial truck** (PIT) is a mobile, power-driven vehicle used to carry, push, pull, lift or stack material. The definition for PIT applies to fork trucks, tractors, platform lift trucks, motorized hand trucks, and other specialized industrial trucks powered by electric motors or internal combustion engines. **Overhead crane** means a crane with a movable bridge carrying a movable or fixed hoisting mechanism and traveling on an overhead fixed runway structure. A crane may be installed on a track and moves across the room with the hoist also moves side by side across the room. It may be fixed to the floor and has an arm that moves in a semi-circle with a hoist on it (e.g., Jib Crane). This term includes mobile crane that may be mounted on truck, track-hoe, or rubber wheeled vehicles. **Pallet jack** means a hand-propelled wheeled platform, equipped with a mechanical hydraulic lifting device for moving palletized unit loads