

Avoid Verbal Orders

TO: ISC-8200/ISC Environmental Assurance

DATE: 11/10/2009

FROM: TA-B1C/NEPA Compliance

SUBJECT KSC Record of Environmental Consideration (REC)

CHECKLIST #: 7685

1. PROJECT INFORMATION

Project Title: Relocate Helicopter Operation from PAFB Hangar 751 to KSC SLF Hangar

Project Lead: Dennis Camacho, ISC-3210, 494-4974

Directorate Project No.: E1109260

EPB Reviewer: LPH

Facility No.: FROM BLDG. 0751 TO J6-2466

2. NEPA DETERMINATIONS

- a. **Categorical Exclusion per 14 CFR Part 1216.305(d)**
- b. **Environmental Assessment (EA) Required per KNPR 8500.1**
- c. **Environmental Impact Statement (EIS) Required per KNPR 8500.1**
- d. **Project on CCAFS:**

3. ENVIRONMENTAL REQUIREMENTS

- a. **Non-Permit Requirements** **YES** **NO**
- b. **Permit Requirements** **YES** **NO**

3.a.1. **POTENTIAL RELEASE LOCATION (PRL) SITE:** A PRL designation means a site has had historical operations which had the potential to impact the environment and is being investigated by the Remediation Group of the NASA Environmental Assurance Branch (TA-B1B). The proposed project is within PRL #187, SLF Landing Aids Control Building site. This area was recently identified as a PRL and is in the assessment stage. There is no data available yet and therefore no requirements at this time.

3.a.2. **HAZARDOUS/NON-HAZARDOUS WASTE:** All hazardous and non-hazardous wastes generated on KSC must be managed, controlled and disposed of per the KSC Waste Management requirements outlined in KNPR 8500.1. A Process Waste Questionnaire (PWQ), KSC Form 26-551 along with any supporting documentation (MSDS, product formulation, lab analyses) must be submitted to the IHA Waste Management Office for each waste stream generated. That office will then generate a Technical Response Package (TRP) which will give direction on proper handling, storage, and disposal of the waste stream. Please contact IHA Waste Management Services at 867-8640 if assistance is required.

3.a.3. **PAINT DISTURBANCE/REMOVAL:** This project may involve disturbance/removal of paint coatings. Unless known to be non-hazardous, the coatings must be sampled and analyzed for the 8 RCRA hazardous metals (Ag, As, Ba, Cd, Cr, Hg, Pb, and Se) and PCBs. Analysis should be performed by an AIHA certified laboratory. The requirements established in OSHA standards 29 CFR 1910.1200, and 29 CFR 1926.62 & 29 CFR 1926.1127 for lead and cadmium respectively, must be complied with if PCBs, and lead or cadmium are present. If the coatings contain heavy metals or PCBs, it is recommended that the control zone and personal protective equipment requirements established in the lead standard be complied with to prevent exposure to workers and adjacent unprotected areas. The sampling analysis will dictate the level of PPE required and the handling/disposal requirements. If you have questions about PPE requirements call John Sherwood, IHA-022, at 867-1210. Paint chips, rust, debris, blast media, etc. generated during preparation of metal surfaces and/or deconstruction will be contained and disposed of according to waste management guidelines given above in item 3.a.2.

3.a.4. **HAZARDOUS AND CONTROLLED WASTE (PAINT):** This project may involve the application of paint coatings. All practical precautions must be taken to eliminate the possibility of a release of material or waste into the surrounding environment (primers/paints) from the paint surface preparation and painting operation. Paint chips, rust, debris, blast media, etc. generated during preparation of metal surfaces will be contained and disposed of according to waste management guidelines given above in item 3.a.2. Please contact IHA Waste Management Services at 867-8640 for assistance.

3.a.5. **SPILL PREVENTION, CONTROL, AND COUNTERMEASURES (SPCC) PLAN:** The Kennedy Space Center SPCC Plan documents the procedures for the prevention, response, control, and reporting of spills of oil at KSC. This plan serves as a guide for personnel and organizations that are responsible for ensuring that all measures are taken to

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prevent and contain spills and leaks of oil in accordance with all applicable state and federal regulations. The Environmental Assurance Branch (TA-B1B) maintains a master list of transformers and associated containment information. Please include Tim Tyndall (IHA-200, 867-3659) on distribution for design reviews and notifications of meetings related to this project.

3.b.1. AIR EMISSIONS: The parts washer currently used at Hangar 751 is considered an insignificant emission source and if relocated to the SLF would be covered under the KSC Title V Air Operating Permit. If a parts washer is installed please provide information including design drawings, schematics, and description to Christine Vanaman (IHA-200, 867-3586). This information will be needed for permit renewal.

3.b.2. WATER RESOURCE PERMITTING (Industrial Wastewater): Helicopter washing operations will require an industrial wastewater permit from FDEP. Please submit the necessary permit application and supporting documentation to the NASA Permitting and Compliance Group (Doug Durham, TA-B1C, 867-8429). Contact Doug for assistance in developing permit application.

3.b.3. NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT: With the proposed addition of helicopter operations, the SLF will be listed as a facility on the KSC NPDES Stormwater Permit for Industrial Activity. This will require development of a Stormwater Pollution Prevention Plan (SWPPP) detailing erosion and turbidity controls for the site. Information on this requirement and development of the SWPPP can be obtained by contacting Doug Durham at 867-8429.

No other environmental issues were identified based upon the information provided in the KSC Environmental Checklist. This Record of Environmental Consideration (REC) does not relinquish the project lead from obtaining and complying with any other internal NASA permits or directives necessary to ensure all organizations potentially impacted by this project are notified and concur with the proposed project.

Due to potential changes in regulations, permit requirements and environmental conditions, statements in this REC are valid for 6 months and subject to review after this period. It is the responsibility of the project lead to notify the Environmental Management Branch (TA-B1C) if the scope of the project has changed since the original checklist was submitted.

cc: C. Brown/ISC-1395
J. Naas/ISC-8200
R. Traylor/ISC-8200
D. Camacho/ISC-3210

- 4 Upon evaluation of the subject project, the above determinations have been made and identified. Contact the Environmental Program Office (TA-B1C) at 867-8448 for re-evaluation should there be any modifications to the scope of work.**



John Shaffer

11/12/2009 1:22:56 PM

Date