

National Aeronautics and  
Space Administration  
**George C. Marshall Space Flight Center**  
Michoud Assembly Facility  
P.O. Box 29300  
New Orleans, LA 70189



Reply to Attn of: MP31 (640-02)

September 4, 2002

To: NASA Headquarters  
✓ JX/Ms. Olga Dominguez

Thru: MP31/Mr. Jerry Smelser  
Thru: AD10/Mr. James A. Elliott

SUBJECT: Request for Concurrence with a Categorical Exclusion Determination for the Building 110 Chilled Water System Project

Enclosures: (1) Record of Environmental Consideration  
(2) Letter from the Louisiana State Historic Preservation Officer regarding Building 110  
(Lockheed Martin Space Systems Company Reference 02MI-0548)

1. We are submitting this letter in accordance with the requirements of NASA Procedures and Guidelines (NPG) 8580.1, "Implementing the National Environmental Policy Act". This letter specifically addresses NASA National Environmental Policy Act (NEPA) requirements as they relate to the CoF FY02 Project Replace Chilled Water/Steam/Condensate Systems Building 110 (Phase I and Phase II) at the Michoud Assembly Facility (MAF). Per the referenced NASA requirement, we request a review and signature from the Marshall Space Flight Center attorney (as required by NASA Headquarters Code JE) on the Enclosure (1) Record of Environmental Consideration document. We also request support in obtaining the signature required by NASA Code JE on the Enclosure (1) document after approval by your attorney.

2. Section 3.3 of NPG 8580.1, Management-Level Roles and Responsibilities, delegates the responsibilities for implementing NEPA to each NASA Center's Environmental Management Office (EMO). Some of these responsibilities include evaluating proposed activities, developing and/or reviewing and approving required documentation, signing environmental decision documents on projects and programs having little or no environmental impact, etc. Current NASA Code JE policy also requires that NEPA Categorical Exclusion determinations for any project over \$1.5 million be reviewed and approved by the responsible NASA Center attorney and by NASA Code JE. Based on this policy the Enclosure (1) document requires this additional level of review and approval.

3. The subject CoF project involves the replacement of the chilled water piping within Building 110, the Vertical Assembly Building, which was constructed in 1963 and is an assembly building for the External Tank of the Space Shuttle. Modifications to the building include replacement of the chilled water piping within this building. The replacement of the piping involves minor penetrations of asbestos siding walls. The chilled water system replacement project will occur in phases. Phase I of the project will affect the north side of Building 110 and Phase II will affect the south side. The only potential significant environmental impact is that Building 110 is a building that has been identified as eligible for listing on the National Register of Historic Places. However, we have determined that there will be no adverse affects to the building as a result of this project. This determination was concurred with by the Louisiana State Historic Preservation Office in the Enclosure (2) letter.

4. We believe that this CoF project does not result in any NEPA extraordinary circumstances, cumulative effects, or public controversy. Also, the site is not a Greenfield and the proposed CoF activities are categorically excluded from the requirements of a NEPA Environmental Assessment. A Record of Environmental Consideration (REC) is included as Enclosure (1) for your signature/approval as required by NPG.8580.1.

5. Please return a signed copy of the Enclosure (1) REC to MAF ET Resident Office, Attn: Mr. Francis Celino, for the NEPA compliance file.

6. If you have any questions regarding this request, please contact Mr. Francis Celino at (504) 257-2629.

Very truly yours,



Stephen P. Brettel, Manager  
Michoud Assembly Facility

SRB:LA:st E1541-0731

Encl: E-Mail of Dr. Ann Hooker

REC

NEPA Checklist

Letter from SHPO of Louisiana

## RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

**Sponsoring Entity:** Office of Space Flight, Code M

**Project Title:** Replace Chilled Water/Steam/Condensate System Building 110  
(Phases I and II)

**Brief Description of the Project:**

This major CoF project involves the replacement of the existing chilled water/steam/condensate systems and related components within Building 110 (the Vertical Assembly Building).

**Anticipated Start Date and Duration:** July 2002 – December 2003

**Basis for Determination:** This project is considered ordinary maintenance or replacement of equipment or small structures which is presented as rationale for consideration as a categorically excluded action in Section 4.5 (1) of NPG 8580.1

**Decision:**

The subject project has been approved as categorically excluded.

The subject project has been denied for consideration as being categorically excluded.

Signature(s)

Allen Elliott 10/4/02

Title: Deputy Mgr, Environmental Engr. Dept.

Marshall Space Flight Center

\_\_\_\_\_  
NASA Headquarters Code JE

**EG.22 - Environmental Evaluation Checklist for MAF**Project Title: Replace Chilled Water/Steam/Condensate System Building 110 (Phases I and II) Date: 8/01/02 Initials: MLA

	<u>Yes</u>	<u>No</u>
1) Addition or modification of any: air pollutant emissions sources such as vent hoods, exhaust booths and exhaust stacks; stationary combustion sources including engines, boilers, furnaces, thermal oxidizers; air emissions control devices such as carbon absorbers, baghouses, scrubbers, and exhaust system filters.	X	
2) Addition or modification of any process involving paints, coating, surface cleaning or preparation, aqueous chemicals, curing or open storage of chemicals.		X
3) Addition or modification of any groundwater monitoring or recovery wells.		X
4) Addition or modification of any stormwater facilities including swales, ditches, culverts, ponds, or the borrow canal.		X
5) Discharge of any water, wastewater, or chemical substances onto or into the ground, groundwater, chemical sewer, sanitary sewer, or storm sewer.		X
6) Addition or modification of any wastewater treatment or storage unit or process.		X
7) Construction, demolition or operation involving use or storage of acids, caustics, solvents, paints, petroleum products, PCBs, CFCs, HCFCs, Halons, radioactive substances, hazardous/toxic chemicals or other regulated substances.		X
8) Addition or modification of any existing system or process which uses, treats or stores any acids, caustics, solvents, paints, petroleum products, asbestos, PCBs, CFCs, HCFCs, Halons, radioactive substances, hazardous/toxic chemicals or other regulated substances.		X
9) Any transportation of any hazardous waste off MAF property.	X	
10) Any electrical equipment being taken out of service including pole or pad mounted transformers, large capacitors or light ballast.		X
11) Any construction, demolition, or renovation involving Asbestos Containing Material (ACM) including floor tile, transite siding/ductwork/partitions, roofing material, or pipe, tank, chiller or boiler insulation.	X	
12) Any soils or sediments to be disturbed including digging, ditching, excavating, drilling, scraping, clearing, grubbing, pile driving, or dredging. <b>Note:</b> An MAF Dig Permit is required for these activities.		X
13) Any construction activities outside the MAF levee systems.		X
14) Any below ground tanks, storm, chemical or sanitary sewers to be removed or built over.		X
15) Will this project result in on-going generation of solid waste in quantities greater than 400 cu. yds. per month, medical or radiological wastes, waste requiring special handling (including: solvents, oils, cryogenes, refrigerants, halons, acids, caustics, PCBs, and any other wastes).		X
16) Use of fertilizers, insecticides, herbicides, rodenticides, biocides, or fungicides.		X
17) Activities generating noise of high levels (above 90 dBA) for prolonged times (greater than one hour).		X
18) Changes in land use patterns resulting in loss of more than 5 acres of currently undeveloped areas.		X

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- |   |     |
|---|-----|
| 19) Any activities affecting public recreation, esthetics, or public services (change of 10% or more in overall site energy consumption, increase in potable water use greater than 1000 gpd, increases in sewage amounts greater than 500 gpd, significant impacts to local transportation infrastructures, changes of 10% or more in site employment levels). | X   |
| 20) Modification or replacement of any existing system which will result in a reduction of chemical releases or emissions, other pollution prevention or waste minimization.  | X   |
| 21) Will this project incorporate energy efficient equipment or systems or impact the current energy demand .   | X   |
| 22) Will this project affect structures greater than 50 years old or Buildings 110, 420, or 480?  | X " |
| 23) Will this project affect flood plains or wetlands?  | X   |
| 24) Will this project affect the health and safety of children?   | X   |
| 25) Will this project have disproportionately high and adverse human health and environmental effects on minority and low-income populations?   | X   |
| 26) Will this project effect any protected species or protected areas?  | X   |

**Note: Any item marked "yes" requires assessment by Environmental Management**

**Record of Environmental Consideration**

Based upon Environmental Management Assessment, this project:

- (a) X is **categorically excluded** from the requirement for either and Environmental Assessment (EA) or Environmental Impact Statement (EIS) per 14 CFR 1216.305(d) and 14CFR 1216.305(e) and is not considered a major Federal action significantly affecting the quality of the human environment. This conclusion is based upon the determination that the effects of this project:
- Are not controversial, uncertain, and do not involve unique or unknown risks.
  - Do not include impacts to public health and safety, unique geographic resources, historic or cultural resources, endangered or threatened species, or other features having recognized value.
  - Do not include a threat of violation of federal, state, or local environmental laws.
- (b) \_\_\_\_\_ will require an EA per 14CFR 1216.305(a) and 14CFR 1216.305(b).
- (c) \_\_\_\_\_ will require an EIS per 14CFR 1216.305(c).

Assessor: M. Lisa Alexis

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**Environmental Management Review Data Sheet**

Project Title: Replace Chilled Water/Steam/Condensate System Building 110 (Phases I and II)

Prepared by: M. Lisa Alexis Date: 8/01/02

I. Based on Environmental Management's review the following permits must be modified and approved prior to the start of project construction.

<u>Permit</u>	<u>Estimated Date Permit Approved</u>
NA _____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

II. Based on Environmental Management's review the following permits must be modified and approved prior to the start of operations.

<u>Permit</u>	<u>Estimated Date Permit Approved</u>
NA _____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Note: 1) Although Building 110 is eligible for listing on the National Register of Historic Places, the Louisiana State Historic Preservation Office has concurred that this project will not have an adverse effect on the building.

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REVISION BY: DSS



KATHLEEN DABINEAUX BLANCO  
LIEUTENANT GOVERNOR

State of Louisiana  
OFFICE OF THE LIEUTENANT GOVERNOR  
DEPARTMENT OF CULTURE, RECREATION & TOURISM  
OFFICE OF CULTURAL DEVELOPMENT

PHILLIP J. JONES  
SECRETARY

LAUREL WYCKOFF  
ASSISTANT SECRETARY

July 2, 2002

Mr. Reynold J. Abadie, P.E.  
Director, Facilities & Environmental Operations  
Michoud Operations  
Lockheed Martin Space Systems Company  
P.O. Box 29304  
New Orleans, LA 70189

Re: Request for a Determination of Effect for Building 110  
(Vertical Assembly Building)  
Replacement of Chilled Water System  
Lockheed Martin Michoud Operations, Orleans Parish, LA

Dear Mr. Abadie:

Thank you for your letter of June 28, 2002, concerning the above-referenced maintenance project. The replacement of the chilled water system would have an effect on Building 110 (Vertical Assembly Building) which is eligible for listing on the National Register of Historic Places. However, the effect would not be an adverse effect.

If you have any questions please contact Mike Varnado at (225) 342-8160.

Sincerely,

A handwritten signature in cursive script, appearing to read "Laurel Wyckoff".

Laurel Wyckoff  
State Historic Preservation Officer

LW:MV:s