

# Avoid Verbal Orders

**TO:** TA-B3D/S. Stilwell

**DATE:** 7/17/2007

**FROM:** TA-B1C/NEPA Compliance

**SUBJECT** KSC Record of Environmental Consideration (REC)

**CHECKLIST #:** 7245

## 1. PROJECT INFORMATION

**Project Title:** Close/Demolish Facilities and Structures

**Project Lead:** Scott Stilwell, 867-5113, TA-B3D

**Directorate Project No.:** 97963.4 (REV A)

**EPB Reviewer:** LPH

**Facility No.:** K6-1198/J5-1299/M6

## 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**

\*\*\*\*\*ORIGINAL REC ISSUED 6/27/2007 LPH\*\*\*\*\*  
\*\*\*\*\*UPDATED TO INCLUDE M6-0328 & M7-0596\*\*\*\*\*  
\*\*\*\*\*UPDATED 11/17/2008 New EPOC, SWMU info., updated paint disturbance item\*\*\*\*\*

The NASA Environmental Management Branch (TA-B1C) has assigned Mike McDonnell, IHA-200, 867-9017 as the Environmental Point Of Contact (EPOC) for this project. Please add Mr. McDonnell's name to any lists or notifications of meetings related to this project. All questions relating to environmental issues should be forwarded to the EPOC section within the NASA Environmental Management Branch.

3.a.1 **SOLID WASTE MANAGEMENT UNIT - SWMU/POTENTIAL RELEASE LOCATION (PRL) SITE:** This project involves work in the boundaries of sites being investigated by the NASA Remediation Group of the Environmental Assurance Branch (Bob Kline, TA-B1B, 867-8415). There is surface soil contamination in the SE corner of the Fire Station #2 site (PRL #163). This project must be coordinated with the Remediation Project Manager, Bob Kline. There are no contamination concerns regarding the removal of the wooden shed at M6-596 (SWMU #93) and work may proceed as planned.

Note: After the shed, tank and pad are removed (M6-596 site), a soil sample should be collected from the area most likely to have been contaminated by oil seeping through the concrete or asphalt. The lab should be directed to analyze the sample for the FL Used Oil Analytical Group.

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 will involve disturbance/removal of paint coatings. Unless known to be non-hazardous, the coatings must be sampled and analyzed for PCBs and the 8 RCRA hazardous metals (Ag, As, Ba, Cd, Cr, Hg, Pb, and Se). Analysis should be performed by an AIHA certified laboratory. The requirements established in OSHA standards 29 CFR 1926.62 & 29 CFR 1926.1127 for lead and cadmium respectively must be complied with if lead and/or cadmium are present. If the coatings contain heavy metals, 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,

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IHA-022, at 867-1210.

### Recycling of painted materials:

In addition to the requirement for total metals analysis stated above, materials to be recycled must also be analyzed for PCBs. Painted concrete must have PCB and TCLP analyses performed to determine whether it will be accepted at the DARC Y for reuse. Concrete that fails TCLP for RCRA metals and/or contains PCBs > 50 ppm, will not be accepted at the DARC Y. Painted concrete must be segregated from unpainted concrete for placement in the DARC Y.

### Disposal of painted materials:

Any material with paint coatings must be sampled and analyzed for TCLP metals and PCBs to determine whether it will be accepted at the KSC Class III Landfill. All material, including concrete not accepted at the DARC Y, to be disposed of in the KSC Landfill must pass TCLP for RCRA metals. Items which fail TCLP analysis must be taken to an appropriate disposal site outside of KSC. The landfill will accept PCB bulk product waste (PCBs > 50 ppm) with prior notification and approval from the NASA Permitting and Compliance Office (TA-B1B) by way of a completed PCB Bulk Product Waste Notification Form (KSC Form 28-1085 NS). For additional information on these requirements contact John Matthews, TA-B1B, at 867-2943.

**SPECIAL NOTE (HOT WORK ON COATED METAL):** Where possible, hot work on painted/coated metal structures should be avoided. If hot work is necessary, affected paint/coating must be sampled for PCBs to determine if additional respiratory protection is required. Degradation of PCBs occur under moderate/extreme thermal conditions (such as torch work) causing PCB materials to degrade into dioxins and other by-product chemicals. Please consult with your organization's Industrial Hygiene representative prior to conducting hot work on any painted/coated surfaces.

**3.a.4. HAZARDOUS AND CONTROLLED WASTE (POLYCHLORINATED BIPHENYLS):** There is a potential for this project to encounter PCB contaminated materials/waste (caulking, paint coatings, electrical equipment, etc.). If PCB content is unknown, sampling must be performed. See KNPR 8500.1 Rev. A, Chapter 20 for PCB management guidelines. In addition to window caulking and electrical equipment, transformer concrete pads and other surrounding materials may contain PCB contamination. To determine if surrounding media and/or surfaces to be disturbed/disposed of have been contaminated with oils containing polychlorinated biphenyls by past actions contact IHA Waste Management. They will determine the applicable regulatory requirements and guidance for the proper management of the waste PCB materials. Please follow the PWQ/TRP process for waste disposal. Contact IHA Waste Management Services at 867-8642 for assistance.

**3.a.5. HAZARDOUS AND CONTROLLED WASTE (ASBESTOS CONTAINING MATERIAL):** This is a regulated material that can no longer be used in construction materials. Asbestos was incorporated into many building products and most commonly found in floor tile, roofing materials, caulking compounds, and insulation media. If this project will disrupt construction materials, an asbestos survey should be performed if one has not already been completed. Contact IHA Environmental Health at 867-2400 for support. A KSC-wide asbestos survey was performed and the data is compiled on the KSC Environmental Health Asbestos Survey Data Home Page (<http://amis>). If it is known that asbestos exists and will be disturbed, regulations from 62-257 F.A.C. must be followed. Notification to the NASA Environmental Program Branch (Doug Durham, TA-B1B, 867-8429) is required for any regulated asbestos removal in order that annual reporting requirements are fulfilled. If less than 260 linear feet, or less than 160 square feet of regulated asbestos containing material (RACM) is to be removed, there are no fee or reporting requirements to the FDEP, unless there is demolition of any load-supporting structural member. If the removal trips these thresholds, or is greater than 1 cubic meter, or 35 cubic feet, regulations require a notification to FDEP. The "Notice of Asbestos Renovation or Demolition" (FDEP Form Number 62-257.900(1)) can be found on the FDEP website under "Asbestos Notification" at: <http://www.dep.state.fl.us/air/forms.htm>. The Permitting and Compliance Group within TA-B1B Environmental Program Office must be copied on all reports submitted to FDEP. For asbestos disposal, IHA Waste Management can supply direction on proper handling, storage, and disposal though the Process Waste Questionnaire/Technical Response Package (PWQ/TRP) process. Please contact IHA Waste Management Services at 867-8642 for assistance.

**3.a.6. HAZARDOUS AND CONTROLLED WASTE (DEMOLITION OF FACILITIES/DEBRIS):** This project includes the demolition of a load-bearing structure (Bldg. 73020). All demolition activities that destroy the functionality of any load-supporting structural member of a facility, no matter of the size of the facility or the amount of material disturbed, must submit a "Notice of Asbestos Renovation or Demolition" (DEP Form Number 62-257.900(1)) to the Florida Department

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of Environmental Protection. NOTE: This form must be submitted regardless if Asbestos-Containing Material (ACM) is identified or not. The FDEP must be notified at least 10 days prior to any demolition activity. The NASA Environmental Program Office Permitting and Compliance Group (Doug Durham, TA-B1B, 867-8429) must be copied on all reports submitted to FDEP. Please contact Mr. Durham if clarification of this requirement is necessary. All hazardous and potentially hazardous items must be removed from the structure prior to demolition to prevent possible release of contaminants to the environment (i.e. fluorescent tubes, lighting ballasts, mercury containing devices (thermostats), Freon, abandoned waste collection drums, etc.).

Note: The stained/contaminated concrete and asphalt removed after demolition of the shed at M6-596 must be managed through the PWQ/TRP process as stated in item 3.a.2.

3.a.7. RECYCLING: The contractor must make every practical effort to reclaim and segregate materials that have the ability to be recycled. All reclaimed concrete must be segregated from other wastes and transported to the KSC Landfill (L7-0071) on Schwartz road. All reclaimed scrap metal, not being recycled by contractor outside of KSC, must be transported to the Reutilization, Recycling and Marketing Facility (RRMF) with a KSC Form 7-49. Please turn these items and the KSC Form 7-49 into RRMF personnel to ensure the proper disposition of the materials prior to leaving the recycling area. For any other information regarding what materials can be recycled or other general information regarding recycling policies at KSC, please contact the NASA Environmental Management Branch (Alice Smith, 867-8454 or Maggie Forbes, 867-3305).

Note: The 500 gallon tank at M6-596 should be emptied, cleaned and excessed through the RRMF.

3.a.8. EROSION AND SEDIMENT CONTROL BEST MANAGEMENT PRACTICES (BMPs): Precautions must be made to eliminate or reduce to the greatest extent possible any discharge of sediment outside established project boundaries. This can be accomplished by initiating a proactive erosion control BMP. Installation and maintenance of turbidity screens (silt fences) and/or floating turbidity booms must be completed prior to any initial land disturbance, and the screens must be maintained so they remain functional until such time that the newly exposed soils are stabilized with sod or natural vegetation.

3.a.9. THREATENED AND ENDANGERED SPECIES: This project has the potential to impact protected species including the Gopher tortoise. Measures must be taken to minimize impacts to the habitat. If indications of activity by any protected species are identified or burrows that cannot be avoided are encountered, the NASA Environmental Program Branch (EPB) should be notified to schedule relocation activities to remove the animal in question from harm. Please contact John Shaffer (TA-B1C, 867-8448) 10 working days prior to start of construction to determine whether a biological survey will be required.

3.b.1. DEWATERING: Dewatering effluent may be discharged to grade. Dewatering must be conducted in accordance with the "Noticed General Permit for Short Term Construction Dewatering" Permit #84324 issued by the St. Johns River Water Management District. At least three weeks prior to the beginning of dewatering, the initiating organization must submit the data described in Condition 10 of the permit to the NASA Environmental Assurance Branch (TA-B1B). If the dewatering will be 300,000 gallons per day or less and will not exceed 30 days duration, then the submittal of the data is not required, however, the dewatering activity must comply with all other conditions of the permit. All waters discharged to grade must not enter existing surface waters. Effluent must be discharged to a pervious surface to facilitate infiltration back into the ground. Contact Doug Durham (867-8429) for further assistance if required.

3.b.2. WATER RESOURCE PERMITTING (Potable Water/Domestic Wastewater): The proposed project will not require a permit for the alteration or abandonment of utilities used to transport potable water or domestic wastewater. Although no permitting is required, any work done will be per standards and criteria that would have been required had there been a permit issued by the Department and not jeopardize the health and safety of personnel due to effects of the modification on the KSC PW system (i.e. backflow preventers will be installed as required per KSC-STD-Z-0013 and standard engineering practice; disinfection and verification prior to use). The organization responsible for the work will ensure that best engineering practices, codes, specifications and standards are followed. Pressure and leak tests as well as disinfection are also required. Contact Doug Durham (867-8429) for further assistance if required.

3.b.3. NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT: This project may require an

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NPDES construction permit. If soil disturbance (removal of utilities/re-grading) cumulatively disturbs more than 1 acre of land - a National Pollution Discharge Elimination System (NPDES) Permit from the Florida Department of Environmental Protection (FDEP) is required. A condition of this permit is to provide a Stormwater Pollution Prevention Plan (SWPPP) detailing erosion and turbidity controls for the site. Information on completing the permit application and development of the SWPPP can be obtained by contacting Doug Durham, Environmental Assurance Branch (TA-B1B), at 867-8429.

3.b.4. STORMWATER MANAGEMENT SYSTEM: Fire Station #2 (K6-1198) has a permitted stormwater treatment system. If the amount of impervious surface is modified or if the stormwater management system is disturbed, notification should be provided to Doug Durham, Permitting and Compliance Group (TA-B1B, 867-8429).

3.b.5. EXCAVATION PERMIT: A KSC Excavation Permit will be required for any digging proposed by this project. Please contact Mission Support at 861-4453 for an underground utility scan.

No other environmental issues were identified based upon the information provided in the KSC 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 if the scope of the project (including the design) has changed since the original checklist was submitted.

cc: S. Stilwell/TA-B3D  
J. Junod/TA-B3A  
M. McDonnell/IHA-200

\*\*\*\*\* Approved 6/28/2007 7:39:14 AM, Manguikian, Kim \*\*\*\*\*

\*\*\*\*\* Deapproved 7/16/2007 9:01:37 AM, LPH \*\*\*\*\*

- 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

11/17/2008 2:37:37 PM

Date