National Aeronautics and Space Administration

Kennedy Space Center
Kennedy Space Center, FL 32899

August 20, 2018

Reply to Attn of: SI-E2

Kim Rush, Permitting Administrator
Florida Department of Environmental
Protection Central District Office
Compliance Assurance Program
3319 Maguire Boulevard, Suite 232
Orlando, FL 32803-3767

Subject: Request for Temporary Diesel Boiler Extension at the Orbiter Processing Facility (OPF) at the National Aeronautics and Space Administration, Kennedy Space Center (NASA KSC)

NASA KSC respectfully requests an additional extension of the 12-month criteria to accommodate a temporary diesel boiler at the OPF.

In October 2016, a temporary diesel boiler was deployed to the OPF to provide support during Hurricane Matthew. Though the temporary boiler was made operational, the facility did not sustain hurricane damage and the boiler was not required. However, the boiler was not immediately removed. In December 2016, an underground hot water line servicing the facility ruptured, and the boiler was turned on to provide hot water to the facility.

Throughout 2017, multiple attempts to isolate and repair the ruptured underground water line were unsuccessful. On June 14, 2017, NASA KSC requested a 12-month extension—in accordance with the Area Source Boiler NESHAP 40 CFR Part 63.11237—to allow this boiler to continue providing hot water to the impacted facility until the hot water line is repaired. On July 20, 2017, the extension was granted by the Florida Department of Environmental Protection. The plan to repair the hot water line was scrapped in favor of installing permanent natural gas boilers at each facility in the area. This project was scheduled to be completed by the end of Fiscal Year 2018, however, due to funding issues the project has yet to begin. It is now the intention of NASA KSC to complete the boiler replacement project by end of September 2019.

NASA KSC is requesting an additional 12-month extension to September 30, 2019—in accordance with the Area Source Boiler NESHAP 40 CFR Part 63.11237— to allow this temporary boiler to continue providing hot water until a permanent natural gas boiler is installed.

In February 2013, NASA KSC faced a similar situation when the same hot water line ruptured and two temporary boilers were deployed to service facilities in the same area. Those boilers were deployed to their respective locations for greater than 12 months, and in order to prevent a recurrence of exceeding 12 months at any one location NASA KSC implemented a temporary boiler/engine tracking system as part of the corrective action plan. The monitoring system alerted NASA KSC personnel once the current boiler had been in place for six months.

If you have any questions or concerns, please reach Robert Kline by phone at (321) 867-8415 or via e-mail at <robert.a.kline@nasa.gov>.

Robert Kline, PE
Lead, Permitting & Compliance