



Jeb Bush  
Governor

# Department of Environmental Protection

FILE

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

October 10, 2003

Ms. Denise R. DeLaPascua  
NASA- Kennedy Space Center Facility  
NASA Environmental Program Branch  
Attn: TA-C3/ Denise DeLaPascua  
Kennedy Space Center, FL 32899

Re: Final National Emission Standards for Hazardous Air Pollutants (NESHAP) - Site Remediation

Dear Ms. DeLaPascua:

The 112(j) notification that was submitted last year for the NASA-KSC Facility indicated that KSC may be subject to the NESHAP (40 CFR 63 Subpart GGGGG) for Site Remediation. You may be interested in knowing that the USEPA published the **final** NESHAP regulation for this source category in the Federal Register on October 8, 2003. Therefore, 112(j) requirements no longer apply to site remediation activities.

If you are interested in reading the final standards, the NESHAP and a Fact Sheet explaining the standards may be accessed through the USEPA website at <http://www.epa.gov/ttn/atw/siterm/sitermpg.html>. If you do not have access to the Internet, and would like to receive a paper copy of the final standards in the mail, please contact Mr. Bobby Bull at (850) 921-9585 or [Robert.Bull@dep.state.fl.us](mailto:Robert.Bull@dep.state.fl.us).

"Existing" affected sources must be in compliance with Subpart GGGGG standards by October 9, 2006. For the purposes of Subpart GGGGG, affected sources are "existing" if construction or reconstruction of the affected source commenced before July 30, 2002. For compliance dates for "new" affected sources, please refer to section 63.7883 of the standards.

Since it was also indicated in the 112(j) notification that NASA-KSC may be subject to Subpart ZZZZ-Reciprocating Internal Combustion Engines, and Subpart DDDDD-I/C/I Boilers and Process Heaters, you may still be required to submit a 112(j) MACT Title V permit revision application by April 28, 2004 unless these proposed subparts are final by then.

Though they have not yet been published in the federal register, the final standards for the following MACTs have also been signed and 112(j) requirements also no longer apply to these source categories:

- Subpart MMMM-Surface Coating of Misc. Metal Parts and Products (NASA is exempted);
- Subpart PPPP-Surface Coating of Plastic Parts and Products (NASA is exempted); and
- Subpart EEEE – Organic Liquids Distribution.

If you have any questions concerning this information, please contact me at (850)921-9534 or [Cindy.Phillips@dep.state.fl.us](mailto:Cindy.Phillips@dep.state.fl.us).

Sincerely,

Cindy L. Phillips, P.E., Bureau of Air Regulation

c: Len Kozlov, FDEP, Central District Office

"More Protection, Less Process"

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## Memorandum

**To:** Cindy Phillips, FDEP  
**From:** Daniel J. Rembert

**Date:** October 17, 2002  
**File No.:** 0791A

**Subject:** NASA Comments Sent to the EPA on the MMPP NESHAP

As you requested, you will find enclosed a copy of the NASA consolidated comments that were submitted to the EPA. These particular comments were for the Miscellaneous Metal Parts and Products (MMPP) National Emission Standards for Hazardous Air Pollutants (NESHAP).

Once again KSC and the rest of the Air Partnering Group would like to thank you for taking the time to answer our questions and describe the Part 2 MACT Hammer process in more detail. If you have any questions or need any more information, please call me at (321) 867-8428.



Daniel J. Rembert  
Air Quality Specialist  
Environmental Program Branch

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OCT 21 2002

BUREAU OF AIR REGULATION

enclosures

National Aeronautics and  
Space Administration  
**Headquarters**  
Washington, DC 20546-0001



October 11, 2002 02 OCT 17 11:50

Reply to Attn of: JE

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OCT 21 2002

BUREAU OF AIR REGULATION

Air and Radiation Docket and Information Center (6102)  
Attention Docket Number A-97-34  
U.S.EPA  
1200 Pennsylvania Avenue, NW  
Washington DC 20460

Subject: National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products; Proposed Rule 63 FR 52780 (August 13, 2002)

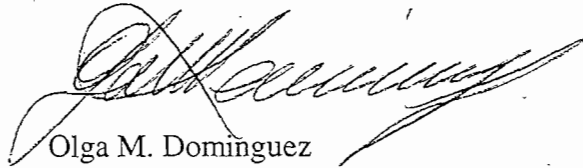
The National Aeronautics and Space Administration (NASA) appreciates the opportunity to review and comment to the Environmental Protection Agency (EPA) on the referenced National Emission Standard for Hazardous Air Pollutants. NASA is concerned about the potential impact of this NESHAP on large flight support equipment at NASA facilities.

Space flight operations require a considerable amount of unique equipment. This equipment can be quite large and require significant coating materials. For instance, the launch support equipment, such as the launch pads, mobile launcher platform (MLP) and crawler/transporter, are designed specifically for the space shuttle program. The protective coatings applied to the launch structures, facilities, and ground support equipment varies depending on the type of exposure. One piece of equipment may require several different types of coatings. For instance, parts of the MLP that receive rocket engine exhaust impingement receive one type of coating while surfaces that receive acid deposition from solid rocket booster exhaust products receive another type of coating. These coating materials singularly or in combination provide unique performance capabilities. These coatings include all coating components that have been qualified, or must be compatible with components that are qualified, by NASA under a NASA specification, standard or equivalent as providing unique performance capabilities. NASA requests an exemption from subpart M MMM for launch support equipment.

NASA understands that EPA is considering issuing a separate NESHAP for miscellaneous military surface coating operations rather than to include the requirements within the Miscellaneous Metal Parts and Products (MMPP) or Plastic Parts and Products (PPP) rules. The military's unique concerns are similar to the NASA unique concerns enumerated above. Should EPA decide to proceed with a separate NESHAP for miscellaneous military surface coating operations and EPA denies our request for exemption from subpart M MMM, we request that NASA be included in the miscellaneous military surface coating operations NESHAP.

If NASA can be of further assistance, please contact Mr. Ken Kumor at (202) 358 -1112 or e-mail <[kkumor@hq.nasa.gov](mailto:kkumor@hq.nasa.gov)>.

Cordially,



Olga M. Dominguez  
Director  
Environmental Management Division

cc:

USEPA/C539-03/Ms. Kim Teal  
JE/Ms. Bayon  
JE/Mr. Kumor  
KSC/TA-C3/Ms. De La Pascua  
MSFC/ED30/Dr. Munafo  
MSFC/ED36/Ms. Clark-Ingram  
MSFC/ED36/Ms. Lash.

National Aeronautics and  
Space Administration  
**John F. Kennedy Space Center**  
Kennedy Space Center, FL 32899

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MAY 16 2002



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Reply to Attn of: TA-C3/0791A

May 14, 2002

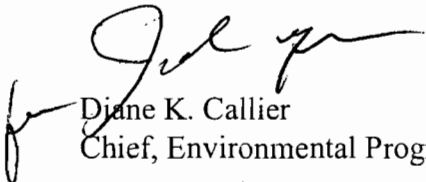
Ms. Cindy Phillips, P.E.  
FDEP Bureau of Air Regulation  
MS 5505  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**Subject: 112(j) Part 1 Notification Submittal for a Maximum Achievable Control Technology (MACT) Determination**

The National Aeronautics and Space Administration (NASA) Kennedy Space Center (KSC) facility has received and reviewed the letter requesting information to meet the requirements of Section 112(j) of the Clean Air Act (CAA), as amended in 1990. This letter and enclosed information tables represents the KSC Part 1 Notification Submittal for a Maximum Achievable Control Technology (MACT) Determination required under 40 CFR 63.52 for stationary sources located on facilities that are major sources of hazardous air pollutants (HAP) for which the United States Environmental Protection Agency (US EPA) failed to finalize a MACT Standard by May 15, 2002. This letter is also to inform the Florida Department of Environmental Protection (FDEP) and the US EPA that NASA/KSC is a major source of HAPs and is required to submit this notification.

If you have any questions, please address them to:

NASA Environmental Program Branch  
Attn: TA-C3/Denise R. DeLaPascua  
Kennedy Space Center, FL 32899  
Telephone Number: (321) 867-1599  
e-mail: denise.delapascua-1@ksc.nasa.gov

  
Diane K. Callier  
Chief, Environmental Program Branch

Enclosures

cc: US EPA-Region IV/Doug Neeley  
FDEP-CD/Leonard Kozlov  
FDEP-CD/Alan Zahm  
NASA HQ-JE/Maria Bayon  
NASA MSFC-ED36/Marceia Clark-Ingram

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MAY 16 2002

Part 1 Notification Submittal  
Sources Subject to Section 112(j) Provisions  
40 CFR 63.50 through 63.56

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Source Identification	
1) Source Name NASA/Kennedy Space Center Facility	
2) Source ID No. 0090051-006-AV	
Physical Location	
3) Street Address Environmental Program Branch, Mail Code: TA-C3	
4) City Kennedy Space Center	5) County Brevard
6) State Florida	7) Zip Code 32899
Mailing Address (if different than physical location)	
8) Address Same as above	
9) City	10) County
11) State	12) Zip Code

Applicability Determination	
13) Is your facility a major source of hazardous air pollutants (HAP)? If not, you need not complete the rest of this form.  <i>A major source is any contiguous area under common control that emits or has the potential to emit considering controls, in the aggregate, at least 10 tons per year of any single HAP or 25 tons per year total HAP.</i>	<input checked="" type="checkbox"/> YES  <input type="checkbox"/> NO
14) Do you own or operate an affected source in a source category for which EPA has not promulgated standards under 40 CFR 63? If so, which one(s)? <u>Industrial, Commercial and Institutional Boilers and Indirect-fired Process Heaters</u> <u>Miscellaneous Metal Parts and Products (Surface Coating)</u>	<input checked="" type="checkbox"/> YES  <input type="checkbox"/> NO

4/20/04  
10/30/03

10/27/03  
 10/31/03  
 4/28/04  
 10/29/03  
 \*

<p><u>Organic Liquids Distribution (non-gasoline)</u>  <u>Paint Stripping Operations</u>  <u>Plastic Parts (Surface Coating)</u>  <u>Reciprocating Internal Combustion Engines (RICE)</u>  <u>Site Remediation</u>  <u>Large Appliance (Surface Coating)</u></p> <p>If not, you need not complete the rest of this form.  <i>(See Table of Promulgated Regulations, Table of Proposed Regulations, and Table of Upcoming Regulations at <a href="http://www.epa.gov/ttn/atw/eparules.html">www.epa.gov/ttn/atw/eparules.html</a> to determine if your standard has not been promulgated.)</i></p>	
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15) Provide a brief description of the major source and its activities:

KSC encompasses nearly 56,660 hectares (140,000 acres) on the east coast of central Florida and is bordered on the west by the Indian River Lagoon, on the southeast by the Banana River, and on the north by the Mosquito Lagoon. The Center itself is situated approximately 242 km (150 miles) south of Jacksonville and 64 km (40 mi.) due east of Orlando on the north end of Merritt Island adjacent to Cape Canaveral Air Force Station (CCAFS) at Longitude 80° 42' West and Latitude 28° 38' North. KSC is the primary launch site for NASA's Space Shuttles with two active launch pads and is the primary eastern U.S. landing site for Space Shuttle flights. In addition to supporting the nation's space mission operations, KSC contains within its boundaries the Merritt Island National Wildlife Refuge (MINWR) and the Canaveral National Seashore (CNS), which are managed by the U.S. Fish and Wildlife Service (USFWS) and the National Park Service (NPS), respectively. This unique relationship between space flight and preservation of the environment is carefully managed to ensure that both objectives are pursued without conflicting with one another.

16) Provide a brief description of the affected source(s) in the relevant source category(ies):

- **Industrial, Commercial and Institutional Boilers and Indirect-fired Process Heaters**

EU 001, IM-B-002-A, B, and C, Vehicle Assembly Building (VAB) Utility Annex Hot Water Generators (3).  
 EU 002, IM-B-001-A, B, and C, Central Heat Plant Hot Water Generators (3).  
 EU 013, SK-B-001-A and B, SRB-ARF Hot Water Generators (2).  
 EU 051, SK-B-002, Parachute Refurbishment Facility Hot Water Generator.  
 EU 058, IM-B-006-A, B, and C, Relocatable Hot Water Generators (3).  
 EU 077, IM-B-004-A, B, C, D and E, Hangers AE, M Annex, S Main, S South, and L Hot Water Generators (5).

Insignificant Emissions Units and/or Activities:

CM-36, Vertical Processing Facility Hot Water Generator.  
 CM-37, Space Station Processing Facility Hot Water Generators (2).  
 CM-38, Multi-Payload Processing Facility Hot Water Generator.  
 CM-41, Payload Servicing Facility Hot Water Generator.  
 IM-20, Emergency Power Station/K6-1091, Hot Water Heater #1,2,3,4,5.

*Note: EU is the Title V Operating Permit Emission Unit number.*

IM-23, MFF/K6-1145, Ovens/Convection Cookers (6).  
IM-24, MFF/K6-1145, Natural Gas Fired Hot Water Heaters (2).  
IM-25, Equip Shelter/K6-145A, Propane Fired Hot Water Heaters (2).  
IM-26, FireStation/K6-1198, Propane Space Heater.  
IM-27, Generator Shop/K6-1446, Propane Space Heater.  
IM-41, HQ/M6-399, Ovens/Convection Cookers (5).  
IM-52, O&C/M7-355, Ovens/Convection Cookers (2).  
IM-63, Heat Plant/M7-1112, Hot Water Generator.  
IM-64, M&O/M6-486, Hot Water Generator.  
IM-58, SLF/J6-2313, Jet Engine Compressors.  
MILA-02, Operations Building Hot Water Generator.  
TM-33, Propane Heater, Building #8.  
TM-59, Gas Space Heaters (3).  
TM-108, Hot Water Generators #1,2.  
TM-109, Hot Water Generator.

- **Miscellaneous Metal Parts and Products (Surface Coating)**

*Some of the following listed emission units, sources, processes, or activities in the Miscellaneous Metal Parts and Products category are for space flight-related hardware only, which is expected to be exempt in the final promulgated rule. Therefore, in the final determination, these emission units, sources, processes, or activities will not be included.*

EU 042, SK-P-006, Hanger AF East and West Paint Booths.

EU 064, TM-P-002, Surface Coating Fume Hood.

EU 066, TM-P-003, Surface Coating Fume Hood.

EU 069, IM-P-001, Two Drive Through Paint Booths, Corrosion Control Facility.

EU 071, IM-P-002, Base Support Building (M6-486) Spray Booth.

EU 083, SK-P-001, Top Coat Application Cell, SRB-ARF.

EU 084, SK-P-004-A, TPS Spray Cells No. 1 and 2, SRB-ARF.

EU 085, SK-P-004-B, TPS Cure Cells No. 1 and 2, SRB-ARF.

Surface Coating Operations at the following specific locations and/or activities: SRB Range Safety Antenna Cover, Top of the Mobile Launch Platform (MLP), Multiple Levels Fixed Surface Structure (FSS), MLP Access Towers, Weather Protection, 9099 Interface, Swing Arm, Pipe Bridge, Hammerhead Crane, Various Areas of FSS, Cooling Towers, Diesel Exhaust Stacks, Launch Pad Surfaces, Sound Suppression System, Water Tower, Substations, LH2 and LOx Tanks, VAB, Industrial Areas, Major Outdoor Air Conditioning Units, Indoor Non-Air Conditioned Environments, and Continuous Indoor Air Conditioned Environments all considered Fugitive Emissions (EU 081, KSC-FUG-001).

Various brush, rolling, and aerosol touch-up painting and corrosion prevention and control Surface Coating at unspecified locations and/or activities across the Center all considered Fugitive Emissions (EU 081, KSC-FUG-001).

Insignificant Emissions Units and/or Activities:

DE-05, Payload Support Building Surface Coating Operation.

*Note: EU is the Title V Operating Permit Emission Unit number.*



EU 069, IM-P-001, Two Drive Through Paint Booths, Corrosion Control Facility.

EU 071, IM-P-002, Base Support Building (M6-486) Spray Booth.

Paint Stripping Operations used on welds in the field to remove paint for inspections considered Fugitive Emissions (EU 081, KSC-FUG-001).

Various Paint Stripping Operations at unspecified locations and/or activities across the Center all considered Fugitive Emissions (EU 081, KSC-FUG-001).

- **Plastic Parts (Surface Coating)**

EU 071, IM-P-002, Base Support Building (M6-486) Spray Booth.

Various brush, rolling, and aerosol touch-up painting and corrosion prevention and control Surface Coating at unspecified locations and/or activities across the Center all considered Fugitive Emissions (EU 081, KSC-FUG-001).

- **Reciprocating Internal Combustion Engines (RICE)**

EU 086, KSC-DE-001, KSC Diesel Fired Units (Center-wide relocatable units).

EU 087, KSC-GE-001, KSC Gasoline Fired Units (Center-wide relocatable units).

EU 088, IM-G-001, LC39 Emergency Power Plant.

Insignificant Emissions Units and/or Activities:

CM-24, Mobile Transporter Relocatable Diesel Generators (5).

- **Site Remediation**

KSC has many remediation sites that are dynamic and continuously changing status from investigation to cleaned-up and closed. Of the sites, there are many that have HAP-contaminated groundwater and soil, and excavation and dewatering are utilized for extraction. Both on-site and off-site removal and treatment of contamination takes place. On-site treatment includes air stripping, soil vapor extraction, air sparging, bioventing, and low temperature desorption.

- **Large Appliance (Surface Coating)**

EU 069, IM-P-001, Two Drive Through Paint Booths, Corrosion Control Facility.

Various brush, rolling, and aerosol touch-up painting and corrosion prevention and control Surface Coating at unspecified locations and/or activities across the Center all considered Fugitive Emissions (EU 081, KSC-FUG-001).

17) Identify any sources that have MACT determinations under section 112(g):

KSC currently has no sources, processes, or activities that are affected by section 112(g).

*Note: EU is the Title V Operating Permit Emission Unit number.*

IM-011, Generator Shop/K6-1446, Surface coating small parts.  
IM-021, Fuel Storage Area #1, Surface coating small parts.  
IM-036, Converter Compressor Facility/K7-468, Surface coating small parts.  
IM-037, Propellant Lab/K7-516, Surface coating small parts.  
IM-038, K-Bottle Storage/K7-614, Surface coating small parts.  
SK-16, Touch-up Fume Hood.  
SK-19, Insta-Foam Vent.  
SK-43, Ground Support Equipment (GSE) Paint Booth.  
SK-46, Small Parts Spray Cell.  
SK-48, Conformal Coating.  
SK-50, Small Parts Paint Booth  
SK-51, GSE Paint Booth.  
TM-22, SMRD Lab.  
TM-27, Room #6 Vent Hood.  
TM-28, Fume Hood.  
TM-29, Hold Down Post Refurbishment.  
TM-30, Painting Booth.  
TM-38, Fume Hood.  
TM-45, DMES Fume Hood.  
TM-48, ET/SRB QE Lab Hood.  
TM-52, High-Bay Operations (DMES).  
TM-100, GSE Workshop Fume Hoods (2).  
TM-103, Spray/Cure Cell No. 5.  
TMR-02, Paint Booth #1.

- **Organic Liquids Distribution (non-gasoline)**

KSC has storage tanks, process vents, and process equipment (pumps, valves, connectors, etc.) associated with the on-site only distribution and transfer of fuels. Organic Liquids utilized, as fuels at KSC are Diesel Fuel Oil, Natural Gas, JP-8, Hydrazine, and Methyl Hydrazine. All fuels at KSC are distributed on-site directly to users for use as fuels, and as such are not considered Organic Liquids in this category.

- **Paint Stripping Operations**

The definition of this category is as follows: Paint Stripping Operations (formerly Paint Stripper Users) - includes any facility engaged in commercial or industrial paint stripping. Since paint stripping is regulated within other rules, EPA does not believe that the Section 112(j) provisions apply to this source category. EPA will state in the preamble to the Miscellaneous Metal Parts and Products proposed rule that "*Our data gathering and analyses led us to conclude that there are no stand-alone major sources of paint stripping that aren't already (or will be) regulated by other rules and thus we won't promulgate a NESHAP... In the near future we will begin work to consider area sources of paint stripping for regulation under section 112(k) and at the same time we will revisit the question of whether there are any unregulated major sources.*"

*Note: EU is the Title V Operating Permit Emission Unit number.*

**Certification and Signature of Responsible Official**

18) I certify that the information contained in this application to be accurate and true to the best of my knowledge:

Responsible Official:

  
\_\_\_\_\_  
Signature

Chief, Environmental Program Branch  
\_\_\_\_\_  
Title

Diane K. Callier  
\_\_\_\_\_  
Printed name of Signatory

May 14, 2002  
\_\_\_\_\_  
Date

*A responsible official can be:*

- *The president, vice president, secretary, or treasurer of a corporation that owns the facility or a duly authorized representative that is responsible for the overall operation of the facility.*
- *An owner of the facility.*
- *A principal executive officer if the facility is owned by the federal, state, city or county government.*
- *A ranking military officer if the facility is located at a military base.*
- *A general partner of a partnership that owns the facility.*

*Note: EU is the Title V Operating Permit Emission Unit number.*

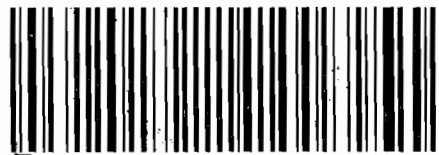
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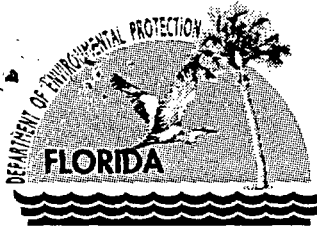
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H METER 558019

Ms. Cindy Phillips, P.E.  
FDEP Bureau of Air Regulation, MS 5505  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

32399+2400 01





Jeb Bush  
Governor

# Department of Environmental Protection

Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

David B. Struhs  
Secretary

May 17, 2002

Ms. Diane K. Callier  
Chief, Environmental Program Branch  
NASA  
John F. Kennedy Space Center  
Kennedy Space Center, FL 32899

Re: 112(j) Notification Information Submittal

Dear Ms. Callier:

Thank you for submitting the referenced information in your letter dated May 14, 2002. Your information submittal appears to meet our current 112(j) requirements.

Please be aware that, although your Part I Notification Submittal item #18 refers to this information submittal as an "application," the Department does not recognize your submittal as a state permit application and has no plans to process it as such.

No further 112(j) information is needed from you at this time.

If you have any questions, please call me at 850/921-9534.

Sincerely,

Cindy L. Phillips, P.E.  
Bureau of Air Regulation

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