UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

NOV 13 2012

UNITED PARCEL SERVICE
EMAIL VERIFICATION REQUESTED

Mr. James E. Hattaway
Associated Director
National Aeronautics and Space Administration
Mail Code: AA
Kennedy Space Center, Florida 32899

Dear Mr. Hattaway:

The purpose of this letter is to request information as part of a U.S. Environmental Protection Agency investigation to determine the compliance status of the National Aeronautics and Space Administration's (NASA) facility located in Kennedy Space Center, Florida, with the Clean Air Act (CAA), 42 U.S.C. § 7401, *et seq*, and NASA's Title V Air Operation Permit (permit #0090051-018-AV).

Section 114(a) of the CAA, 42 U.S.C. § 7414(a), authorizes the Administrator of the EPA to require any person who owns or operates an emission source, whom the Administrator believes may have information necessary for the purposes of Section 114(a), or who is subject to any requirement of the CAA, to provide such information as the Administrator may reasonably require for the purpose of carrying out any provision of the CAA. This authority has been duly delegated to the Director of the Air, Pesticides, and Toxics Management Division, Region 4.

Therefore, pursuant to Section 114(a) of the CAA, NASA is directed to respond to the enclosed Information Request **within 30 (thirty) days** of your receipt of this letter (Enclosure A). Instructions and definitions are provided in Enclosure A to assist you in responding to this Information Request as completely as possible. The response must be delivered to the EPA or postmarked no later than the above deadline. Send one complete copy of your response, including supporting documentation, to the following address:

Ms. Lornette Harvey
Air and EPCRA Enforcement Branch
South Air Enforcement Section
U.S. EPA, Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303

All information submitted pursuant to this information request must be accompanied by the Statement of Certification which is provided in Enclosure B. A responsible official with sufficient knowledge and authority must certify that all information submitted in response to this request is true, accurate, and complete. Also, please submit a copy of your response to the Florida Department of Environmental Protection (FDEP), Central District Office, the agency that issued NASA's Title V permit.

Failure to fully respond or provide the information required may result in the issuance of an Order requiring compliance with the requirements contained herein or the initiation of an enforcement action pursuant to Section 113 of the CAA, 42 U.S.C. § 7413. This may include civil and/or administrative penalties of up to $37,500 per day of noncompliance, pursuant to Sections 113(b) and (d) of the CAA, 42 U.S.C. § 7413(b) and (d).

You are entitled to assert a claim of business confidentiality covering all or part of any required information in the manner described at 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth at 40 C.F.R. Part 2, Subpart B. Unless a confidentiality claim is asserted at the time the required information is provided, the EPA may make this information available to the public without further notice to you. Notwithstanding the above, the information you provide may be used by the EPA in administrative, civil, and criminal proceedings.

This request is exempt from the requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 *et seq.*, because it seeks the collection of information by an agency from specific individuals or entities as part of an administrative action or investigation.

The EPA recognizes that this request for information is lengthy and would be pleased to work with you and hear any suggestions you may have regarding how to provide the EPA with the information it needs to fully evaluate these issues with minimal disruption of your normal activities. If you have any questions relating to this Information Request, you may consult with the EPA prior to the time specified above. Questions should be directed to Ms. Lornette Harvey at (404) 562-8386 or by electronic mail at harvey.lornette@epa.gov.

Thank you for your cooperation in this matter.

Sincerely,

Carol L. Kemker for

Beverly H. Banister
Director
Air, Pesticides, and Toxics
Management Division

Enclosures

cc: Jeff Littlejohn (w/enclosures), FDEP
Brian Accardo (w/enclosures), FDEP
Jeff Koerner (w/enclosures), FDEP
Caroline Shine, (w/enclosures), FDEP, Central District Office

ENCLOSURE A
INFORMATION REQUEST

A. INSTRUCTIONS

1. Please provide a separate narrative response to each question and subpart of a question set forth in this Information Request and precede each answer with the number of the question to which it corresponds.

2. If requested information or documents are not known or are not available to you at the time of your response to this Information Request, but later known or available to you, you must supplement your response to EPA. Moreover, should you find at any time after submission of your response that any portion is or becomes false, incomplete, or misrepresents the facts, you must provide EPA with a corrected response as soon as possible.

3. Requested information can be submitted in electronic form if applicable.

4. Where specific information has not been memorialized in a document, but is nonetheless responsive to a Request, you must respond to the Request with a written response.

5. The information requested herein must be provided even though NASA may contend that it includes possible confidential business information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested, pursuant to Section 114(c) of the CAA, 42 U.S.C. § 7414(c), and 40 C.F.R. § 2.203(b), by attaching to such information at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret", or "proprietary," or "company confidential." Information covered by such a claim will be disclosed by EPA only to the extent, and only by means, of the procedures set forth in the statue and regulation identified above. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such as claim.

B. DEFINITIONS

1. "Act" means the Clean Air Act, as amended, 42 U.S.C. § 7401, *et seq.*

2. "Document" means written documentation of any kind, including documentation solely in electronic form. It includes any document in the possession or control of National Aeronautics and Space Administration (NASA), or the possession or control of any person or entity hired by NASA. A copy of a document rather than the original may be provided.

3. The term "person" or "persons", shall have the meaning set forth in Section 302(e) of the Act, 42 U.S.C. § 7602(e), and includes an individual, corporation, partnership, association, State, municipality, political subdivision of a State, and any agency, department, or instrumentality of the United States and any officer, agent or employee thereof.

4. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

5. "NASA" means the National Aeronautics and Space Administration located at Kennedy Space Center, Florida, 32899.

6. "Facility" means the entire manufacturing facility (including all physical structures, contractors, subcontractors, operations, and processes under NASA's control) located at Kennedy Space Center, Florida, 32899.

7. "Aerospace vehicle or components" means any fabricated part, processed part assembly of parts, or completed unit, with the exception of electronic components, of any aircraft including but not limited to airplanes, helicopters, missiles, rockets, and space vehicles.

8. "Criteria pollutants" means Particulate Matter (PM), Carbon Monoxide (CO), Nitrogen Oxides (NOx), Sulfur Dioxide (SO2), and Lead (Pb).

9. "Coating" means a material that is applied to the surface of an aerospace vehicle or component to form a decorative, protective, or functional solid film, or the solid film itself.

10. "Construction" means the on-site fabrication, erection, installation of an affected source. Construction does not include the removal of all equipment comprising an affected source from an existing location and reinstallation of such equipment at a new location. The owner or operator of an existing affected source that is relocated may elect not to reinstall minor ancillary equipment including, but not limited to, piping, ductwork, and valves. However, removal and reinstallation of an affected source will be construed as reconstruction if it satisfies the criteria for reconstruction as defined in this section. The costs of replacing minor ancillary equipment must be considered in determining whether the existing affected source is reconstructed.

11. "Depainting" means the removal of a permanent coating from the outer surface of an aerospace vehicle or component, whether by chemical or non-chemical means. For non-chemical means, this definition excludes hand and mechanical sanding, and any other non-chemical removal processes that do not involve blast media or other mechanisms that would result in air borne particle movement at high velocity.

12. "Depainting operation" means the use of a chemical agent, media blasting, or any other technique to remove permanent coatings from the outer surface of an aerospace vehicle or components. The depainting operation includes washing of the aerospace vehicle or component to remove residual stripper, media, or coating residue.

13. "Emission unit" means any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant or any pollutant listed under Section 112(b) of the Act. This term is not meant to alter or affect the definition of the term "unit" for purposes of title IV of the Act.

14. "Engine Test Cell/Stand" means any apparatus used for testing uninstalled stationary or uninstalled mobile (motive) engines.

15. "Facility" means the entire manufacturing facility (including all physical structures and processes operated by subcontractors) located at the Kennedy Space Center, Florida.

16. "Heat input" means heat derived from combustion of fuel in a steam generating unit and does not include the heat derived from preheated combustion air, recirculated flue gases, or exhaust gases from other sources (such as stationary gas turbines, internal combustion engines, and kilns).

17. "Maximum design heat input capacity" means the ability of a steam generating unit to combust

18. "HAPs" means hazardous air pollutants, any air pollutant listed in or pursuant to Section 112(b) of the Act.

19. "Potential to Emit" means the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by the Administrator. This term does not alter or affect the use of this term for any other purposes under the Act, or the term "capacity factor" as used in title IV of the Act or the regulations promulgated thereunder.

20. "Reconstruction", unless otherwise defined in a relevant standard, means the replacement of compounds of an affected or a previously nonaffected source to such an extent that: (1) The fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new source; and (2) It is technologically and economically feasible for the reconstruction source to meet the relevant standard(s) established by the Administrator (or a State) pursuant to section 112 of the Act. Upon reconstruction, an affected source, or a stationary source that becomes an affected source, is subject to relevant standards for new sources, including compliance dates, irrespective of any change in emissions of hazardous air pollutants from that source.

21. "Space vehicle" means a man-made device, either manned or unmanned, designed for operation beyond earth's atmosphere. This definition includes integral equipment such as models, mock-ups, prototypes, molds, jigs, tooling, hardware jackets, and test coupons. Also included is auxiliary equipment associated with test, transport, and storage, which through contamination can compromise the space vehicle performance.

22. "VOC" means volatile organic compounds, any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions.

23. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in the Clean Air Act or 40 C.F.R. in which case the statutory or regulatory definitions shall apply.

C. INFORMATION REQUEST

1. Provide a copy of NASA's most recent State of Florida issued Title V operating permit.

2. Provide a copy of NASA's most recent Title V permit application and any construction permits for new, reconstructed, or existing air emission sources since start up of the facility.

3. Provide a site map identifying NASA's property boundary and include the location of all contractors and subcontractors located on the property with processes that have the potential to emit HAPs.

4. Provide a list of all contractors and subcontractors located on NASA's property conducting processes or operations with the potential to emit HAPs.

5. Provide a list of all applicable North American Industry Classification System (NAICS) codes and Standard Industrial Classification (SIC) codes for processes conducted at NASA's facility either by NASA or their contractors and subcontractors.

6. Provide a process flow diagram showing all of the facility's operations and processes, and the air emission units including any air emission control devices. If processes are performed by contractors and subcontractors, please indicate the name and location of each contractor and subcontractor.

7. Provide a list of all the air emission units at the facility including a detailed description of each process associated with the air emission units and indicate which ones emit or have the potential to emit:

    a. VOCs and/or HAPs; and
    b. Criteria pollutants.

8. Provide documents that indicate the date (day, month and year) that construction commenced and/or the operation startup date for each air emission unit listed in #7 above.

9. For each process associated with the air emission units listed in #7 above, please provide:

    a. A list of raw materials used in the process;
    b. The quantity of raw materials (in pounds or gallons) used each month;
    c. A copy of the purchase records for all HAP and VOC containing raw materials;
    d. The quantity and description of finished product manufactured from the process; and
    e. For each raw material listed, the material safety data sheets (MSDS), formulation data (provided by the manufacturer), or test data used to determine the VOC, HAP, or criteria pollutant content.

10. Provide the facility's HAP, VOC and criteria pollutant potential to emit (PTE) air emission rate (in tons per year), and include the calculations and methods used to determine the PTE.

11. Provide a list of all types of aerospace vehicles or components and any type of space vehicles, non-aerospace vehicles, satellites, rockets, aircrafts, and any other equipment that are manufactured, constructed, reconstructed, reworked, or otherwise processed at the facility. Include the following information with the list:

    a. The initial start date (month, day, year) of the process;
    b. The amount of items processed each year;
    c. A description of each process from start (receipt of the item) to finish (process completion);
    d. A list of raw materials used in the process; and
    e. The estimated amount of raw materials used in the each process.

12. For each raw material used in the processes at the facility, please indicate whether the material is:
    a. A coating, thinner and/or other additive;
    b. A cleaning material;
    c. An adhesive material or coating;
    d. An abrasive blasting material; or
    e. Any other way that may create a VOC, HAP, or Criteria Pollutant emission.

13. For all steam generating units (hot water generators/boilers), please provide the following information:

    a. The date (month, day, year) the unit was constructed and/or installed;
    b. Each date (month, day, year) the unit was reconstructed;
    c. The annual operating schedule for each unit (including copies of operating records maintained for the previous 5 years to present);

d. The maximum design heat input capacity for each unit (include a copy of the unit's engineering specification and engine certification);
e. Monitoring records maintained for each unit for the previous 5 years to present;
f. The type of fuels used in the units (including copies of fuel usage records maintained for the previous 5 years to present);
g. Copies of the initial emission performance tests and any performance test performed within the last 5 years for each unit; and
h. The maintenance records for each unit for the previous 5 years to present.

14. For all compression ignition and spark ignition stationary internal combustion engines, please provide the following information:

    a. The date (month, day, year) the engine was construction and/or installed;
    b. Each date (month, day, year) the engine was reconstructed, including a description of the reconstruction;
    c. The maximum engine power for each engine (including a copy of engineering specifications and certification for each);
    d. The type of fuels used in the engines (including fuel usage records maintained for the previous 5 years to present);
    e. The annual operating schedule for each engine (including copies of operating records maintained for the previous 5 years to present);
    f. Copies of monitoring records maintained for each engine for the previous 5 years to present; and
    g. The maintenance and repair records for each engine for the previous 5 years to present.

15. For all process ovens, kilns, blast furnaces, and other drying and heating equipment used in processes at the facility, please provide the following information:

    a. A description of oven, kiln, blast furnace, or other drying/heating equipment;
    b. A copy of the engineering specifications;
    c. The installation date;
    d. Each reconstruction date;
    e. The process description used with each oven, kiln, blast furnace or drying/heating equipment;
    f. A list of raw materials used in the process;
    g. Hours of operation (including copies of any logs maintained for previous 5 years to present);
    h. Copies of monitoring records (such as temperature readings, gas flow amounts, and pressure measurements) maintained for the previous 5 years to present; and
    i. Maintenance and repair records maintained for previous 5 years to present.

16. For each abrasive blasting medium, provide the following information since startup of operation:

a. The date (including month, day and year) the material was first used in the process;
b. The amount of abrasive blasting medium consumed on a monthly basis and in each consecutive 12-month period (for the previous 5 years to present);
c. The amount of abrasive blasting hours on a monthly basis and in each consecutive 12-month period (for the previous 5 years to present);
d. The amount of welding electrodes and/or medium consumed on a monthly basis and in each consecutive 12-month period (for the previous 5 years to present);
e. The total PM and PM10 emission rate in tons per month and tons per year for each consecutive 12-month period for the last 5 years; and
f. The method used to determine the requested information for question #16a through #16f above and including a copy of the documentation to substantiate NASA's response.

17. For each engine test cell/stand used at the facility, please provide the following information:

a. The installation and/or startup date (month, day, and year) of each unit;
b. Each reconstruction or modification date of each unit;
c. The type of engines (including horsepower rating) for testing the test cell/stand;
d. A description of any continuous parameter monitoring system (CPMS) or continuous emission monitoring system (CEMS) used with the each unit;
e. A copy of any monitoring or testing records maintained for each unit for the previous 5 years to present; and
f. A description of any control device used to control the air emissions from the engine test cell/stand and the destruction efficiency (DE) of the device.

18. For each depainting operation conducted at the facility, please provide the following information:

a. The number of depainting operations conducted at the facility within the last 5 years;
b. The initial startup date (month, day, year) of each operation;
c. How many aerospace vehicles are processed annually in the operation within last 5 years;
d. A list of raw materials used in the operations (include MSDSs); and
e. A description of any control devices that are used to control air emissions from each operation.

19. Provide copies of actual air emission rate for the entire facility for the previous 5 years to present which includes:

a. The annual emission rate (tons per year) for criteria pollutants (PM, SO2, NOx, CO and Pb) including the calculations used to determine the amount;
b. Consecutive 12-month total of VOC emissions including the calculations used to determine the amount;

c. Consecutive 12-month total of total HAP emissions including the calculations used to determine the amount; and
d. Consecutive 12-month total of individual HAP emissions including the calculations used to determine the amount.

20. Provide a list of all the air emission control devices (such as fabric filters, electrostatic precipitators, wet scrubbers, cyclones, thermal oxidizers, flares, catalytic reactors, carbon absorbers, absorption towers, emission control hoods or vents and biofilters) used at the facility. Include the following information with the list of devices:

    a. The installation date (month, day, and year) of the device;
    b. A copy of the engineering and/or design specification for the device;
    c. A list of the air pollutants (such as HAP, VOC, or criteria pollutants) that the device is used to control;
    d. The type of fuel used in each device (including annual fuel usage rate and copies of documents showing usage, maintained for the previous 5 years to present);
    e. The destruction efficiency (DE) for the device and the method used to determine it (include any supporting documentation such as stack or performance test);
    f. Any monitoring records or computer charts for operating information and parameter monitoring collected (e.g., temperature and pressure) for the device for the last 5 years;
    g. A description of how the device is maintained, including copies of maintenance records;
    h. Copies of permit applications or notifications to FDEP concerning the device, if applicable; and
    i. Any Startup, Shutdown, and Malfunction (SSM) plans and reports (copies of reports maintained for the previous 5 years to present) for the device.

21. Provide information for any other method used by the facility to demonstrate compliance with the air emission limits as required in the facility's Title V permit, for the last 5 years. Also, specifically identify the method used for each emission unit to demonstrate compliance.

22. Provide copies for all monthly logs (for previous 5 years to present) used by the facility to comply with the recordkeeping and reporting requirements listed in the facility's Title V permit.

23. Provide copies of all emission tests (such as visible emission/Method 9 and performance tests for newly installed, constructed, or reconstructed processes or control equipment) used by the facility to comply with the Title V permit requirements (for previous 5 years to present) applicable for any process at the facility.

ENCLOSURE B

STATEMENT OF CERTIFICATION

I certify that I have personally examined and am familiar with, the statements and information submitted in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true, correct, accurate, and complete.

Date: _____

Signature: _____

Title _____