Memorandum of Agreement
between NASA Headquarters and
MSFC
For
NASA Principal Center for Review of
Clean Air Regulations

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MSFC/NOET/ED36 Mr. Salvadore V. Caruso
Background

- NASA HDQ (Code JE and Code M) has asked MSFC to serve as principal center for review of Clean Air Act (CAA) regulations
  - Hazardous Air Pollutants (HAPs)
  - Ozone Depleting Chemicals (ODCs)
  - Volatile Organic Compounds (VOCs)

- Materials and processes utilized in the manufacture of NASA’s programmatic hardware contain HAPs, VOCs and ODC.
NASA Operational Environment Team (NOET)

- Established at MSFC in 1992 to support /facilitate activities related to achieving environmental compliance in the manufacture of NASA program hardware

  - Design
  - Development
  - Test
  - Use
  - Production
NOET (Cont'd)

- Revision of current NOET charter underway.
- Emphasis of revised charter
  - Principal Center for review of CAA regulations
  - Biennial conferences on aerospace, materials replacement technology
  - Flight performance of alternative materials and processes
  - Acquisition Pollution Prevention Team (AP²)support
  - NOET website upgrades
  - Shuttle Replacement Technology Team support
Purpose of Principal Center

- Provide centralized support to NASA/HDQ Code JE for the management and leadership of NASA’s CAA regulation review process
- Identify potential impact of proposed CAA regulations on NASA program hardware and supporting facilities
  - The EPA is required by CAA to promulgate 174 National Emission Standards for Hazardous Air Pollutants (NESHAPs)
  - Approximately 30 NESHAPs could potentially impact NASA program hardware and supporting facilities
Purpose of MOA

- Establishes MSFC–Materials, Processes & Manufacturing Department (MP&M) as Principal Center for review and comment on EPA proposed CAA rulemaking.

- Formalizes the historical working relationship between Headquarters (Code JE & Code M), NOET and MP&M on review of CAA regulations.

- Provides funding mechanism from Code JE to support the CAA review effort.
Corporate Knowledge at MSFC

- **1991**: MSFC–MP&M began reviewing ODC usage
- **1992**: NOET chartered with emphasis on design, test, production and use of program hardware
- **1992–Present**: Materials replacement research in MSFC–MP&M’s Productivity Enhancement Complex

- **1993 –1999**: MSFC–MP&M & NOET lead the EPA/Air Force/ NASA Interagency Depainting Study
Corporate Knowledge at MSFC (cont’d)


● 1995: NOET & MSFC–MP&M represented NASA at international United Nations Environmental Programme (UNEP) meeting on use of TCA in program hardware


Shuttle Replacement Technology Team (SRT$^2$)

- The SRT2 began at MSFC in 1995. It is chartered to perform following:
  - Focus on obsolescence, environmental, material issues among the major space shuttle production elements
  - Share development and test data in real time thereby reducing development schedules and costs

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MSFC - MP&M & NOET
Responsibilities

- Identify potential impact of proposed CAA regulations to NASA's program and supporting facilities
- Establish and maintain working relationships with the EPA
- Establish points of contact at other NASA Centers to represent programmatic interests
- Review proposed CAA regulations from EPA
- Develop requirements for data calls
- Collect and consolidate data responses from NASA team representatives
- Develop draft response to EPA and deliver to Code IF
MSFC–MPM & NOET Deliverables

- MSFC–MPM & NOET will provide the following deliverables to Code JE
  - Annual Task plans containing project objectives, deliverables & schedules for CAA regulatory support activities
  - Quarterly status review of current & planned CAA regulatory activities
  - Data calls for comments on proposed CAA regulations
  - Consolidated NASA comments resulting from responses to data calls
HQ Code JE Responsibilities

- Issue data calls to NASA Centers & supporting facilities
- Submit final comments to EPA on proposed rulings
- Review & approve Annual Task plan from Principal Center (MSFC)
- Provide funding to MSFC for contractor support
- Evaluate requirements for continuation of activities
HQ Code M Responsibilities

- Provide Institutional Program Office support to MSFC for civil service staffing
- Evaluate requirements for continuation of activities
Principal Points of Contact

- NASA HDQ – Code JE
  - Ms. Olga Dominguez
  - Ms. Maria Bayon
- NASA HDQ – Code M
  - Mr. Sam Malone
- MSFC MP&M, NOET
  - Dr. Ann Whitaker
  - Mr. Salvadore V. Caruso
Status of Agreement