National Aeronautics and Space Administration

Goddard Space Flight Center
Wallops Flight Facility
Wallops Island, VA 23337

Reply to Attn of: 250.W

March 5, 2020

MEMORANDUM FOR THE RECORD

FROM: 250.W/Supervisory Environmental Engineer

SUBJECT: 2020 Risk Management Plan Applicability Review

A review of the applicability of a Risk Management Plan (RMP; Clean Air Act section 112(r)) for NASA Goddard Space Flight Center's Wallops Flight Facility (WFF) was conducted in February of 2020 by WFF Environmental Office. Lists for threshold quantities of regulated toxic and flammable substances (indicated in 40 Code of Federal Regulations [CFR] 68.130; **Enclosure 1**) were consulted to determine if quantities of listed substances currently present at WFF, or which may be present in the next year, would exceed these limits. The substances considered, Chemical Abstracts (CAS) numbers, use at WFF, maximum amounts currently present (or which may be present in the next year) at WFF, regulatory thresholds for a RMP, and the sources of this information are shown in the following table.

Substance	CAS Number	Use	Maximum Amount Stored (pounds)	RMP Threshold (pounds)	Data Sources
1,1-difluoroethane	75-37-6	Aerosols	17.22	10,000	HMMS
Acetylene	74-86-2	Welding	804.76	10,000	H. Haugh; J. Milliner
Butane	106-97-8	Laboratory, fuel	121.74	10,000	M. Culver; HMMS
Chloroform	67-66-3	Analytical laboratory	5.45	20,000	HMMS
Dimethyl ether	115-10-6	Solvent additive	4.74	10,000	HMMS
Ethane	74-84-0	Analytical laboratory	0.89	10,000	HMMS
Formaldehyde	50-00-0	Analytical laboratory	39.24	15,000	HMMS
Hydrochloric acid (37%+)	7647-01-0	Analytical laboratory; rocket motor processing	1654.97	15,000	M. Culver; HMMS
Hydrogen	1333-74-0	Gas sampling	21.3	10,000	J. Freischlag
Hydrogen sulfide	7783-06-4	Rocket motor processing	0.78	10,000	HMMS
Hydrazine	302-01-2	Spacecraft fueling	5,000 (proposed)	15,000	J. McAllen
Isobutane	75-28-5	Aerosols	113.32	10,000	HMMS
Isopentane	78-78-4	Small engine fuel	146.05	10,000	HMMS
Methane	74-82-8	Rocket motor processing	8.08	10,000	HMMS; H. Haugh
Nitric acid (80%+)	7697-37-2	Analytical laboratory	5.44	15,000	M. Culver
Propane	74-98-6	Heating and cooling	**820,620**	**10,000**	M. Culver
Propylene	115-07-1	Epoxy	24.24	10,000	HMMS
Propylene oxide	75-56-9	Industrial cleaning	26.99	10,000	HMMS

As shown in the table above, only one of the substances considered, propane, exceeds the regulatory threshold for the establishment of a RMP. However, as of March 13, 2000, substances listed as regulated flammable substances under 40 CFR 68.130 that are used as fuel are excluded from the mandate to develop a RMP (40 CFR 68.126; **Enclosure 2**).

Therefore, because propane is used as fuel at WFF, and because none of the other substances considered exceed their RMP thresholds, a RMP is not required for WFF within the next year.

Please contact me at 757-824-1987 or at theodore.j.meyer@nasa.gov with any questions.

Theodore Meyer

2 Enclosures

cc: (w/o encl.)
250/Ms. K. Moxley