Space Exploration Network Services and Evolution Environmental Management Plan

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Space Exploration Network Services and Evolution (SENSE)

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Preface

The National Aeronautics and Space Administration (NASA) Exploration and Space Communications Projects Division (ESC) is a national resource located at Goddard Space Flight Center (GSFC) which enables scientific discovery and space exploration by providing innovative and mission-effective space communications and navigation solutions to a large community of diverse customers. ESC manages the Near Space Network (NSN) on behalf of the Space Communications and Navigation (SCaN) Program at NASA Headquarters.

The Near Space Network, managed by the ESC NSN Project, is a vital communications and navigation network that synthesizes government and commercial service offerings into comprehensive, robust, and reliable services to fully support the user missions. The network leverages the innovation of industry alongside NASA's time-tested expertise and proven track record of success. As a single, end-to-end network, the NSN orchestrates communications services, space links, and data transports for users through a blend of capabilities offered by NASA Government-Owned Contractor-Operated (GOCO), Commercial, and Peer Network Service Providers.

The Advanced Communications Capabilities for Exploration and Science Systems (ACCESS) is a GOCO service provider. The ACCESS project operates, maintains, and sustains NASA's GOCO Space Relay (SR) and Direct-To-Earth (DTE) ground and flight-based systems.

The Space Exploration Network Services and Evolution (SENSE) Contract supports the NSN Project and ACCESS Project enabling the reliable and highly available communication and navigation services offered by Near Space Network while simultaneously implementing efficiencies as the ESC moves forward to develop the next generation of space communications and navigation services.

a. SENSE is an Indefinite Delivery, Indefinite Quantity (IDIQ) contract that performs continuous operations, maintenance, and sustainment of the NSN to support missions throughout their entire lifecycle, providing requirements analysis, spectrum management, communications link analysis, network loading assessments, service agreements, mission design, mission planning, launch and early orbit operations, routine on-orbit operations, and post-mission support activities.

b. NASA issues task orders that specify the work to be performed, including the requirements to be met, the standard(s) of performance, required deliverables or output, government furnished property or information, and applicable documents within this broader contract scope. Requirements are generally levied at the contract level, the task order level or sometimes at both levels.

The SENSE contract also supports other related activities both inside and outside of the Near Space Network to including operation, maintenance, and sustainment of the Very Long Baseline Interferometry (VLBI) Network, Satellite Laser Ranging (SLR) Stations and the Electronic Systems Test Laboratory (ESTL).

This document applies to all SENSE contract organizations, personnel, and activities supporting the SENSE Contract Statement of Work (SOW) and any IDIQ Task Order SOWs.

This document is under the configuration control of the SENSE Program Management Office (PMO) Configuration Review Board (CRB). Changes to this document will be made by Documentation Change Notice (DCN) or by complete revision. Proposed changes to this document must be submitted along with supportive material justifying the proposed change. Comments or questions concerning this document and proposed changes will be addressed to:

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Section 1. Introduction

1.1 Purpose

This plan describes the Environmental Management program, practices, and procedures for all Space Exploration Network Services and Evolution (SENSE) contract locations. Adherence to this plan will help ensure environmental stewardship on the contract.

To achieve this, SENSE will utilize an integrated systematic approach to establish, implement, manage, and maintain an effective Environmental Management Program. Our Environmental, Health and Safety (EHS) Management System and associated programs are designed around the primary program management roots of Plan, Implement, Check and Correct, and Management Review. In addition, the five levels of the Peraton EHS Management System (Figure 1-1) are applied to establish, implement, manage, and maintain our SENSE Environmental Management System (EMS). The EMS provides a system for maintaining, calibrating, and repairing all equipment to prevent an environmental nonconformance or noncompliance.

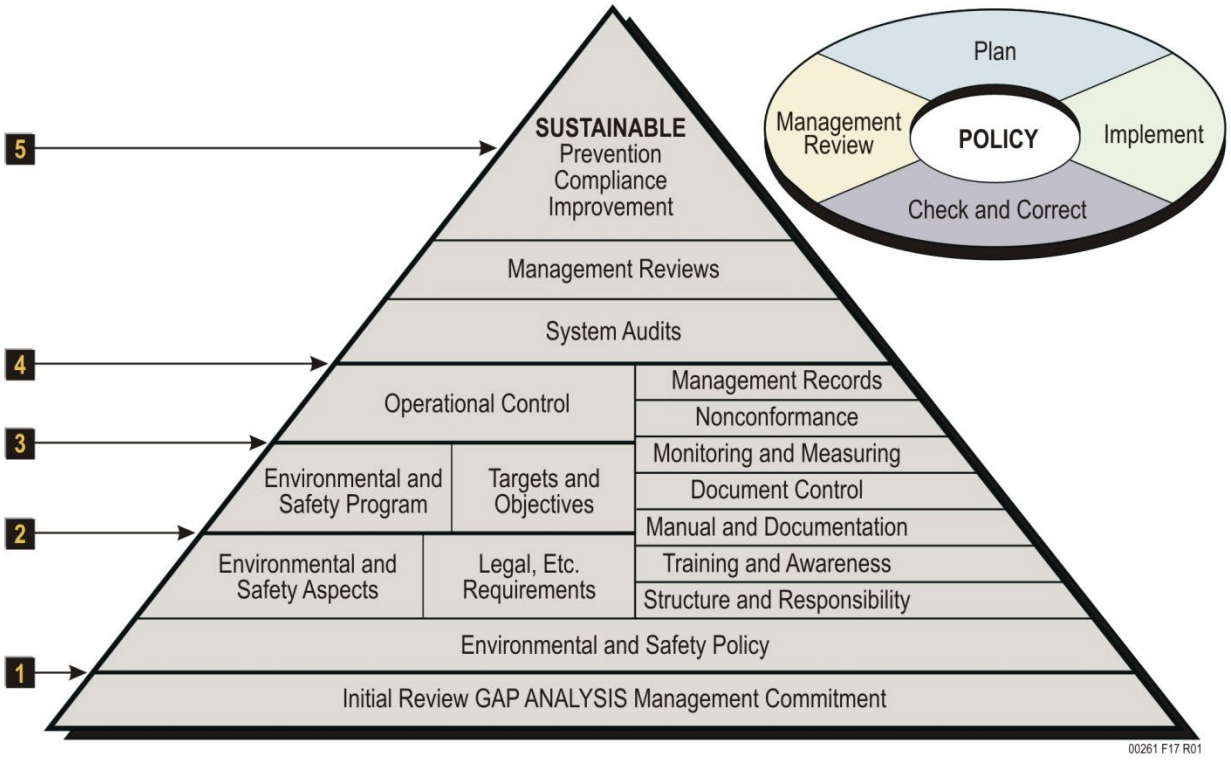

Figure 1-1. Peraton EHS Management System

This Environmental Management Plan (EMP) encompasses the requirements of applicable National Aeronautics and Space Administration (NASA), Federal, state, and local regulations and reporting requirements for the SENSE sites; SENSE EHS project orders and program internal operating procedures; and the policies and procedures of SENSE as specified in the contract. The

SENSE contract will meet or exceed the requirements of the referenced documents in their latest revision.

1.2 Scope

This EMP is applicable to all SENSE sites, Peraton personnel, and subcontractor personnel, associated with the SENSE contract.

This Plan will be reviewed and updated annually to ensure it meets current NASA, Peraton, Federal, and state requirements.

1.3 Reference Documents

This EMP meets or exceeds the following requirements in the NASA, Peraton, and Federal references listed here.

1.3.1 NASA GPR and GPD Documents

a. GPD 8500.1, *Environmental Policy and Program Management*.
b. GPR 8500.1, *Environmental Planning and Impact Assessment*.
c. GPR 8500.3, *Waste Management*.
d. GPR 8500.4, *Air Quality Management Program*.
e. GPR 8500.5, *Water Management*.
f. GPR 8500.8, *Site Investigation and Remediation.*
g. GPR 4100.2, *Hazardous Material Data Management.*
h. NPR 8553.1, *NASA Environmental Management System.*
i. NPR 8580.1, *NASA National Environmental Policy Act Management Requirements.*

1.3.2 Peraton Environmental Policies and Standard Practices Documents

a. EHS-001, *Management System*.
b. EHS-002, *Risk Assessment and Management*.
c. EHS-003, *Implementation and Operations*.
d. EHS-009, *Environmental Compliance*.
e. EHS-010, *Audits and Assurance*.

1.3.3 SENSE Applicable Documents

a. SENSE-PMO-EPDRP-001, *Space Exploration Network Services and Evolution Emergency Preparedness and Disaster Recovery Plan.*
b. SENSE-PMO-PLAN-017, *Space Exploration Network Services and Evolution (SENSE) Safety and Health Plan*.
c. SENSE-PMO-PLAN-020, *Space Exploration Network Services and Exploration Risk Management Plan.*
d. SENSE-PMO-SOP-004, *Space Exploration Network Services and Evolution Standard Operating Procedure for Document Control*.
e. SENSE-PMO-SOP-005, *Space Exploration Network Services and Evolution Standard Operating Procedure for Record Control*.

f. SENSE-PMO-PROC-050, *SENSE EHS Project Review Process*.

1.3.4 Federal Regulations Documents

a. 40 CFR Subpart I, *Hazardous Waste Regulations*.
b. 49 CFR Subpart C, *Hazardous Materials Regulations*.
c. 49 CFR Subpart H, *Hazardous Materials Training*.
d. 30 CFR Subpart C, *Pollution Prevention and Control*.
e. 40 CFR Section 608, 609, *Stationary Refrigeration and Air Conditioning*.
f. 40 CFR Parts 150-189, *FIFRA, Statute, Regulations & Enforcement*.
g. NEPA, *National Environmental Policy Act.*
h. Exec. Order 12114, *"Environmental Effects Abroad of Major Federal Actions."*
i. NHPA, Section 106, *"Section 106 of the National Historic Preservation Act."*

1.3.5 Consensus Technical Standards Documents

ASTM E1527-13, *Phase I Environmental Site Assessment.*

1.4 Environmental Policy

SENSE is committed to a worldwide leadership role in protecting the environment. In this regard, we will promote and protect the environment of those communities in which we operate. SENSE complies with the applicable contract, government, and Peraton requirements while ensuring that the SENSE EMS continually improves.

In support of this EMS, supervisors will, as appropriate, establish and maintain operating procedures specifically planned to prevent workplace conditions that could pose a threat to the environment. In addition, each employee will be responsible for integrating the elements of compliance, pollution prevention, and continual improvement into every job they perform.

This commitment to responsible environmental leadership will be communicated to all SENSE employees, teammates, subcontractors, vendors, and customers.

1.5 Compliance

Implementing an effective world class EMS is only possible in compliance with environmental regulations. SENSE will:

a. Adhere to all Peraton policies; comply with all applicable Federal, state, and local environmental legislation and regulations, as well as NASA requirements applicable to the SENSE contract.
b. Implement programs and procedures to ensure environmental compliance, including periodic audits of all operations.
c. Educate and motivate all employees to conduct activities in an environmentally responsible and safe manner.

1.6 Prevention and Pollution

SENSE integrates pollution prevention measures into all operations to protect the communities that we operate within and will:

a. Conduct all work in a manner that will eliminate or minimize environmental pollution to the atmosphere, land, and water.
b. Systematically assess the environmental implications of new products and processes prior to their introduction into the workplace.
c. Strive to preclude accidental releases to the communities in which we operate by employing safe technologies and operating procedures.
d. Implement emergency plans and procedures to ensure appropriate response to unexpected or mishap incidents.
e. Seek opportunities to substitute less hazardous materials in our processes, practice reduction of waste (hazardous and non-hazardous), and dispose of such waste safely and responsibly.
f. Investigate opportunities, when feasible, to reduce the consumption of natural resources and energy, and encourage the reuse or recycling of materials.
g. Utilize environmentally preferred materials in support of our operations whenever feasible without degrading the SENSE mission.

1.7 Continual Improvement

The fundamental value of an EMS is the continuous quest to improve our environmental programs. In this effort, SENSE will:

a. Continuously pursue opportunities to improve in all areas of environmental protection by setting operational goals. In addition, we will establish meaningful metrics to measure progress.
b. Take all appropriate actions to prevent and/or promptly correct any deficiencies identified in our products or services that could adversely impact the environment.

1.8 Authority and Accountability

Acknowledgement and confirmation are herewith given that the *SENSE EMP* will be consistent with applicable NASA requirements and contractual direction as well as applicable Federal, state, and local regulations.

As noted on the approval/signatory page, the SENSE EHS Manager will take responsibility for the implementation of the *SENSE EMP.*

Section 2. Management Structure

2.1 Organizational Structure

The SENSE contract is managed by the Goddard Space Flight Center (GSFC) and led by the SENSE Program Manager (PM). The SENSE team provides operation, services, maintenance, and engineering support under the SENSE contract and is fully integrated to support the NASA customer in meeting the SENSE mission. The EMS is a critical component of ensuring the successful implementation of the SENSE mission.

2.2 Responsibilities

The successful implementation, maintenance, and continuous improvement of the EMS are dependent on all our team members successfully delivering on their responsibilities.

2.2.1 SENSE Program Manager/Deputy Program Manager

a. Funding SENSE environmental program development, implementation, and sustainability.
b. Submitting contract modification requests for environmental tasking outside the current scope of work.
c. Maintaining appropriate resources and EHS qualified staff to support SENSE sites.
d. Demonstrating a commitment to the implementation of the SENSE environmental mission, principles, and practices.
e. Establishing and communicating responsibilities as they relate to the EMS.
f. Establishing minimum criteria for environmental data collection to be used in management reviews.

2.2.2 SENSE EHS Manager

a. Implementing this Plan across SENSE locations as approved by NASA.
b. Developing and submitting environmental metrics, as directed, to include accidental release information and other program deliverables to the SENSE PM.
c. Demonstrating a commitment to the implementation of the SENSE environmental mission, principles, and practices.
d. Maintaining appropriate resources and EHS qualified staff to meet the needs of the populations served.
e. Requesting contract modifications to the SENSE PM/Deputy PM for environmental tasking outside the current scope of work.
f. Demonstrating by example full support of the environmental program.
g. Establishing and communicating responsibilities as they relate to the SENSE EMS.
h. Ensuring that EHS specialists know their environmental responsibilities and are trained to carry out their duties, as well as communicating responsibilities to site and line/department managers at the SENSE locations.

i. Establishing criteria for environmental data collection to be used in EHS management reviews.
j. Approving environmental plans and programs.
k. Chairing EHS Management Reviews.

2.2.3 Site and Line/Department Managers

a. Ensuring that SENSE environmental policies and procedures are implemented.
b. Providing full support and commitment for an effective environmental program.
c. Establishing and communicating responsibilities for this program.
d. Assessing the effectiveness of the program by regularly reviewing and evaluating results and reports.
e. Initiating discussions regarding environmental stewardship with reporting staff and managers (such discussions should deal with program progress, specific needs, and any special projects or activities).
f. Demonstrating by example support of SENSE environmental program and demanding high standards of environmental stewardship from all employees.
g. Ensuring that environmental responsibilities are included in subordinate manager and supervisor performance appraisals.
h. Ensuring that all workplaces conduct effective self-inspection programs.
i. Ensuring that supervisors know their environmental responsibilities and are trained to carry out their duties.

2.2.4 Supervisors/Leads

a. Implementing recommendations to improve the overall environmental condition as directed by upper management.
b. Providing function specific inspection and guidance for all employees within the working group.
c. Reviewing, updating, and implementing area environmental procedures.
d. Providing an environmental training program for employees within their area of prime responsibility.
e. Maintaining a continuing inspection program to identify and mitigate potential environmental impacts.
f. Reviewing, approving, distributing, conducting, and documenting environmental training materials, as applicable.
g. Recognizing and rewarding exemplary behaviors and administering coaching, counseling, and disciplining, where appropriate, when employees have not adhered to Federal, state, local, Peraton, SENSE, or NASA environmental rules, policies, and procedures.

2.2.5 Employees

a. Performing duties in a manner to ensure minimum impact to the environment.

b. Obtaining specific instructions or clarifications from supervisor or manager before proceeding with assigned work in situations where an environmental requirement or procedure is not completely understood.
c. Assisting in environmental inspections as required.
d. Attending scheduled training.
e. Understanding and complying with environmental procedures, including hazardous materials and chemical requirements.
f. Reporting spills or environmental impacts immediately to supervisor and SENSE EHS Team.

2.2.6 SENSE Environment, Health and Safety (EHS) Team

a. Managing emerging Federal, state, local, SENSE, and NASA issues concerning environmental protection in concert with Peraton policies and procedures.
b. Deploying to field locations EHS policy, directives, guidance documents, training tools, program management tools, and other communications as may be appropriate to ensure EHS program continuity and implementation.
c. Scheduling and participating in Peraton directed EHS programmatic audits for field locations. (The SENSE EHS Program will be typically audited at a frequency of once every three years or as deemed appropriate by the Corporate Director of EHS).
d. Utilizing resources, which include regulations, best practices, environmental policies and procedures, online training, lessons learned, and other professional environmental program management tools.

2.2.7 Suppliers

a. Comply with all applicable Federal, state, local, SENSE, and NASA regulations and requirements concerning environmental protection.
b. Take all appropriate actions to prevent and/or promptly correct any deficiencies identified in products or services provided to SENSE that could adversely impact the environment.
c. Conduct all work in a manner that will eliminate or minimize environmental pollution to the atmosphere, land, and water.

Section 3. Planning

3.1 General

Planning is necessary to ensure significant environmental impacts are considered when developing, implementing, and continuously improving this EMS. Environmental impacts are assessed during the entire lifecycle of SENSE operations and activities including, but not limited to the following:

a. Releases or emissions to the air, water, and land.

b. Consumption of natural resources, raw materials, or energy.

c. Hazardous and nonhazardous byproducts.

Initial reviews, risk assessments, and feedback from operational control processes, monitoring, inspections, self-evaluations, audits, investigations, and management reviews are utilized to support the planning process. A list of environmental impacts is published at least annually.

3.2 Initial Reviews

An initial assessment or baseline review of the EHS Management System will be completed in the first year of the SENSE contract to determine compliance with legal and other requirements applicable to the SENSE operations. A copy of the findings from the Environmental Baseline Survey documents the initial review. All purchase acquisitions and proposed changes to operations and facilities are reviewed for environmental aspects and potential impacts. These are documented in accordance with SENSE-PMO-PLAN-017, *Space Exploration Network Services and Evolution* (*SENSE) Safety and Health Plan.*

3.3 Risk Assessment

Central to the identification of environmental aspects is the performance of some level of impact analysis and risk assessment, and the subsequent prioritization. Risk assessment is incorporated into the EHS planning process to determine aspects that have significant impacts to the environment per SENSE-PMO-PLAN-020, *Space Exploration Network Services and Evolution Risk Management Plan*. All environmental risks are captured on the SENSE Environmental Aspects and Impacts/Occupational Health and Safety Risk Assessment which is updated annually.

3.4 Environmental Objectives, Targets, and Programs

Objectives and targets are necessary to drive continuous improvement of the SENSE EHS program. The programs under consideration will be based on significant environmental aspects and impacts, technology options, financial issues, legal/regulatory requirements, operational and business plans, and the customer requirements. All developed objectives and targets are Specific, Measurable, Achievable, Realistic, and Timely (SMART) and have established Timetables for completion.

Objectives and targets from the site-specific significant environmental aspects and risk assessment will be reviewed and published annually and incorporated in the annual EHS Objectives. Implementation plans are developed for EHS objectives and targets. The plans define the resources, responsibilities, timeframes, intermediate steps, and appropriate measures of progress.

3.5 Preventive Actions

SENSE incorporates several preventive actions during operations and at individual SENSE sites, including but not limited to:

a. Elimination/replacement of hazardous chemicals or processes with less hazardous chemicals or processes wherever feasible.
b. Use of secondary containment in place should there be a spill to reduce likelihood of a release to the environment and to more readily identify a leak.
c. Regular inspection of critical installations (e.g. check condition of hazardous waste storage containers, monthly inspection of fire extinguishers).

Section 4. Implementation

4.1 Operational Control

Operational controls are utilized to control activities and practices where the absence of control could lead to deviation from environmental policy, objectives, and targets. Environmental operating controls include elimination, engineering, substitution, and administrative controls.

4.1.1 Design Review/Management of Changes and Procurement

The SENSE team evaluates all changes for potential environmental aspects/impacts and safety risks in accordance with SENSE-PMO-PLAN-017. The SENSE EHS Plan has established the processes to identify and initiate appropriate steps to evaluate these environmental aspects and reduce significant impacts during:

a. New processes or operations at the design stage.
b. Changes to existing operations, products, services, or suppliers.
c. Purchasing activities.

In addition, all chemicals are procured in accordance with the SENSE-PMO-PLAN-017 and are evaluated and approved by the SENSE EHS team prior to purchase. Purchased chemicals are evaluated to ensure approved chemicals are safe for employee use, minimize potential impact to the environment from their storage and use, and minimize waste generation.

4.1.2 Environmental Impacts during Emergency Procedures

The SENSE *Emergency Preparedness and Disaster Recovery Plans (EPDRP)* outline procedures that will be implemented during emergency events to minimize potential injury, property damage, and environmental impacts. The EPDRP are reviewed annually. Tabletops and drills are conducted periodically to ensure readiness in the event of an emergency. Environmental aspects may be incorporated in these reviews and evaluated during drills and exercises as appropriate. Findings from these drills and exercises support the planning process.

4.2 Education, Training, Awareness, and Competency

SENSE Management is committed to providing a trained and effective workforce and to ensuring that employees, contractors and visitors understand applicable requirements, accountability for actions, and consequence for noncompliance. Training meets all applicable Federal, state, NASA, and SENSE requirements. SENSE determines training requirements by conducting a needs assessment based on regulatory and contract requirements, training records, audits, and identified operational environmental aspects or potential environmental impacts. Training needs have been populated into the SENSE Learning Management System (LMS). The LMS documents completion of required training and is a tool that supports management in identifying upcoming training expiration.

Successful implementation of an EMS requires understanding and participation from all employees. This is accomplished through a two-phase process as follows:

a. General awareness training on the SENSE EMS and environmental requirements communicated to personnel through the new hire orientation and update messages/awareness briefings as appropriate.
b. Specific environmental training is provided to those employees whose work has environmental aspects to ensure competence in the environmental compliance requirements and SENSE procedures.

4.2.1 Training Frequency

Training frequency is based on the employee training requirements and the risk potential for environmental impacts for SENSE operations. Additional circumstances that may dictate retraining include, but are not limited to the following:

a. Changes to procedures, processes, equipment, environmental controls, operations, or chemicals used.
b. Findings from inspections, audits, self-assessments, or management reviews.
c. Employee deficiencies observed.

4.2.2 Training Methods

SENSE delivers safety and environmental training through formal classroom sessions, Computer Based Training (CBT), use of the GSFC resources, local resources, or through on-the-job instructions. Evaluation of training effectiveness is completed through post-training testing, line management observation of performance, and performance metrics.

4.2.3 Training Records

Training completion is documented and tracked in the SENSE LMS. Rosters, training presentations, and other records are maintained in the SENSE DM system. If training is provided by external sources, employees gather and deliver certificate of completion, course material, and the organization/names of the training supplier to the SENSE Training Coordinator to record. Training reports are provided periodically to managers for review to ensure that all employees are completing the required training for their job tasks.

4.3 Communications

The EMS is contingent on effective internal communication between SENSE team member organizations, clear communication of our environmental procedures to our subcontractors or other visitors and partnering with our GSFC customer. Environmental management reports and the frequency at which they are submitted to NASA is included in the environmental aspect sections proceeding this section.

4.3.1 Internal Communication

Internal communication is necessary to ensure effective implementation of the SENSE EMS. SENSE utilizes presentations, department meetings, SENSE Intranet EHS site, SENSE Portal, Peraton EHS website, email notifications, newsletters, bulletin boards, working groups, and other internal methods to communicate internally. Employees also are encouraged to raise concerns and recommendations for improvement to their supervisor or SENSE EHS Team members to help facilitate continuous improvement.

4.3.2 Contractor and Visitor Communication

The SENSE EHS Manager is responsible to ensure our process is effective for communicating applicable environmental procedures to all applicable contractors and visitors authorized to complete assigned work at SENSE locations. Communication is conducted during contractor/visitor orientations, which are conducted prior to initiating work onsite.

4.3.3 Spill Prevention, Control, and Reporting

All spills, including those that are incidental to operations and/or are cleaned up locally by site employees, will be communicated to SENSE EHS Manager, Code 250 Medical and Environmental Management Division, and the Contracting Officer. Spill cleanup is only performed by appropriately trained personnel.

4.3.4 External Communication

All inquiries for environmental aspects and impact from external organizations regarding SENSE locations and operations will be routed to the Peraton Communications and Public Relations Organization and copied to the GSFC Code 250 Medical and Environmental Management Division. SENSE personnel are not authorized to communicate directly to external requests for information unless authorized by Peraton and the GSFC. Examples of External Communications include public inquires in the form of letters, emails, faxes, and telephone calls.

4.4 Recordkeeping and Document Control

Document and record control are managed in accordance with SENSE-PMO-SOP-004, *Space Exploration Network Services and Evolution Standard Operating Procedure for Document Control*, and SENSE-PMO-SOP-005, *Space Exploration Network Services and Evolution Standard Operating Procedure for Record Control*. In general, these procedures ensure documents are:

a. Approved for adequacy prior to issue.
b. Reviewed, updated, and re-approved as necessary.
c. Updated with revision status of documents.
d. Legible and readily identifiable.
e. Controlled to ensure proper distribution.
f. Protected against deterioration or loss and are retained for a specific period.

SENSE environmental documents and records will be electronically filed in the SENSE EHS drive to ensure SENSE personnel have access to the most current publications.

Section 5. Evaluation, Checking, and Corrective Action

5.1 General

Evaluation and measurement procedures enable SENSE to gauge environmental performance, identify areas where corrective action is needed, improve performance, and increase efficiency.

5.2 Metrics

SENSE Management will identify key indicators to manage significant impacts, achieve established objectives and targets, evaluate compliance, and improve performance as appropriate in the overall SENSE EHS program. Metrics will utilize leading, current, and trailing indicators as applicable to best measure these key indicators. SENSE selected metrics and frequency of review will be published and maintained in the SENSE Data Management System.

5.3 Self-Assessment

An environmental self-assessment, otherwise known as internal audit, is completed annually for SENSE to ensure the requirements of the EMS have been effectively implemented and maintained. This is completed as part of the annual Peraton EHS Self-Assessment. SENSE managers and employees partner to conduct this audit, with support from the SENSE EHS Manager to ensure objectivity and impartiality during the assessment. Self-assessment findings are compared to baseline initial reviews, environmental regulations, and other existing documentation to assess the effectiveness of the SENSE EMS. The SENSE EHS Team is responsible to ensure a self-assessment is conducted annually and the SENSE EHS Manager approves the findings of this audit. The self-assessment provides direct feedback to the planning process to develop or modify objectives and targets. Audit reports are provided to the Peraton Critical Network EHS Director annually.

5.4 Management Review

A Management Review which includes a review of our environmental compliance is completed at least annually during the Peraton EHS Management Review process. This review will assess the SENSE EMS effectiveness, identify areas for improvement, determine any necessary changes, and follow-up on corrective action implementation to verify effectiveness of selected controls. The Management Review will be chaired by the SENSE PM, SENSE Deputy PM, or management designee. Records from the meeting such as agendas, minutes, attendance roster, evaluations, status of audits, and corrective actions will be documented and maintained in the SENSE Data Management (DM) System.

The final Management Review findings will be provided to the SENSE PM for review and approval. Findings from the Management Review process also provide direct feedback to the SENSE EMS planning process.

5.5 Environmental Nonconformance or Noncompliance

Nonconformance to the SENSE EMS or noncompliance to applicable environmental regulations identified during audits, inspections, employee reports, self-assessment, management reviews, or other means are investigated to determine contributory and root causes enabling the deficiency. Corrective actions are developed and implemented to prevent future occurrences of causal factors, particularly the root cause. All corrective actions identified because of nonconformance or noncompliance are tracked on the SENSE EHS Rolling Action Item List (RAIL) by the SENSE EHS Manager to completion.

Section 6. Environmental Planning and Impact Process

6.1 General

SENSE will ensure compliance with the National Environmental Policy Act (NEPA) and other environmental planning regulations including 40 CFR 1500-1508, 14 CFR Part 1216 Subpart 1216.3, NASA Procedural Requirements (NPR) 8580.1, and Goddard Procedural Requirements (GPR) 8500.1 to minimize impact to the environment and avoid scheduling impacts to proposed projects.

NEPA is a United States environmental law that established a U.S. national policy promoting the enhancement of the environment. NEPA's most significant effect was to set up procedural requirements for all Federal government agencies to prepare Environmental Assessments (EA) and Environmental Impact Statements (EIS). EA and EIS contain statements of the environmental effects of proposed Federal agency actions.

SENSE utilizes the methods described in Section 4 of this Plan to identify potential impacts of proposed projects. If any potential impacts are identified, the SENSE EHS Manager will coordinate with the GSFC Environmental Program Managers and begin the applicable environmental assessment process prior to moving forward with the proposed project.

6.2 Pesticide/Herbicide Usage

The use of pesticides at SENSE locations is necessary to control insects, rodents, and other pests. Adequate pest control prevents disease and property loss. There are several types of pesticides used for multiple applications. The Environmental Protection Agency (EPA) classifies certified applicators as either private or commercial and the standards for applicators can be referenced at 40 CFR parts 150-189. Restricted use pesticides can only be handled by certified individuals. Special training in handling and applying the pesticide is necessary to ensure its safe use. Under Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), the sale of restricted use pesticides is limited to certified applicators for use by those applicators or persons under their direct supervision. Applicators and supervisors of restricted use pesticides must be certified under Section 11 of FIFRA.

SENSE procures only licensed and competent subcontractors for the application and use of pesticides. A copy of pesticide applicator certifications is collected, and chemicals reviewed by the SENSE EHS Team prior to work. Applicator license records are maintained in the SENSE Data Management System. Only over-the-counter pesticides that do not require licensing are used by SENSE personnel.

The SENSE sites only used herbicides that are available over-the-counter and available to residents for home use. These products are used in accordance with the manufacturer's application instructions and as such there are no additional certification requirements associated with their application.

6.3 Endangered Species

SENSE has surveyed the endangered and threatened species around our locations. Any changes to SENSE operations or construction activities are planned with the consideration of endangered and threatened species impacts to minimize or eliminate the effects on wildlife. SENSE leverages local agencies for guidance on current regulatory requirements and reduction of impacts.

Section 7. Water Management

7.1 Water Management Compliance

SENSE ensures compliance with all water management regulations including 40 CFR Chapter I, Safe Drinking Water Act (SDWA) and GPR 8500.5.

7.2 Drinking Water Management

SENSE complies with the SDWA, 42 U.S.C. §300f et seq. (1974) to ensure its employees and visitors have a safe, clean, and adequate supply of drinking water. Drinking water testing and compliance is managed by SENSE locations, and the water is tested periodically for microbiological and chemical contaminants. The evaluation of samples is completed by a qualified laboratory that utilizes the appropriate quality control and quality assurance measures. The SENSE EHS Site Representative maintains copies of drinking water records, water sampling data, and related reports to verify compliance and maintain records electronically filed in the DM.

Drinking water management on host sites is managed by their Host, (e.g. U.S. Navy). The Host is responsible for performing drinking water samples and ensuring compliance with drinking water standards. SENSE also evaluates changes to the system providing drinking water at each of the sites to ensure the system is protected from contamination from SENSE activities.

7.3 Wastewater Management

SENSE complies with all wastewater regulations and requirements, including Federal, state, local, NASA, Peraton, and GSFC. More specifically, at the White Sands Complex (WSC) operations formerly discharged sewer wastewater to two lagoons which were managed, maintained, monitored, and permitted by the White Sands Test Facility (WSTF). WSTF contractors connected White Sands Ground Terminal (WSGT) and Extended Tracking and Data Relay Satellite (TDRS) Ground Terminal (ETGT) sites to city sewer lines in July 2015, and the Second TDRSS Ground Terminal (STGT) site in August 2015. WSTF manages remediation of the closed lagoons and ensures compliance with New Mexico Environment Department (NMED) requirements for the management of wastewater to city sewage systems. The WSC also ensures compliance with wastewater requirements.

7.4 Storm Water Management

Currently there are no SENSE locations or operations that require SENSE to operate under a National Pollution Discharge Elimination System (NPDES) permit from the EPA. However, SENSE continually reevaluates this requirement if a change in footprint or operations occur, or if the EPA or state agency requests an assessment. For hosted SENSE sites, the host is responsible for all Stormwater Management with few specific exceptions. SENSE does include the evaluation of storm water runoff from any proposed project to assess environmental impact. Identified impacts are managed consistent with EPA, state, NASA, and GSFC requirements.

7.5 Underground Storage Tanks

SENSE maintains active Underground Storage Tanks (UST) and underground piping that store diesel fuel. SENSE UST are managed in compliance with EPA and state requirements, including

construction, containment, automatic tank gauging, and annual line pressure testing. Registration and permits for the UST are maintained by SENSE on an annual basis. Copies of the permits are posted at each facility where applicable. UST monthly leak test and inspection checklist logs are maintained at the facilities. Copies are also electronically filed in the site EHS drive.

7.6 Above Ground Storage Tanks

All SENSE Above-ground Storage Tanks (AST) are managed in compliance with applicable EPA and state requirements. The AST are non-regulated tanks per regulatory requirements. This is due to the above ground storage capacity of the tanks being less than 1,320 gallons, and the AST being flow through process tanks from UST to different facility components (i.e., boilers, generators). All tanks utilized at SENSE locations are Underwriters Laboratories (UL) listed tanks with secondary containment. These tanks are visually inspected monthly. A log is maintained containing the date, time, initials of the inspector, comments on the condition of the tank, and the results of each inspection. The log is maintained at the SENSE locations and a copy of these records will be electronically filed in the shared EHS drive.

SENSE actively manages tanks (e.g. AST, UST, diesel generator belly tanks, diesel fire pump tanks) in accordance with site-specific Spill Prevention, Control, and Countermeasure (SPCC) Plans where appropriate. At host locations, all fuel storage assets are managed by the host.

Section 8. Air Quality Management

8.1 Air Quality Compliance

SENSE operations follow all applicable air quality regulations including the Clean Air Act, 20.2.1-99 NMAC, state regulations, GPD 8500.1, and GPR 8500.4. Currently, there are no air emissions related to SENSE activities that require air permits in accordance with EPA or state requirements. Boilers and generators operated at SENSE locations are below regulatory permit thresholds. In addition, ultra-low sulfur fuel is utilized in the generators to lower air emissions. Records of monthly generator run time usage are documented to ensure run times are maintained below thresholds that would warrant a permit. The tracking sheets include both emergency and non-emergency use to ensure operations are within air permitting requirements. These records/logs are maintained at individual SENSE locations.

All proposed projects and changes to operations are evaluated early in the preplanning stage for potential air emissions to maintain compliance with applicable requirements. This is accomplished through SENSE-PMO-PROC-050, the *SENSE Environmental Health and Safety Project Review (EHSPR) Process*.

8.2 Ozone Depleting Substances

SENSE complies with requirements of Section 608 of the Clean Air Act, and manages ozone depleting substances as follows:

a. Technicians, including SENSE employees and contractors, servicing air-conditioning and refrigeration equipment must meet EPA certification criteria by passing an EPA-approved examination. Refrigerant management database with electronic copies are stored on the sites' shared drives.

b. Technician qualifications must be verified before the initial start of work. Verification will consist of assuring the technician holds a valid EPA certification card.

c. SENSE locations will keep a copy of all technician certification cards on file.

d. SENSE locations will maintain an inventory of all equipment on site containing ozone depleting substances.

e. SENSE will maintain refrigerant log records documenting dates, refrigerant charge amounts, and related information for equipment servicing and disposal.

Section 9. Waste Management

9.1 General

SENSE locations manage waste (including nonhazardous, hazardous, and universal waste) in accordance with applicable regulations including the Resource Conservation and Recovery Act (RCRA), 40 CFR, the Toxic Substance Control Act (TSCA), state regulations, and GPR 8500.3. Specific procedures on management of hazardous, nonhazardous, and universal waste are provided in site-specific documentation.

9.2 Solid Waste (Nonhazardous)

All nonhazardous solid waste generated at SENSE locations is disposed of in designated trash receptacles and dumpsters. The following are not permitted in nonhazardous trash receptacles and dumpsters:

a. Hazardous wastes, radioactive waste or medical wastes.
b. Universal wastes.
c. Regulated asbestos-containing material (ACM).
d. Trash generated off-site.
e. Liquids.
f. Improperly cleaned or prepared containers (e.g. paint cans).
g. Scrap metal and recyclables that are managed by recycling programs.

SENSE locations conduct container inspections throughout the facility to ensure proper disposal of waste during routine inspections conducted to support the EHS program. SENSE facilities provide dumpsters and trash receptacles for use at the sites. SENSE locations maintain records of annual solid waste disposal documents and submit them to NASA as applicable.

9.3 Recyclable Materials

SENSE sites recycle white paper and cardboard waste streams onsite. Recycling receptacles and dumpsters are provided for use by all SENSE personnel. SENSE locations maintain records of recycled materials and submit them annually to NASA as applicable. On hosted SENSE sites, recycling is managed through the hosts. SENSE locations also recycle several universal waste streams that would otherwise be hazardous such as light tubes and batteries whenever possible.

9.4 Hazardous Waste Management

All SENSE sites generate less than 220 pounds (100 kg) of hazardous waste per month and do not generate any acutely hazardous waste. Either SENSE or the site host is responsible for disposing of all hazardous waste at SENSE locations. The SENSE team or the site host manages hazardous wastes and EPA Identification Numbers for the site. State regulations are adhered to relative to hazardous waste generation quantities and associated requirements. All hazardous wastes generated at SENSE sites are sent to permitted hazardous waste facilities for disposal and managed by best management practices to minimize potential impact to the environment.

The hazardous waste generated onsite are managed in the following manner:

a. All process byproducts and wastes are identified and profiled to determine if they are a listed hazardous waste (e.g. F, K, P, or U codes), demonstrate hazardous waste characteristics (e.g. D001-D043), or contain unique hazardous components requiring special disposal considerations (e.g. lasers, electronic wastes, travelling wave guides, Klystrons, Polychlorinated Biphenyls (PCB) containing ballasts). Some of these materials are not covered by RCRA requirements, but rather are managed under TSCA or other regulations.

b. In the absence of clear generator knowledge, determination of waste status is made by a laboratory certified in the jurisdiction.

c. Hazardous wastes are never mixed with other wastes.

d. Waste storage areas are designated and clearly identified as waste storage areas and are equipped with proper containment for potential spills and leaks.

e. Hazardous wastes are only stored in approved, properly labeled, compatible containers in good condition.

f. Hazardous waste containers maintained at or near the point of generation are inspected daily by supervisors to ensure they are not leaking, in good condition, labeled and marked appropriately, and stored in a safe manner.

g. Formal inspection of all hazardous waste containers is conducted and documented monthly.

h. Uniform hazardous manifests and other appropriate documentation (e.g. Land Disposal Restriction) are utilized for all hazardous waste shipments.

i. Annual PCB Logs and other documentation required by TSCA is maintained. PCB wastes are disposed of within a year of generation.

j. All applicable managers, supervisors, and employees receive environmental compliance and general awareness hazardous waste training as well as hazardous waste procedures specific to their jobs.

All hazardous wastes are stored at or near the point of generation in approved containers until they are full or collected during collection. Containers becoming close to full prior to scheduled pickup are reported to the site EHS Office and scheduled for an earlier pickup. All wastes are logged and consolidated in the designated hazardous waste storage area. The weights of all collected wastes are electronically recorded to show compliance with generation limits.

9.5 Hazardous Waste Shipment

SENSE contracts only licensed hazardous waste haulers for disposal of hazardous waste to licensed, EPA-approved hazardous waste disposal facilities. SENSE has requested written authorization from GSFC Code 250 Medical and Environmental Management Division for designation of SENSE personnel to sign hazardous waste manifests at SENSE locations. A copy of this authorization is electronically filed in the site shared drives.

Individuals signing manifests will receive appropriate hazardous waste and Department of Transportation (DOT) hazardous materials training prior to signing manifests and shipping hazardous waste. All manifests are reviewed and compared to wastes being shipped to ensure compliance with applicable regulations prior to signature. Prior to shipments, the disposal facilities and advance copies of the manifest are sent to the Code 250 Medical and Environmental Management Division for review and concurrence.

A copy of all hazardous waste shipments and completed GSFC Manifest Tracking Sheets are provided to the GSFC Code 250 and records electronically filed in the site shared drives.

Although not an everyday occurrence, SENSE logistics does have to perform hazardous material shipments occasionally. Examples of these shipments include equipment containing cesium clocks and lithium batteries. A hazmat employee, defined as "*an individual who (i.) Loads, unloads or handles hazmat;(ii) Prepares hazmat for transportation; (iii) Is responsible for safety of transporting hazmat; (iv) Operates a vehicle used to transport hazmat",* must complete general awareness/familiarization training, function-specific training, safety training, and security awareness training, in accordance with 49 CFR 172.704. Individuals performing these tasks at SENSE locations must complete this training within 90 days of employment and every three years. In addition, any person shipping hazardous materials by air must complete the International Air Transportation Association (IATA) Dangerous Goods training at least every two years. These training records are maintained in the SENSE LMS.

Shipping hazardous materials also requires the shipper to have knowledgeable persons available to provide information should an emergency event occur during shipment of the hazardous material. SENSE contracts with third party emergency management companies for calls involving emergencies with hazardous shipments while in transit. The DOT requires shippers to maintain records of hazardous material shipments, Bills of Lading and other shipping paperwork for a period of at least one year, per 49 CFR 177.817(f). IATA requires the shipper to retain a copy of the Shipper's Declaration for Dangerous Goods and additional documentation and information for a minimum of three months. SENSE locations maintain a copy of these records to ensure compliance with these requirements.

9.5.1 Waste Minimization

SENSE takes every effort to eliminate the use of hazardous materials or reduce the volume of hazardous materials generated to support SENSE operations and processes. Current waste streams are consistently evaluated for effective ways to utilize substitute materials or minimize number of hazardous byproducts without impacting the SENSE mission. In addition, all proposed projects and changes in operations are carefully evaluated for the generation of hazardous waste byproducts through the *Environment, Health and Safety Project Review (EHSPR)* checklist procedure, (SENSE-PMO-PROC-050).

9.6 Universal Waste Management

Universal wastes are wastes that meet hazardous waste criteria, but because they pose a relatively low risk compared to other hazardous wastes, are exempt from regulation as hazardous waste if managed under the universal waste requirements. SENSE sites generate universal waste, including but not limited to fluorescent lamps and batteries.

Universal wastes generated onsite are managed by the following:

a. Containers are stored to prevent breakage and releases to the environment.
b. Containers of universal waste are kept closed.
c. Any universal wastes that show evidence of leakage or damage are immediately contained and transferred to an appropriate container.
d. Waste-specific containers and packaging requirements are met.
e. Containers are labelled and marked in accordance with universal waste requirements.

f. Universal wastes are accumulated for no longer than one year.

g. Employees handling universal waste are familiar with proper handling and emergency procedures, relative to their responsibilities.

Like hazardous waste, only haulers licensed to transport universal waste are contracted to ship universal wastes to licensed, EPA approved Treatment, Storage, and Disposal Facilities (TSDF) to accept these waste streams. Individuals signing hazardous waste manifests will also review and sign universal waste shipments. Records of these shipments will be provided to GSFC Code 250 and records maintained in the site shared drive. SENSE will also provide the amount of waste recycled per universal waste stream annually to meet NASA reporting requirements.

9.7 Asbestos Management

SENSE has conducted surveys in the past to evaluate the facilities for the presence of asbestos. Asbestos has been identified at some SENSE sites. If asbestos related material must be disposed of at a SENSE location, a licensed contractor for removal will be hired. An Asbestos Abatement Plan will be submitted to GSFC Code 250 and Code 360 for review prior to work being initiated for any project where exposures will exceed National Emission Standards for Hazardous Air Pollutants (NESHAP) levels. Code 360 is responsible for approving the Plan.

9.8 Polychlorinated Biphenyls

SENSE locations will prepare an annual polychlorinated biphenyls (PCB) report for file, by July 1 of each calendar year, listing the following PCB activities for the prior year: facility name, calendar year, signed manifests, certificates of disposal, weight of PCB wastes, serial number, or other identification number, date removed from service, date of transport, date of disposal, and records of conversations to confirm the receipt of PCB wastes.

9.9 Emergency Planning and Community Right-to-Know Act

Inventory is taken every year at SENSE locations to determine if chemicals onsite reach their reporting thresholds under the Emergency Planning and Community Right-to-Know Act (EPCRA) for Tier II reporting. Reporting includes chemicals such as: diesel fuel from underground storage tanks (UST) and sulfuric acid and lead from battery storage at the Uninterruptable Power Supply (UPS) locations, which exceed the Superfund Amendments and Reauthorization Act (SARA) Title III Tier II reporting quantities. The Emergency and Hazardous Chemical Inventory is signed by the site leader, copied to Code 250, and submitted annually to the states and emergency management organizations by March 1st. A copy of the inventory is also provided to the local fire departments each year. The Local Emergency Planning Commissions (LEPC) receive a copy of the Tier II reports as well. Copies of the records are electronically filed in the shared drives at each site where applicable.

For hosted sites, the host is responsible for submitting the Tier II reports when the EPCRA reporting requirements are located inside the host site boundaries. In these cases, SENSE performs an annual inventory of the batteries, diesel fuel, and other chemicals as applicable and sends this information to the host. The host is then responsible for submitting the annual Tier II report to the proper recipients per state regulations. SENSE maintains a copy of the inventories provided to the host.

Abbreviations and Acronyms

Acronym	Definition
ACCESS	Advanced Communications Capabilities for Exploration and Science Systems
ACM	Asbestos-containing Material
AST	Above-ground Storage Tank
ASTM	American Society for Testing and Materials
CBT	Computer Based Training
CFR	Code of Federal Regulations
CRB	Configuration Review Board
DCN	Documentation Change Notice
DM	Data Management
DOT	Department of Transportation
DRD	Data Requirement Description
DTE	Direct-to-Earth
EA	Environmental Assessment
EHS	Environment, Health and Safety
EHSPR	Environment, Health and Safety Project Review
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EMS	Environmental Management System
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right to Know
EPDRP	Emergency Preparedness and Disaster Recovery Plan
ESC	Exploration and Space Communications Projects Division
ESTL	Electronic Systems Test Laboratory
ETGT	Extended TDRS Ground Terminal
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act

Acronym	Definition
GOCO	Government-Owned Contractor-Operated
GPD	Goddard Policy Directive
GPR	Goddard Procedural Requirements
GSFC	Goddard Space Flight Center
IATA	International Air Transport Association
IDIQ	Indefinite Delivery, Indefinite Quantity
LEPC	Local Emergency Planning Commission
LMS	Learning Management System
MAN	Manual
NASA	National Aeronautics and Space Administration
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NMED	New Mexico Environment Department
NPDES	National Pollution Discharge Elimination System
NPR	NASA Procedural Requirements
NSN	Near Space Network
PCB	Polychlorinated Biphenyls
PM	Program Manager
PMO	Program Management Office
RAIL	Rolling Action Item List
RCRA	Resource Conservation and Recovery Act
SARA	Superfund Amendments and Reauthorization Act
SCaN	Space Communications and Navigation
SDWA	Safe Drinking Water Act
SENSE	Space Exploration Network Services and Evolution
SLR	Satellite Laser Ranging
SMART	Specific, Measurable, Achievable, Realistic, Timely
SOP	Standard Operating Procedure
SPCC	Spill Prevention, Control, and Countermeasure

Acronym	Definition
SR	Space Relay
STGT	Second TDRSS Ground Terminal
TDRS	Tracking and Data Relay Satellite
TSCA	Toxic Substance Control Act
TSDF	Treatment, Storage, and Disposal Facilities
UL	Underwriters Laboratories
UPS	Uninterruptable Power Supply
UST	Underground Storage Tank
VLBI	Very Long Baseline Interferometry
WSC	White Sands Complex
WSGT	White Sands Ground Terminal
WSTF	White Sands Test Facility