



Certified Mail - Return Receipt Requested

February 21, 2022

Tim Davis
Chief Environmental Officer
National Aeronautics and Space Administration
White Sands Test Facility
P.O. Box 20
Las Cruces, NM 88004-0020

Attention of: RE-21-125

**RE: APPROVAL WITH MODIFICATIONS
NASA WSTF PERIODIC MONITORING REPORT SECOND QUARTER 2021
NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
JOHNSON SPACE CENTER WHITE SANDS TEST FACILITY
DOÑA ANA COUNTY, NEW MEXICO
EPA ID #NM08800019434
HWB-NASA-21-012**

Dear Mr. Davis:

The New Mexico Environment Department (NMED) has received the National Aeronautics and Space Administration Johnson Space Center White Sands Test Facility (Permittee) *NASA WSTF Periodic Monitoring Report – Second Quarter 2021* (PMR), dated July 28, 2021. NMED has completed review of the PMR and hereby issues this Approval with the following modifications.

MODIFICATIONS

1. Section 6.0, Discussion and Conclusions, Page 11

Permittee Statement: "For per- and polyfluoroalkyl- substances [PFAS], all detections are noted as there are no regulatory cleanup levels or maximum contaminant levels with which to compare."

NMED Comment: Groundwater sampling and evaluation of PFAS contaminants of concern was not completed during, nor required for, the 2021 second quarter event. Remove the

statement from the PMR. Revise the PMR and provide a replacement page. In addition, note that NMED's November 2021 *Risk Assessment Guidance for Site Investigations and Remediation, Volume I*, (RA Guidance) contains screening levels for groundwater (i.e., RA Guidance, Table A-1, tap water screening levels).

2. Section 6.2.2, Plume Front Treatment System [PFTS], Page 13

Permittee Statement: "The PFTS effluent met all DP-1255 discharge limits and Permit cleanup levels."

NMED Comment: The PFTS effluent sample collected in April 2021 exceeded the cleanup level for N-nitrosodimethylamine (NDMA). Revise the PMR for accuracy and provide replacement pages.

3. Table 6.1, Status of Wells with Sampling Issues, Pages 57 and 58

NMED Comment: The following issues must be addressed as follows:

- a. The use of no-purge passive sampling techniques or technology is not appropriate for collection of groundwater samples at monitoring well 200-LV-150 or any groundwater monitoring wells at White Sands Test Facility. The reference to sampling with a HydraSleeve sampler at 200-LV-150 must be removed from the table. Revise the table accordingly and provide a replacement page.
- b. Information provided for monitoring wells 400-C-143, PL-3-453, 400-C-118, 300-C-128, and BLM-1-435 indicates a decline in groundwater levels for the wells that has not allowed for groundwater sampling. The Permittee may continue to evaluate and report observed well conditions in PMRs; however, as information and data allow, the issues observed at the sampling locations must be further addressed in the 2022 update to the White Sands Test Facility (WSTF) Groundwater Monitoring Plan (2022 Plan). The 2022 Plan must include recommendations for replacement of these monitoring wells, which are critical to characterization of the nature and extent of contaminants of concern in groundwater at WSTF. No revisions to the PMR are required in response to this comment.

The Permittee must provide replacement pages that address NMED's modifications to the PMR. In addition, a response letter that cross-references where the modifications were addressed in the PMR must be provided. The response letter must also be provided as an electronic copy. Electronic copies of the redline-strikeout version of the PMR showing where all changes were made to the PMR and the revised PMR must be submitted to NMED no later than **April 15, 2022**.

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This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

If you have any questions regarding this letter, please contact Gabriel Acevedo at (505) 690-5760.

Sincerely,

Rick Shean

Digitally signed by Rick
Shean
Date: 2022.02.21
14:08:17 -07'00'

Rick Shean
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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File: NASA 2022 and Reading

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