



**Certified Mail - Return Receipt Requested**

May 2, 2023

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-21-113

**RE: APPROVAL WITH MODIFICATIONS  
400 AREA SUPPLEMENTAL GROUNDWATER AND SOIL VAPOR MONITORING PLAN  
NATIONAL AERONAUTICS AND SPACE ADMINISTRATION  
JOHNSON SPACE CENTER WHITE SANDS TEST FACILITY  
DOÑA ANA COUNTY, NEW MEXICO  
EPA ID #NM08800019434  
HWB-NASA-19-011**

Dear Mr. Davis:

The New Mexico Environment Department (NMED) has received the National Aeronautics and Space Administration (NASA) Johnson Space Center White Sands Test Facility (WSTF) (Permittee) *400 Area Supplemental Groundwater and Soil Vapor Monitoring Plan (Work Plan)*, dated July 14, 2021. NMED has completed review of the Work Plan and hereby issues this Approval with the following modifications.

**MODIFICATIONS**

**1. Section 4.2, Groundwater Sampling, Page 3**

**NMED Comment:** Revise the Work Plan to address abandonment of the groundwater monitoring components of wells 400-KV-142 and 400-LV-125 due to dry well conditions and provide all necessary Work Plan replacement pages.

## 2. Section 5.1, Groundwater and Soil Vapor Sampling, Page 4

**Permittee Statement:** “400 Area MSVGM wells are currently scheduled for quarterly groundwater sampling in accordance with the NMED-approved GMP. NASA plans to maintain this sampling schedule and collect soil vapor samples from MSVGM [multiport soil vapor and groundwater monitoring] and MSVM [multiport vapor monitoring] wells in conjunction with ongoing groundwater sampling which is currently scheduled for the months of February, May, August, and November.

**NMED Comment:** Update the statement to address the current NMED-approved semiannual groundwater sampling schedule for 400 Area Closure monitoring wells per the 2022 WSTF Groundwater Monitoring Plan, to propose quarterly sampling required for this project for the proposed sampling year, and to update the sampling schedule, as necessary. Revise the Work Plan accordingly and provide a replacement page.

## 3. Section 5.2, Reporting, Page 4

**NMED Comment:** The following comments must be addressed:

- a. In addition to data proposed for collection under this work plan, the volatile organic compounds (VOCs) trend analysis must also include data collected during the 400 Area Closure investigation (soil vapor and groundwater) and the periodic groundwater monitoring. Revise the Work Plan to address this comment and provide replacement pages.
- b. In addition to the proposed VOCs concentration trend analysis, each quarterly report must also include a groundwater concentration trend analysis evaluation for N-nitrosodimethylamine (NDMA). The trend analysis for NDMA must include groundwater analytical data reported for the 400 Area Closure investigation and subsequent periodic groundwater monitoring and must be updated as additional data becomes available during the course of this project. Revise the Work Plan to address this comment and provide a replacement page(s).
- c. Each quarterly report for this project must include representative figures, tables, and graphs, as well as a trend analyses discussion. Revise the Work Plan to address this comment and provide replacement pages.
- d. Update the quarterly monitoring report submittal schedule as necessary and provide replacement pages.

The Permittee must provide replacement pages that address each of NMED’s modifications. In addition, a response letter that cross-references where each of the modifications were addressed must be provided. The response letter must also be provided as an electronic copy. Electronic

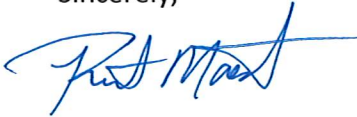
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copies of the revised Work Plan and a redline-strikeout version of the Work Plan showing where all changes were made must be submitted to NMED no later than **July 31, 2023**.

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,

A handwritten signature in blue ink, appearing to read "Ricardo Maestas".

Ricardo Maestas  
Acting Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
B. Wear, NMED HWB  
G. Acevedo, NMED HWB  
L. King, EPA Region 6 (GLCRRC)  
A. Sanchez, NASA WSTF

File: NASA 2023 and Reading

