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-21-123

RE: APPROVAL WITH MODIFICATIONS
400 AREA CLOSURE INVESTIGATION REPORT - REVISION 3
NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
JOHNSON SPACE CENTER WHITE SANDS TEST FACILITY
DOÑA ANA COUNTY, NEW MEXICO
EPA ID #NM08800019434
HWB-NASA-21-014

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) *400 Area Closure Investigation Report - Revision 3* (Report), dated July 27, 2021. NMED has completed review of the Report and hereby issues this Approval with the following modifications.

MODIFICATIONS

1. **Section 9.9.2, Soil Vapor Analytical Result Above Laboratory Detection Limits, Page 46**

   Permittee Comment: "Only two of the COPCs [contaminants of potential concern] had maximum detected concentrations that exceeded the equivalent NMED VISL [vapor intrusion screening level]: chloroform (maximum 130 µg/m^3 [micrograms per cubic meter], VISL 25.3 µg/m^3) and Freon 21 (19,000 µg/m^3, VISL 3,480 µg/m^3)."

   NMED Comment: The chloroform VISL is not accurate. The chloroform VISL, as provided in NMED's *Risk Assessment Guidance for Site Investigations and Remediation*, Table A.4, is 40.7 µg/m^3. Revise the statement for accuracy and provide a replacement page.

2. **Figure 9.2, 400 Area Groundwater Analytical Results above WSTF GMP Cleanup Levels, Page 82**

   NMED Comment: A data reporting discrepancy was noted for the arsenic concentration (7.70E+03 micrograms per liter (µg/L)) for monitoring well 400-IV-123. The concentration data reported in Section 9.6.3.3, Metals, indicates a concentration of 7.7 µg/L for the groundwater sample location. Resolve the discrepancy and provide a revised Figure 9.2.

3. **Table 7.5, 400 Area Groundwater Analytical Results above WSTF Cleanup-Screening Levels, Pages 103 and 104**

   NMED Comment: A data reporting discrepancy was noted for the N-nitrosodimethylamine concentration (77 µg/L) listed for monitoring well 400-HV-147. Section 9.6.3.3, SVOCs [semivolatile organic compounds] information indicates a concentration of 66 µg/L for monitoring well 400-HV-147. Resolve the discrepancy and provide a replacement table.

The Permittee must provide replacement pages that address each of NMED's required modifications. In addition, a response letter that cross-references where the modifications were addressed must be provided. The response letter must also be provided as an electronic copy. Electronic copies of the revised Report and the redline-strikeout version of the Report 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,

Ricardo Maestas
Acting Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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File: NASA 2023 and Reading

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