

National Aeronautics and
Space Administration

Lyndon B. Johnson Space Center
White Sands Test Facility
P.O. Box 20
Las Cruces, NM 88004-0020



November 24, 2014

Reply to Attn of: RE-14-128

Mr. John E. Kieling, Chief
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

Subject: Request for Variance from Groundwater Sampling Schedule

The groundwater sampling schedule at WSTF has been negatively impacted by unexpected resource limitations imposed by the demands for personnel of multiple past and ongoing field projects. In July and August 2014, three and four groundwater sampling events, respectively, were rescheduled to the following month. Although the rescheduled sampling events were performed within 30 days of their originally scheduled sampling date, NASA notified NMED of the delay in the July and August 2014 Environmental Activity Reports, in accordance with Section 11.2 of the Groundwater Monitoring Plan. In September 2014, NASA was unable to complete nine scheduled groundwater sampling events. These events were reported in the September 2014 Environmental Activity Report and rescheduled for October 2014. However, four of these events were not performed in October 2014. NASA notified NMED of this unforeseen delay of greater than 30 days in the October 2014 Environmental Activity Report. NASA also indicated in these reports that the impact of these projects on groundwater sampling is likely to continue into the future.

NASA believes that continued delays in the groundwater sampling schedule will continue to occur because of lingering resource limitations. Section 11.2 of the Groundwater Monitoring Plan requires NASA to request a variance if a groundwater monitoring well or zone cannot be sampled within 30 days of its scheduled sampling event. NASA is hereby notifying NMED that some groundwater monitoring wells or zones scheduled for sampling in November and December 2014 may not be sampled within 30 days of their scheduled sampling date. NASA requests a variance from the established groundwater sampling schedule for the monitoring wells or zones identified in the tables in Enclosure 1, which provide the current sampling schedules for November and December 2014. NASA anticipates the dedication of additional personnel to groundwater sampling activities and expects to regain the sampling schedule (within the 30 day limitations) by January 2015. These delays in groundwater sampling are not expected to negatively impact the overall objectives of the groundwater monitoring program, or interfere with the collection of samples from groundwater remediation system influent, effluent, and operational extraction wells.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for known violations.

If you have any questions or comments concerning this submittal, please contact Mike Zigmund at 575-524-5484.



for Radel Bunker-Farrar
Chief, Environmental Office

Enclosure

cc:

Mr. Dan Comeau
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

November and December Groundwater Sampling Schedules

| November 2014 | |
|---------------|------------|
| Well ID | Due Date |
| 200-B-240 | 11/1/2014 |
| BLM-24-565 | 11/1/2014 |
| BLM-26-404 | 11/1/2014 |
| BLM-36-610 | 11/1/2014 |
| 200-F-370 | 11/2/2014 |
| 200-F-225 | 11/4/2014 |
| 200-F-420 | 11/4/2014 |
| 300-E-183 | 11/5/2014 |
| BLM-36-860 | 11/5/2014 |
| NASA 6 | 11/5/2014 |
| BLM-3-182 | 11/6/2014 |
| BLM-36-800 | 11/6/2014 |
| ST-1-473 | 11/6/2014 |
| BLM-14-327 | 11/7/2014 |
| BLM-17-493 | 11/7/2014 |
| BLM-36-350 | 11/7/2014 |
| BLM-17-550 | 11/8/2014 |
| BLM-8-418 | 11/8/2014 |
| BW-5-295 | 11/8/2014 |
| BLM-38-620 | 11/12/2014 |
| 300-E-138 | 11/13/2014 |
| BLM-22-570 | 11/13/2014 |
| BLM-38-480 | 11/13/2014 |

| November 2014 | |
|---------------|------------|
| Well ID | Due Date |
| ST-1-630 | 11/13/2014 |
| 100-C-365 | 11/14/2014 |
| 200-I-795 | 11/16/2014 |
| ST-6-575 | 11/16/2014 |
| BLM-2-482 | 11/17/2014 |
| 200-I-675 | 11/18/2014 |
| 700-B-510 | 11/18/2014 |
| BLM-6-488 | 11/18/2014 |
| 100-D-176 | 11/19/2014 |
| 200-I-375 | 11/19/2014 |
| 200-I-490 | 11/19/2014 |
| WB-1-200 | 11/19/2014 |
| 200-I-185 | 11/20/2014 |
| 200-I-300 | 11/20/2014 |
| PL-7-480 | 11/20/2014 |
| PL-7-560 | 11/20/2014 |
| ST-5-655 | 11/26/2014 |
| ST-6-535 | 11/26/2014 |
| 300-A-120 | 11/27/2014 |
| ST-5-485 | 11/28/2014 |
| 300-A-170 | 11/29/2014 |
| JP-3-509 | 11/29/2014 |

December 2014

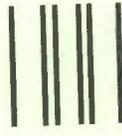
| Well ID | Due Date |
|----------------|-----------------|
| ST-3-586 | 12/3/2014 |
| PL-2-504 | 12/4/2014 |
| PL-3-453 | 12/4/2014 |
| ST-3-486 | 12/4/2014 |
| BLM-7-509 | 12/5/2014 |
| ST-3-666 | 12/5/2014 |
| ST-3-735 | 12/5/2014 |
| WW-5-582 | 12/5/2014 |
| BLM-27-270 | 12/6/2014 |
| WW-2-489 | 12/8/2014 |
| WW-2-664 | 12/8/2014 |
| WW-4-594 | 12/8/2014 |
| WW-5-464 | 12/8/2014 |
| WW-1-452 | 12/9/2014 |
| WW-3-569 | 12/9/2014 |
| WW-4-423 | 12/9/2014 |
| 200-G-420 | 12/10/2014 |
| 200-G-495 | 12/10/2014 |
| PL-4-464 | 12/10/2014 |
| WW-3-469 | 12/10/2014 |
| 200-G-220 | 12/11/2014 |
| 200-G-340 | 12/11/2014 |
| BW-7-211 | 12/11/2014 |
| 200-G-175 | 12/12/2014 |
| BLM-15-305 | 12/16/2014 |
| ST-4-589 | 12/24/2014 |
| ST-4-481 | 12/25/2014 |
| BLM-40-517 | 12/27/2014 |
| ST-4-690 | 12/27/2014 |

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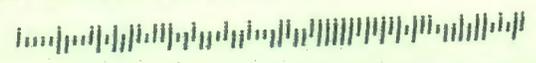


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Space Administration

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Hazardous Waste Bureau
Attn: Mr. Dan Comeau
New Mexico Environmental Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

2. Article Number

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