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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 15, 2015

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

Attention of: RE-15-037

**RE: APPROVAL WITH MODIFICATIONS
600 AREA PERCHED GROUNDWATER EXTRACTION PILOT TEST
INTERIM STATUS REPORT – PROJECT YEAR 2
NATIONAL AERONAUTICS SPACE ADMINISTRATION (NASA)
JOHNSON SPACE CENTER (JSC) WHITE SANDS TEST FACILITY (WSTF)
DOÑA ANA COUNTY, NEW MEXICO
EPA ID #NM08800019434
NASA-15-004**

Dear Mr. Davis:

The New Mexico Environment Department (NMED) has received the *600-Area Perched Groundwater Extraction Pilot Test Interim Status Report, Project Year 2* (Report), dated April 28, 2015 and received April 30, 2015 from NASA WSTF (Permittee). NMED has completed its review of the Report and hereby issues this approval with the following modifications.

Comments:

1. Permittee Statement - Section 4.0 Conclusions and Recommendations, page 4. “The relatively consistent thickness of perched groundwater and concentrations of nitrate/nitrite in samples from 600-G-138 (Table 3.3 and Table 3.4) indicate that the nearby 600 Area wastewater

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lagoons may continue to influence perched groundwater in the area.”

NMED Comment:

In order to substantiate these statements future reports must include the nitrate/nitrite water sample data from the lagoon. In addition, it is not known whether the perched zone is influenced by the lagoons, include a potentiometric map in the area of the lagoons and monitoring wells in future Reports.

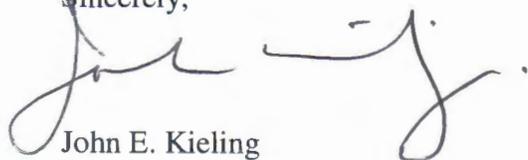
2. Permittee Statement - Section 4.0 Conclusions and Recommendation page 4 and Tables 3.5 and 3.6 Summary of Soil Vapor Chemical Analytical Results. “Furthermore, the chemical analytical data presented in Section 3.2 indicate that the extraction of groundwater does not appear to impact contaminant concentrations in the groundwater or in soil vapor in the vadose zone beneath the Closure.”

NMED Comment:

The soil vapor data listed in Table 3.5 and 3.6 indicate a decreasing trend from project year 1 to project year 2 in concentrations of contaminants of concern (COC). This may or may not be related to the extraction from monitoring well 600-G-138. The Permittee has proposed to continue to extract from one more year in order to evaluate the influence from the lagoons to groundwater. However, further investigation as to the source of contamination is warranted. Therefore, the Permittee must submit a Work Plan in order to evaluate for a potential source of contamination. The Work Plan must be submitted to NMED on or before **December 31, 2015**.

If you have any questions regarding this Approval with Modification, please contact Vicky Baca at (505) 476-6059.

Sincerely,



John E. Kieling
Chief

Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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HWB 3391

New Mexico Environment Department
Hazardous Waste Bureau
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