

National Aeronautics and
Space Administration

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



November 17, 2015

Reply to Attn of: RE-15-123

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

Subject: Transmittal of Class 1 Permit Modification Request for the NASA White Sands
Test Facility (WSTF) Hazardous Waste Permit No. NM8800019434 Attachment 16

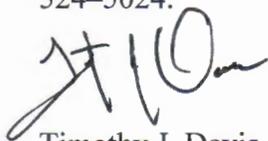
This letter transmits a Class 1 permit modification request to the New Mexico Environment Department (NMED) Hazardous Waste Bureau. An amendment to the Hazardous Waste Permit (Permit) is provided which requires notification to NMED as stated in 40 CFR §270.42(a)(i-iii) (*Permit modification at the request of the permittee*). These changes represent a Class 1 Permit Modification as indicated in 40 CFR §270.42, Appendix I, A.5. The National Aeronautics and Space Administration (NASA) requests that NMED provide an invoice with the applicable review fee in accordance with the New Mexico Administrative Code (NMAC) Hazardous Waste Permit and Corrective Action Fee Regulations, 20.4.2.201.B(2) and review the submittal after the appropriate fees have been received.

This permit modification is in accordance with Title 20, Chapter 4, Part 1 (20.4.1.900 NMAC). NASA has modified Permit Attachment 16 by updating the submittal date for Investigation Work Plan (IWP) for SWMU 47 (500 Area Fuel Storage) from "6/30/2011" to "60 days before closure" and for SWMU 49 (700 Area Landfill) from "12/30/2015" to "12/29/2017." The investigation for SWMU 47 was discussed with NMED as part of the submittal, review, disapproval, and subsequent resubmittal of the 400 Area IWP (approved by NMED on November 8, 2011). During those discussions, NMED recommended that NASA request to defer investigation of SWMU 47 until the area is no longer in use. Use of the area continues, and NASA proposes to defer investigation as recommended by NMED. SWMU 49 is currently being evaluated in accordance with a Post-Closure Care (PCC) monitoring plan approved by the NMED Solid Waste Bureau, which commenced on August 14, 1998 and continues through August 14, 2028. Additional time for the submittal of the IWP is requested for the following: in excess of 12 years remain under the current NMED PCC monitoring period for SWMU 49; the evaluation of all potential options for SWMU 49 are currently ongoing; and, several alternate field investigations are currently in progress at WSTF for other Permit-identified SWMUs.

Enclosure 1 provides a redline/strikeout, paper copy of the revised Permit Attachment 16. Enclosure 2 provides a clean copy of the revised Permit Attachment 16. Enclosure 3 provides a CD-ROM containing an electronic copy of the revised Attachment 16 as an Adobe PDF file.

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 me at 575-524-5024.



Timothy J. Davis
Chief, Environmental Office

3 Enclosures

cc:

Ms. Kristen Van Horn
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

ENCLOSURE 1

Redline/Strikeout Version of
NASA WSTF Hazardous Waste Permit Attachment 16

**ATTACHMENT 16
 INVESTIGATION WORK PLAN SUBMITTAL SCHEDULE**

Release assessment for regulated units	30 days post-discovery
WP for ETU Leak Detection Wells or ETU Close-out WP	30 days post-permit issuance (Contingent on NASA's ETU plans)
Provide list of wells w/in 3 miles of west and south Outer Boundaries	30 days post-permit issuance
Interim Measure WP (for well sampling)	90 days post-permit issuance
Provide most recent Community Relations Plan	90 days post-permit issuance
Facility-Wide GW Monitoring Plan	180 days post-permit issuance
Annual updates for the Facility-Wide GW Monitoring Plan	April 1 of each year beginning second year after effective date of permit
PFTS WP	180 days post-permit issuance
Annual updates for PFTS WP	August 1 of each year beginning second year after effective date of permit
SWMU 3 – 100 Area Container Storage Area	June 30, 2014
SWMU 11 – 300 Area TO Burner	60 days before closure
SWMU 12 – 400 Area TO Burner	60 days before closure
SWMU 33 – 300 Area Test Stand and 302 Cooling Water Pond	60 days before closure
SWMU 2 – 100 Area Sewage Lagoon	90 days before closure
SWMU 8 – 200 Area Sewage Lagoon	90 days before closure
SWMU 48 – 400 Area Salt Ponds	90 days before closure
SWMU 34 – 600 Area Sewage Overflow Lagoon	90 days before closure
600 Area IWP	6/30/2008

300 Area IWP	12/30/2009
SWMU 13 – 400 Area Aspirator discharge pipe	6/30/2011
400 Area IWP	6/30/2011
SWMU 47 – 500 Area Fuel Storage	6/30/2011 <u>60 days before closure</u>
200 Area IWP	6/30/2012
SWMUs 21-27	6/30/2013
AOC 51 – 2 nd TDRSS sewage lagoon	60 days before closure
AOC 52 – 2 nd TDRSS UST	60 days before closure
SWMU 1 – 100 Area Burn Pit	6/30/2014
SWMUs 4-7 – 200 Area Discharge Pipes	6/30/2014
SWMU 9 – 200 Area Burn Pit	6/30/2014
SWMU 15 – 600 Area Burn Pit	6/30/2014
SWMUs 29-31 – Small Arms Ranges	12/30/2014
AOC 53 – Active firing range	60 days before closure
SWMU 16 – 600 Area BLM Off-site Pile	12/30/2014
SWMU 14 – 600 Area JP4 Remove Test Site	12/30/2014
SWMU 10 – 200 Area HWTL	6/30/2015
SWMU 18 – 700 Area High Energy Blast Facility	60 days before closure
SWMU 19 – 800 Area UST	6/30/2015
SWMU 20 – 800 Area TOx	60 days before closure
SWMU 49 – 700 Area Landfill	12/30/2015 <u>12/29/2017</u>
SWMU 50 – 1 st TDRSS Diesel Release	6/30/2016

ENCLOSURE 2

Final Version of
NASA WSTF Hazardous Waste Permit Attachment 16

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SWMU 9 – 200 Area Burn Pit	6/30/2014
SWMU 15 – 600 Area Burn Pit	6/30/2014
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AOC 53 – Active firing range	60 days before closure
SWMU 16 – 600 Area BLM Off-site Pile	12/30/2014
SWMU 14 – 600 Area JP4 Remove Test Site	12/30/2014
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SWMU 18 – 700 Area High Energy Blast Facility	60 days before closure
SWMU 19 – 800 Area UST	6/30/2015
SWMU 20 – 800 Area TOx	60 days before closure
SWMU 49 – 700 Area Landfill	12/29/2017
SWMU 50 – 1 st TDRSS Diesel Release	6/30/2016

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1. Article Addressed to:

Ms. Kristen Van Horn
 Hazardous Waste Bureau
 New Mexico Environmental Dept
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, NM 87505

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x Matthew Lopez

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