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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 11, 2016

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-15-127

**RE: ADDITIONAL WORK PLAN REQUIREMENT TO EVALUATE POTENTIAL
SOURCE OF 600 AREA CONTAMINATION
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 letter response *Additional Work Plan Requirement to Evaluate Potential Source of 600 Area Contamination (Response)*, dated November 25, 2015 and received November 30, 2015 from the National Aeronautics and Space Administration (NASA) White Sands Test Facility (WSTF) (Permittee). NMED has completed its review of the letter and provides the following comments.

Comments:

1. 200/600 Vapor Migration Assessment

NMED Comment: In keeping with the previous integrated evaluation of vapor migration studies for the 200 and 600 Areas, NMED agrees with inclusion of the 600 Area in the scope of work for the 200 Area quantitative vapor intrusion assessment. Additionally, based on the down-gradient location of the 600 Area from the 200 Area, it is possible that chemical of concern (COC) impacts identified during previous investigations conducted at the 200 Area may be a source of contamination (e.g. soil-vapor and groundwater) at the 600 Area. During data evaluation, COC screening must be conducted in accordance with *NMED Risk Assessment Guidance for Site Investigations and Remediation* (July 2015, or as updated). COC concentrations must be compared to their corresponding NMED vapor intrusion screening levels (VISLs).

2. Additional 600 Area Site Assessment

Permittee's Statement: NASA demonstrated in the investigation reports referenced in Enclosure 1 that the source of soil vapor contaminants beneath and adjacent to the 600 Area HWMU is the underlying groundwater. Based on NMED approvals of these work plans, NASA understands that NMED agrees with this interpretation, although NMED has requested an additional investigation to identify the source.

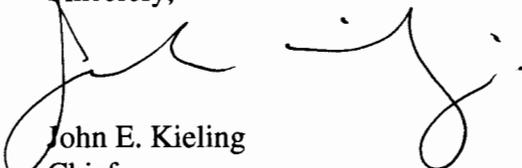
NMED Comment: The Permittee's understanding is inaccurate. NMED approval does not necessarily constitute agreement with the Permittee's interpretation of subsurface conditions at the 600 Area Hazardous Waste Management Unit (HWMU). However, the Permittee must demonstrate that its theory is valid through the collection of accurate characterization data for the perched groundwater zone. The assessment must definitively identify the source, as well as the migration pathway of perched groundwater at the 600 Area HWMU, as required in NMED's July 15, 2015, Approval with Modifications letter for the *Perched Groundwater Extraction Pilot Test Interim Status Report- Project Year 2*. The investigation must include a refinement of subsurface geology at the 600 Area, including reevaluation of all relevant well log information; development of geologic cross sections; installation of additional soil borings to bedrock which will serve to confirm any leakage of waste water from the 600 Area lagoons or an up-gradient perched groundwater source, and if deemed necessary, an expansion of subsurface geophysical data (e.g. an east-west transect) collected for the 600 Area in conjunction with the 200 Area Phase I RCRA Facility Investigation. Should perched groundwater be confirmed in any of the borings, the borings must be completed as permanent monitoring wells, and the wells must be sampled for previously identified 600 Area COCs. A potentiometric surface map depicting up-gradient and down-gradient migration of perched groundwater elevations must also be provided in the assessment. The findings of the required investigation will help determine if additional remediation is necessary at the 600 Area HWMU.

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A work plan for the required 600 Area perched groundwater zone investigation must be submitted no later than **June 30, 2016**.

If you have any questions regarding this direction to proceed, please contact Gabriel Acevedo at (505) 476-6043.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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HWB 3391

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NASA

