June 15, 2021

Reply to Attn of: RE-21-095

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

Subject: NASA White Sands Test Facility (WSTF) Monthly Environmental Activity Report for May 2021

Enclosed is the NASA White Sands Test Facility (WSTF) Monthly Environmental Activity Report for May 2021. This reporting format includes an Executive Summary that provides important events/observations as Enclosure 1, a paper copy of the report as Enclosure 2, and a CD-ROM with the report in PDF as Enclosure 3.

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 knowing violations.

If you have any questions or comments concerning this submittal, please contact Amanda Skarsgard at 575-571-9668.

TIMOTHY DAVIS
Digitally signed by TIMOTHY DAVIS
Date: 2021.06.15
09:10:05 -06'00'

Timothy J. Davis
Chief, Environmental Office

3 Enclosures
cc: 
Mr. Gabriel Acevedo 
Hazardous Waste Bureau 
New Mexico Environment Department 
2905 Rodeo Park Drive East, Building 1 
Santa Fe, NM 87505
Executive Summary

The following summarizes important information associated with NASA White Sands Test Facility (WSTF) environmental program activities in May 2021:

- NASA did not require any waste shipments in May 2021.
- NASA operated the Plume Front Treatment System on 30 of 31 days in May 2021 and treated 94.3 acre-feet of contaminated groundwater.
- NASA operated the Mid-plume Interception and Treatment System on 31 of 31 days in May 2021 and treated 1.13 acre-feet of contaminated groundwater and 36,540 gallons of investigation-derived waste.
- NASA continued developing the responses to NMED’s disapproval of three documents associated with the 300/400 Area HWMU investigations and one related to the 500 Area Fuel Storage investigation.
- NASA continued planning the work required to address NMED comments on the disapproved investigation report for the 200 Area Hazardous Waste Transmission Lines (SWMU 10).
- NASA received NMED’s approval with modifications of the investigation report for the 600 Area BLM Off-site Soil Pile and began reviewing NMED’s comments.
- NASA addressed NMED comments on the disapproved investigation report for septic tanks (SMWUs 21-27) and submitted the required response and revised report.
- NASA resumed investigation fieldwork at the 700 Area Landfill (SWMU 49).
- NASA continued follow-on investigation work in accordance with the NMED-approved minimum site assessment work plan at the SMWU 52 diesel release.
- NASA continued extraction of perched groundwater at monitoring well 600-G-138. NASA also continued project planning for the additional 600 Area perched groundwater investigation.
- NASA extracted groundwater from five wells as part of the Targeted Mobile Remediation Process Pilot Test initiated in August 2019.
- NASA continued project planning for several monitoring well projects.
- NASA submitted six documents to the NMED Hazardous Waste Bureau in May 2021.
- There were no reportable non-compliance issues in May 2021.
Monthly Environmental Activity Report
May 2021

Report Deadline: June 15, 2021
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 knowing violations.

TIMOTHY DAVIS
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Date: 2021.06.15 09:10:37 -06'00'

Timothy J. Davis
Chief, Environmental Office

See Electronic Signature
Date

National Aeronautics and Space Administration

Johnson Space Center
White Sands Test Facility
12600 NASA Road
Las Cruces, NM 88012
www.nasa.gov/centers/wstf

www.nasa.gov
Executive Summary

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- NASA continued project planning for several monitoring well projects.
- NASA submitted six documents to the NMED Hazardous Waste Bureau in May 2021.
- There were no reportable non-compliance issues in May 2021.
1.0 Waste Management Activities

1.1 NASA did not require any waste shipments in May 2021.

1.2 NMED is reviewing the Response to Approval with Modifications Closure Certification Report for the NASA WSTF FTU (Fuel Treatment Unit) (August 31, 2020).

2.0 Environmental Monitoring

2.1 NASA performed sampling at 32 of 32 groundwater monitoring wells or zones scheduled for sampling in May 2021, in accordance with the approved Groundwater Monitoring Plan (GMP). Previous deviations from the planned sampling schedule are described below and have been reported to NMED in previous monthly reports:

- Wells 400-C-143 and BLM-1-435 (scheduled for sampling in April 2021), well NASA 3 (scheduled for sampling in March 2021), well PL-3-453 (scheduled for sampling in December 2020), wells 400-C-118 and 400-IV-123 (scheduled for sampling in November 2020), and well 300-C-128 (scheduled for sampling in August 2020) cannot be sampled because the water levels are insufficient for sampling. NASA monitors the water levels in these wells and will sample the wells if the water levels recover enough to allow for the collection of representative samples.

- In November 2020, NASA postponed monitoring at groundwater wells ST-1-541 and ST-1-630 because the wells are being used as extraction locations for the ongoing Targeted Mobile Remediation Process Pilot Test and are not equipped with groundwater sampling equipment. In April 2021, NASA removed well ST-1-630 as an extraction location from the ongoing Targeted Mobile Remediation Process Pilot Test and returned the well to the groundwater monitoring network. NASA completed sampling at the well on May 10, 2021 in accordance with the GMP. NASA plans to continue groundwater extraction and monitoring at well ST-1-541 and will collect routine groundwater samples when the well reverts to monitoring status.

- Well NASA 9, scheduled for sampling in October 2020, cannot be sampled because access to the screened interval was prevented by the intrusion of roots into the well casing and screen. NASA is evaluating potential future use of this monitoring well.

- Well 200-LV-150, scheduled for sampling in November 2019, failed to recharge adequately to collect representative groundwater samples. The proposed no-purge sampling method was not approved by NMED, so further evaluation and potential replacement of the well is required.

- Well BLM-28-515, scheduled for sampling in July 2019, cannot be sampled because of sampling system issues described in previous monthly reports. NASA plans to plug and abandon this well (Section 3.18) and removed it from the GMP.

- The Water FLUTe sampling system was removed from well WW-4 to support the collection of groundwater samples in accordance with the Abbreviated Investigation Work Plan Groundwater Data Representativeness Phase 1: Water FLUTe Well Evaluation (July 30, 2019; revised). Routine groundwater sampling required by the GMP is not possible at this time.

2.2 NASA performed other regulatory groundwater sampling requirements as scheduled and as allowed by operational status. NASA did not sample well PFE-1 because it was not operational due to equipment failure.

2.3 NASA developed the June 2021 groundwater sampling schedule and plans to sample 32 groundwater monitoring wells or zones based on GMP requirements.
### 3.0 Corrective Actions/Investigations

#### 3.1 Plume Front Treatment System Operations

<table>
<thead>
<tr>
<th>Shutdown Date</th>
<th>Restart Date</th>
<th>Shutdown Status</th>
<th>Days Operated</th>
<th>Average Flow Rate (gpm)</th>
<th>Volume Extracted/ Treated (acre-feet)</th>
<th>Volume Injected (acre-feet)</th>
<th>Volume Discharged to Grade (acre-feet)</th>
<th>Volume Discharged to Modu-Tank (acre-feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>5/7/21</td>
<td>5/7/21</td>
<td>Unplanned</td>
<td>30 of 31</td>
<td>681</td>
<td>94.3</td>
<td>92.8</td>
<td>1.1</td>
<td>0.43</td>
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<tr>
<td>5/8/21</td>
<td>5/10/21</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5/16/21</td>
<td>5/17/21</td>
<td>Unplanned</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5/27/21</td>
<td>5/27/21</td>
<td>Planned</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5/27/21</td>
<td>5/28/21</td>
<td>Unplanned</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Discussion**

5/7/21: The system shut down automatically because of a communication loss.

5/8/21: They system shut down automatically due to a leak detection alarm caused by condensation in a portion of the extraction well piping.

5/16/21: The system shut down automatically because of communication loss.

5/27/21: NASA shut the system down to replace an optical link coupler at injection well PFI-1.

5/27/21: The system shut down automatically because of a communication loss.

#### 3.2 Mid-plume Interception and Treatment System Operations

<table>
<thead>
<tr>
<th>Shutdown Date</th>
<th>Restart Date</th>
<th>Shutdown Status</th>
<th>Days Operated</th>
<th>Average Flow Rate (gpm)</th>
<th>Volume Extracted and Treated (acre-feet)</th>
<th>Volume of Groundwater Discharged to Infiltration Basin (acre-feet)</th>
<th>Volume of IDW Treated and Discharged to the Infiltration Basin (gallons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>5/5/21</td>
<td>5/5/21</td>
<td>Planned</td>
<td>31 of 31</td>
<td>9.9</td>
<td>1.13</td>
<td>1.27</td>
<td>36,540</td>
</tr>
<tr>
<td>5/11/21</td>
<td>5/11/21</td>
<td>Unplanned</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Discussion**

5/5/21: NASA shut down the system to install a new air flow meter on the air stripper.

5/11/21: The system shut down automatically because of a mechanical fault with low pressure on the air stripper.
3.3 200 Area Investigation

- NMED is reviewing the NMED Disapproval Response for 200 Area and 600 Area Vapor Intrusion Assessment Report (January 30, 2020).

3.4 400 Area

- NASA continued developing the response to NMED’s March 15, 2021 disapproval of the 400 Area Supplemental Groundwater and Soil Vapor Monitoring Plan (5/28/19). The response to NMED’s three comments and the revised monitoring plan are due to NMED no later than July 30, 2021.
- NASA continued developing the response to NMED’s March 19, 2021 disapproval of the 400 Area Closure Investigation Report (12/30/19; revised). The response to NMED’s 17 comments and the revised report are due to NMED no later than July 30, 2021.
- NASA continued developing the response to NMED’s March 19, 2021 disapproval of the 300 Area Supplemental Abbreviated Drilling Work Plan (5/30/19). The response to NMED’s four comments and the revised work plan are due to NMED no later than July 30, 2021.

3.5 600 Area Perched Groundwater Extraction Pilot Test and Investigation

- In May 2021, NASA extracted approximately 191 gallons of perched groundwater from monitoring well 600-G-138 in accordance with NMED’s March 1, 2013 Approval Time Extension for Implementation of the Perched Groundwater Extraction Pilot Test at the 600 Area. Extracted groundwater was containerized for treatment at the MPITS and discharged in accordance with DP-1255.
- NASA continued project planning for the perched groundwater investigation in accordance with NMED’s December 22, 2020 approval with modifications of the Synopsis of the Findings of the 600 Area Closure Geophysical Seismic Refraction Tomography and Reflection Surveys with Revised Soil Boring Locations Submitted for NMED Approval. The perched groundwater investigation report is due to NMED no later than December 31, 2021.

3.6 SWMUs 2, 8, and 34 and AOC 51 (Wastewater Lagoons)


3.7 SWMU 10 (200 Area Hazardous Waste Transmission Lines)

- NASA continued revising the NASA WSTF 200 Area HWTL (SWMU 10) Investigation Report (July 30, 2019) and planning additional fieldwork to address 16 NMED comments from the November 16, 2020 disapproval. A revised report is due to NMED no later than August 30, 2021.
- Due to negative schedule impacts resulting from the coronavirus pandemic, additional time is required to complete investigation fieldwork and project reporting. NASA submitted the Request for Extension of Time for Submittal of Hazardous Waste Transmission Lines (SWMU 10) Investigation Report on May 19, 2021.
3.8 SWMU 16 (600 Area BLM Off-site Soil Pile)
- NMED approved the revised *NASA WSTF SWMU 16 (600 Area BLM Off-Site Soil Pile) Investigation Report* (December 18, 2019) with modifications on May 6, 2021. NMED directed NASA to address five comments and provide a revised report no later than July 30, 2021. NMED also directed NASA to prepare the recommended Accelerated Corrective Measures Work Plan and submit the plan to NMED no later than September 30, 2021. NASA began working on these documents.

3.9 SWMUs 21-27 (Septic Tanks)

3.10 SWMUs 29-31 (Small Arms Firing Ranges)

3.11 SWMU 33 (Test Stand 302 Cooling Water Pond)
- NMED is reviewing the revised *SWMU 33 Historical Investigation Summary and Investigation Work Plan* (August 17, 2020).

3.12 SWMU 47 (500 Area Fuel Storage)
- NASA continued developing the response to NMED’s March 19, 2021 disapproval of the *Response to Disapproval of 500 Area Fuel Storage Area (SWMU 47) Investigation Work Plan* (November 21, 2019). The response to NMED’s five comments and the revised work plan are due to NMED no later than July 30, 2021.

3.13 SWMU 49 (700 Area Landfill)
- NASA resumed investigation fieldwork at the 700 Area Landfill on May 25, 2021. NASA’s geophysics subcontractor first performed four suitability test lines for ground penetrating radar (GPR) and four suitability test lines for active multi-channel analysis of surface waves (AMASW) in order to provide greater detail regarding the locations and attributes of the landfill trenches and their contents to a depth of 20 feet. In conjunction, an augmented passive seismic survey (PSS) was performed to define deeper subsurface alluvial lithology to the depth of the bedrock surface at approximately 160 feet. Between May 25 and May 31, 2021, the subcontractor identified AMASW as the preferred method over GPR for shallow investigation due to superior results and imaging. The subcontractor completed a total of 12 AMASW survey lines primarily along the axis of landfill trenches for vertical profiling. Limited ambient noise required for the PSS was augmented using surface impacts at specific off-end line positions. A total of eight passive survey lines were completed on a grid across the landfill footprint. AMASW and PSS field activities are anticipated to be completed in early June 2021 and will be followed by data processing and interpretation.

- The Phase I investigation report is due to NMED by April 29, 2022.

3.14 SWMU 50 (TDRSS Diesel Release)
3.15 SWMU 52 (Second TDRSS UST)
- NASA received and evaluated chemical analytical data from samples of the containerized excess soil generated from investigation fieldwork performed March 2021. The waste, currently managed in intermediate bulk containers as petroleum contaminated soil in accordance with New Mexico Special Waste rules, will be disposed of at the Valencia Regional Landfill and Recycling Facility in the near future.
- NASA collected samples of indoor air at STGT Building T-3, which lies adjacent to the diesel release from the generator fuel return line. NASA received and evaluated chemical analytical data from the samples and is incorporating the data into the Minimum Site Assessment Investigation Report for submittal to the NMED Petroleum Storage Tank Bureau by June 30, 2021.
- NMED is reviewing the Second TDRSS Underground Storage Tank (SWMU 52) Release Assessment Report (February 18, 2021).

3.16 Newly Identified SWMU near 500 Area
- NMED is reviewing the 500 Area Newly Identified SMWU Release Assessment Report (June 22, 2020).

3.17 Monitoring Well Installation and Decommissioning

3.18 Westbay Monitoring Well Reconfiguration
- NASA continued planning for monitoring well work described in the NMED-approved Work Plan for Abandonment of NASA WSTF Well BLM-30 and Replacement with Monitoring Well BLM-43 (February 3, 2021; revised). Fieldwork is being scheduled in accordance with NASA’s phased approach to returning to on-site work.
- NMED is reviewing the Well Abandonment Work Plan for Well BLM-28 (April 29, 2021). In prior correspondence, NMED directed NASA to develop a subsequent work plan for well replacement or notification that the well will not be replaced, no later than January 31, 2022.

3.19 Targeted Mobile Remediation Process (TMRP)
- During May 2021, NASA continued TMRP fieldwork in accordance with the Targeted Mobile Remediation Process Pilot Test Work Plan (April 26, 2019; updated). NASA extracted 45,883 gallons of contaminated groundwater in May 2021. NASA evaluated well performance data to identify wells that will be targeted for additional groundwater extraction as the program progresses.
- NASA continued the second episode of groundwater extraction at well MPE-3 through May 2021. NASA has extracted 13,300 gallons from this well, for a total of 148,200 gallons since beginning extraction on July 9, 2020. NASA expects to continue groundwater extraction at well MPE-3 in June 2021.
NASA continued the second episode of groundwater extraction at well ST-1-541 through May 2021, removing an additional 11,800 gallons from the well. NASA has extracted a total of 147,500 gallons from the well since beginning extraction on June 24, 2020. NASA expects to continue groundwater extraction at well ST-1-541 in June 2021.

NASA continued the second episode of groundwater extraction at well MPE-4 through May 2021, removing an additional 5,985 gallons of groundwater from the well. NASA has extracted a total of 14,265 gallons from the well since beginning extraction on March 17, 2021. NASA expects to continue groundwater extraction at well MPE-4 in June 2021.

NASA continued the second episode of groundwater extraction at well 400-A-151 through May 2021, removing an additional 898 gallons of groundwater from this well. NASA has extracted a total of 2,567 gallons from this well since beginning extraction on March 30, 2021. NASA expects to continue groundwater extraction at this well in June 2021.

NASA continued the second episode of groundwater extraction at well ST-1-473 through May 2021, removing an additional 13,900 gallons from this well. NASA has extracted a total of 19,500 gallons from this well since beginning extraction on April 21, 2021. NASA expects to continue groundwater extraction at this well in June 2021.

NASA transported extracted groundwater to the MPITS for treatment and discharge in accordance with the approved work plan and DP-1255.

On March 2, 2021 NASA submitted the 15-day Notification for Contaminated Groundwater Release at Monitoring Well ST-1-541, which provided information on NASA’s planned response to a release of approximately 900 gallons of contaminated groundwater to the soil. NMED responded to the notification on April 6, 2021 and directed NASA to provide additional information on the planned response in a work plan due to NMED by June 4, 2021. NASA is addressing NMED’s concerns in a revised work plan. NASA submitted the Request for a “Contained-in” Determination for Contaminated Media Associated with the February 16, 2021 ST-1-541 Contaminated Groundwater Release on April 21, 2021. NMED approved the request on May 10, 2021 and NASA is coordinating disposal of the waste.

NMED is reviewing the Targeted Mobile Remediation Process Interim Status Report – Project Year 2 (August 17, 2020).

3.20 Groundwater Data Representativeness Evaluation

NMED is reviewing the Groundwater Data Representativeness Phase 1: Water FLUTe Well Evaluation Abbreviated Investigation Report (February 27, 2020).

3.21 Dye Tracer Test Investigation

NMED is reviewing the Report on Tracer Testing in the 200/600 Areas and Mid-plume Constriction Area (August 31, 2020).

4.0 Non-compliance Issues

The NASA Hazardous Waste Permit requires that other non-compliance conditions be reported to NMED. There were no instances of other non-compliance conditions during this reporting period that require notification under the Permit. The criteria for non-compliance reporting in this report (as defined by 40 CFR 270.30 (l)(10) and EPA interpretations at RCRA Faxbacks 13142 and 13686) would be any non-compliance with permit conditions that is not classified as minor recordkeeping, reporting, and similar oversights that were corrected once discovered. Additionally, there were no issues meeting the
previously defined criteria (minor items immediately corrected) that were part of a repeating pattern of non-compliance.

5.0 Documents Submitted

5.1 Documents submitted to the Hazardous Waste Bureau in May 2021

- NASA submitted the *Response to NMED Approval with Modifications for 600 Area Closure Geophysics Survey Status Report – Comment 2 (Further Investigation)* on May 18, 2021.

5.2 Pertinent documents submitted to other NMED bureaus in May 2021

- NASA certified the *MACT Report – Opacity/Visible Emissions Test Results (ZZZZ)* online for the Air Quality Bureau on May 20, 2021.

5.3 Status of documents previously submitted to the NMED Hazardous Waste Bureau for which activity was recorded in May 2021

- NASA submitted the *Response to Fourth Disapproval of NASA WSTF SWMU 16 (600 Area BLM Off-Site Soil Pile) Investigation Report* on December 18, 2019. NMED approved the revised investigation report with modifications on May 6, 2021. NMED directed NASA to address five comments and provide a revised report no later than July 30, 2021. NMED also directed NASA to prepare the recommended Accelerated Corrective Measures Work Plan and submit the plan to NMED no later than September 30, 2021.
- NASA submitted the *Response to Disapproval of the NASA WSTF 200 Area HWTL (SWMU 10) Investigation Report* on July 30, 2019. NMED disapproved the report on November 16, 2020 and directed NASA to address 16 NMED comments and submit a revised report no later than August 30, 2021. Due to delays created by NASA’s response to the coronavirus pandemic,


- NASA submitted the Response to Disapproval of Abbreviated Investigation Work Plan for 600 Area Perched Groundwater on December 22, 2016. NASA submitted the Request for Extension of Time for Performing 600 Area Perched Groundwater Investigation Due to Geophysical Survey Implications on September 13, 2017. NMED approved the request on October 18, 2017. NASA submitted the Request for Extension of Time for Performing 600 Area Perched Groundwater Investigation due to Ongoing Wastewater Lagoon Investigation on August 22, 2018. NMED approved the request on September 13, 2018. NASA submitted the Request to Remove Electrical Resistivity Component of the 600 Area Perched Groundwater Geophysical Survey based on Geophysical Subcontractor Input Received during the Procurement Process on August 7, 2019. NMED responded with the Work Scope Modification Request Abbreviated Investigation Work Plan for 600 Area Perched Groundwater on August 23, 2019, approving NASA’s request to remove electrical resistivity from the investigation. NASA submitted the Synopsis of the Findings of the 600 Area Closure Geophysical Seismic Refraction Tomography and Reflection Surveys with Revised Soil Boring Locations Submitted for NMED Approval on December 19, 2019. NASA received NMED’s January 15, 2020 fee assessment for review of the report on February 3, 2020 and provided the $2,000 review fee on February 12, 2020. To accommodate NMED review of this submittal, NASA submitted the Request for Extension of Time for Submittal of the 600 Area Perched Groundwater Investigation Report on March 24, 2020. NMED approved the request on April 24, 2020, extending the due date for submittal of the perched groundwater investigation report to 150 days following NMED approval of the synopsis. On July 15, 2020, NASA received a second approval of the extension request from NMED dated July 1, 2020. On December 22, 2020, NMED approved the 600 Area Closure Geophysical Survey Status Report with modifications and provided three comments for NASA consideration. NASA submitted the Response to NMED Approval with Modifications for 600 Area Closure Geophysics Survey Status Report – Comment 2 (Further Investigation) on May 18, 2021.


approved the report with modifications on May 10, 2021 and directed NASA to implement three modifications and submit a revised report no later than June 30, 2021.

- NASA submitted the *NASA WSTF Periodic Monitoring Report – Third Quarter 2020* on November 9, 2020. NASA received NMED’s December 17, 2020 fee assessment for review of the report and provided the $5,000 review fee on February 18, 2020. NMED approved the report with one modification on May 10, 2021 and directed NASA to implement the modification and submit a revised report no later than June 30, 2021.
