



Certified Mail - Return Receipt Requested

January 18, 2022

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

Attention of: RE-21-102

**RE: APPROVAL WITH MODIFICATIONS
WELL RECONFIGURATION WORK PLAN FOR WELL BW-4
NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
JOHNSON SPACE CENTER WHITE SANDS TEST FACILITY
DOÑA ANA COUNTY, NEW MEXICO
EPA ID #NM08800019434
HWB-NASA-21-010**

Dear Mr. Davis:

The New Mexico Environment Department (NMED) has received the National Aeronautics and Space Administration Johnson Space Center White Sands Test Facility (Permittee) *Well Reconfiguration Work Plan for Well BW-4* (Work Plan), dated June 29, 2021. NMED has completed review of the Work Plan and hereby issues this Approval with the following modifications.

MODIFICATIONS

1. Contamination Data Review and Comparison, Page 4

NMED Comment: The following issues must be addressed as follows:

- a. The well evaluation has identified a sampling zone potentially conducive to the collection of groundwater data at a bedrock fracture located at 330 feet below top of casing (ft btoc); however, the highest historical concentrations of the

contaminants of concern (COCs) trichlorethylene and tetrachloroethylene were reported at former sampling ports located at 355 and 455 ft btoc at monitoring well BW-4. In addition to the contaminant data comparison discussed in the section, also address the abandonment of the 355 and 455 ft btoc sampling intervals and the implications to vertical delineation of the COC contaminant plume at the sampling location. Revise the Work Plan accordingly and provide respective replacement pages.

- b. Following completion of the proposed one year of quarterly sampling, the collected data must be compared to all historical data collected at monitoring well BW-4 and surrounding monitoring wells. The monitoring well evaluation may be briefly addressed in an update to the White Sands Test Facility Groundwater Monitoring Plan (GMP) with the proposed sampling schedule update for monitoring well BW-4. If deemed necessary by the well evaluation, additional monitoring well installation(s) for characterization of the groundwater contaminant plumes for WSTF COCs at and in the vicinity of the sampling location must be initially proposed in the GMP. NMED will establish a work plan submittal schedule in a response to the GMP, if necessary. Revise the Work Plan accordingly and provide respective replacement pages.

2. Schedule, Page 7

NMED Comment: The Permittee must submit a report formatted to provide all applicable information required by the November 2009 *White Sands Test Facility Hazardous Waste Permit*, Attachment 19, Monitoring Well Construction Requirements, Section 19.5, Documentation, for NMED review no later than **March 30, 2023**. Revise the Work Plan accordingly and provide a respective replacement page.

The Permittee must provide replacement pages that address NMED's modifications. In addition, a response letter that cross-references where the modifications were addressed must be provided. The response letter must also be provided as an electronic copy. Electronic copies of the redline-strikeout version of the Work Plan showing where all changes were made to the Work Plan and the revised Work Plan must be submitted to NMED no later than **March 11, 2022**.

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

Mr. Davis
January 18, 2022
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If you have any questions regarding this letter, please contact Gabriel Acevedo at (505) 690-5760.

Sincerely,

Rick Shean

Digitally signed by Rick
Shean
Date: 2022.01.18 08:53:51
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Rick Shean
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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File: NASA 2022 and Reading

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