

National Aeronautics and
Space Administration

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



May 17, 2022

Reply to Attn of: RE-22-061

Mr. Rick Shean, 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 April 2022

Enclosed is the NASA White Sands Test Facility (WSTF) Monthly Environmental Activity Report for April 2022. 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 of my staff at 575-571-9668.

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For: 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

National Aeronautics and Space Administration



Monthly Environmental Activity Report
April 2022

Report Deadline: April 15, 2022

NASA Johnson Space Center White Sands Test Facility
Monthly Environmental Activity Report

April 2022

NM8800019434

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.

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For: Timothy J. Davis
Chief, Environmental Office

Date

National Aeronautics and Space Administration

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Executive Summary

The following summarizes important information associated with NASA White Sands Test Facility (WSTF) environmental program activities in April 2022:

- NASA completed shipments of hazardous waste, universal waste, regulated medical waste, used oil, and used oil filters in April 2022.
- NASA sampled 40 of 44 groundwater monitoring wells scheduled for April 2022 and scheduled 40 groundwater monitoring wells for sampling in May 2022.
- NASA operated the Mid-plume Interception and Treatment System on 30 of 30 days in April 2022 and treated 0.98 acre-feet of contaminated groundwater and 2,940 gallons of investigation-derived waste (IDW).
- NASA operated the Plume Front Treatment System on 19 of 30 days in April 2022 and treated 40.9 acre-feet of contaminated groundwater. NASA initiated scheduled maintenance at the PFTS.
- NASA continues follow-on activities associated with the recent perched groundwater investigation. NASA also continued extraction of perched groundwater at monitoring well 600-G-138.
- NASA completed and submitted the Phase I investigation report for the 700 Area Landfill.
- NASA addressed NMED's comments in the disapproval of the *Second TDRSS Underground Storage Tank (SWMU 52) Release Assessment Report* and submitted the required response.
- NASA continued developing the NMED-required investigation work plan for the newly identified SWMU in the 500 Area (former oxidizer burner).
- NASA continued project planning for several monitoring well projects.
- NASA submitted seven documents to the NMED Hazardous Waste Bureau in April 2022.
- There were no reportable non-compliance issues in April 2022.

1.0 Waste Management Activities

1.1 NASA completed the following waste shipments in April 2022.

Date	Shipped To	Type of Waste	No. of Containers	Amount of Waste	Disposition
4/7/22	US Ecology, Beatty, NV	Hazardous Waste	1	241 kg	Solidification
4/15/22	Big Green Box, Anaheim, CA	Universal	3	41 kg	Recycle
4/20/22	Stericycle, Albuquerque, NM	Regulated Medical Waste	1	28 gal	Sterilization
4/21/22	Veolia, Phoenix, AZ	Universal Waste	20	760 kg	Recycle
4/21/22	Clean Harbors Spring Grove Resource Recovery, Cincinnati, OH	Used Oil (Transformer)	14	Approx. 501 gal	Recycle
4/21/22	Thermo Fluids, El Paso, TX	Used Oil	13	Approx. 625 gal	Recycle
4/21/22	Mesa Oil, El Paso, TX	Used Oil Filters	1	30 gal	Recycle

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

2.0 Environmental Monitoring

2.1 NASA performed sampling at 40 of 44 groundwater monitoring wells or zones scheduled for sampling in April 2022, in accordance with the approved Groundwater Monitoring Plan (GMP). Initial sampling of well WW-4 after installation of the new Water FLUTE sampling system was postponed from April to May due to resource availability. Previous deviations from the planned sampling schedule are described below and have been reported to NMED in previous monthly reports:

- Wells 400-IV-123 (scheduled for sampling in January 2022), BLM-1-435 (scheduled for sampling in April 2021), PL-3-453 (scheduled for sampling in December 2020), and 400-C-118 (scheduled for sampling in November 2020) have not been sampled because the water levels are not sufficient for sampling.
- 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 evaluated the monitoring well and has determined that it should be abandoned. NMED approved the 2021 GMP with a modification that required submittal of a work plan to replace

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well NASA 9 no later than April 29, 2022. NASA submitted the work plan for well replacement on April 29, 2022.

- 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 abandon and replace this well (Section 3.17).
- 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). NASA replaced the Water FLUTE system in this well in late February 2022 and plans to resume routine groundwater sampling required by the GMP in May 2022.

- 2.2 NASA performed other regulatory groundwater sampling requirements as scheduled and as allowed by operational status. NASA did not sample wells PFE-1 and PFE-3 because they were not operational due to equipment failure.
- 2.3 NASA developed the May 2022 groundwater sampling schedule and plans to sample 40 groundwater monitoring wells or zones based on GMP requirements.

3.0 Corrective Actions/Investigations

3.1 Mid-plume Interception and Treatment System Operations

Days Operated	Average Flow Rate (gpm)	Volume Extracted and Treated (acre-feet)	Volume of Groundwater Discharged to Infiltration Basin (acre-feet)	Volume of IDW Treated and Discharged to the Infiltration Basin (gallons)
30 of 30	8.1	0.98	0.98	2,940

Shutdown Date	Restart Date	Shutdown Status	Discussion
3/31/22	4/1/22	Unplanned	The system shut down automatically because of a disruption in the electrical power supply.
4/4/22	4/4/22	Planned	NASA shut down the system to update processor firmware/software.
4/5/22	4/5/22	Planned	NASA shut down the system to update processor firmware/software.
4/25/22	4/26/22	Planned	NASA shut down the system to accommodate a planned electrical power outage.

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3.2 Plume Front Treatment System Operations

Days Operated	Average Flow Rate (gpm)	Volume Extracted/Treated (acre-feet)	Volume Injected (acre-feet)	Volume Discharged to Grade (acre-feet)	Volume Discharged to Modu-Tank (acre-feet)
19 of 30	394	40.9	40.5	0.36	0

Shutdown Date	Restart Date	Shutdown Status	Discussion
4/1/22	4/1/22	Planned	NASA shut the system down to repair a valve on the spent solution tank.
4/1/22	4/4/22	Planned	NASA shut the system down to evaluate and repair a faulty isolation valve on an air stripper.
4/5/22	4/5/22	Unplanned	The system shut down automatically due to a low air flow alarm at one of the air strippers.
4/10/22	4/11/22	Unplanned	The system shut down automatically because of a disruption in the electrical power supply.
4/12/22	4/12/22	Unplanned	The system shut down automatically because of a disruption in the electrical power supply.
4/21/22		Planned	NASA shut the system down for scheduled maintenance.

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

- NMED is reviewing the *Response to Disapproval of 400 Area Supplemental Groundwater and Soil Vapor Monitoring Plan* (July 14, 2021), the *NASA WSTF 400 Area Closure Investigation Report – NMED Third Disapproval Response* (July 27, 2021), and the *Response to Disapproval of 300 Area Supplemental Abbreviated Drilling Work Plan* (July 14, 2021).

3.5 600 Area Perched Groundwater Extraction Pilot Test and Investigation

- In April 2022, NASA extracted approximately 100 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*. Groundwater elevation measurements indicate there is approximately 1.98 feet of perched groundwater within this well. Extracted groundwater was containerized for treatment at the Mid-plume Interception and Treatment System (MPITS) and discharged in accordance with DP-1255.
- NASA completed initial development activities for the new conventional monitoring wells 600A-001-GW and 600A-002-GW. Volume and parameter stability objectives were met, and turbidities were reduced to acceptable. These wells will be sampled in accordance with the

current NMED-approved GMP following two to three weeks of post-development equilibration in May 2022. NASA continued developing the perched groundwater investigation report that is due to NMED by June 30, 2022.

- NASA prepared and submitted the *Request for a “Contained-in” Determination for Contaminated Media Associated with the 600 Area Perched Groundwater Abbreviated Investigation Work Plan* on March 22, 2022. NMED approved the request and granted a “no longer contained in determination” on April 18, 2022. It is anticipated that the soil cuttings generated from the drilling activities will be disposed of in the May 2022 timeframe.

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

- NMED is reviewing the *NASA White Sands Test Facility (WSTF) 200 Area Wastewater Lagoons Closure (SWMU 8) Investigation Report* (November 25, 2019), the *NASA White Sands Test Facility (WSTF) 600 Area Wastewater Lagoons Closure (SWMU 34) Investigation Report* (November 26, 2019), the *NASA White Sands Test Facility (WSTF) 100 Area Wastewater Lagoons Closure (SWMU 2) Investigation Report* (August 3, 2020), and the *NASA White Sands Test Facility (WSTF) STGT Wastewater Lagoons Closure (AOC 51) Investigation Report* (October 13, 2020).

3.7 SWMU 10 (200 Area Hazardous Waste Transmission Lines [HWTL])

- NMED is reviewing the *Response to Second Disapproval of NASA WSTF 200 Area HWTL (SWMU 10) Investigation Report and Risk Assessment Report* (March 4, 2022).

3.8 SWMU 16 (600 Area BLM Off-site Soil Pile)

- NMED is reviewing the *Accelerated Corrective Measures Work Plan for the NASA WSTF SWMU 16 (600 Area BLM Off-Site Soil Pile)* (September 28, 2021).

3.9 SWMUs 21-27 (Septic Tanks)

- NMED is reviewing the *Response to Second Disapproval of NASA White Sands Test Facility (WSTF) Septic Tanks (SWMUs 21-27) Investigation Report* (May 18, 2021).

3.10 SWMUs 29-31 (Small Arms Firing Ranges)

- NMED is reviewing the *Response to Second Disapproval Small Arms Firing Ranges (SWMUs 29-31) Remedy Completion Report and Risk Assessment Report* (August 3, 2020).

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)

- NMED is reviewing the *Response to Second Disapproval of 500 Area Fuel Storage (SWMU 47) Investigation Work Plan* (June 29, 2021).

3.13 SWMU 49 (700 Area Landfill)

- NASA completed the required Phase I investigation report and submitted for NMED review on April 29, 2022.

3.14 SWMU 50 (TDRS Diesel Release)

- NMED is reviewing the *Response to Disapproval of First Tracking Data Relay Satellite System (TDRSS) Diesel Release (SWMU 50) Investigation Report and Risk Screen Evaluation Report* (November 9, 2020).

3.15 SWMU 52 (Second TDRS UST)

- The NMED Hazardous Waste Bureau disapproved the *Second TDRSS Underground Storage Tank (SWMU 52) Release Assessment Report* (February 18, 2021). NASA addressed NMED's four comments and submitted the *Response to Disapproval of NASA WSTF Second TDRSS Underground Storage Tank (SWMU 52) Release Assessment Report* on April 26, 2022.

3.16 Newly Identified SWMU Near 500 Area (Former Oxidizer Burner)

- NASA continued developing an investigation work plan for the former oxidizer burner in the 500 Area. The unit will be identified as a SWMU in the Permit at an appropriate time. The work plan is due to NMED no later than August 31, 2022.

3.17 Groundwater Monitoring Well Abandonment, Installation, and Reconfiguration

- NMED is reviewing the *NASA WSTF Westbay Well Reconfiguration Work Plan for Wells PL-7, PL-8, PL-10, ST-5, and WW-3* (April 29, 2021).
- NASA continued planning for the abandonment of well BLM-28 in accordance with NMED's January 10, 2022 approval of the *Well Abandonment Work Plan for Well BLM-28* (April 29, 2021).
- NASA continued planning the reconfiguration of well BW-4 as described in the *Response to Approval with Modifications of NASA WSTF Well Reconfiguration Work Plan for Well BW-4* (March 8, 2022).
- NMED approved the *NASA WSTF Work Plan for Drilling and Installation of Monitoring Well 600B-001-GW* (BLM-28 replacement; August 31, 2021) and the *Work Plan for Drilling and Installation of Monitoring Well 600C-001-GW at the NASA White Sands Test Facility (WSTF)* (deeper well adjacent to BLM-10-517; August 31, 2021). NASA began planning for well installation.
- NASA continued planning for the abandonment of wells 200-SG-2 and 200-SG-3 in accordance with NMED's January 10, 2022 approval of the *Well Plugging Plan of Operations for Multipoint Soil Vapor Groundwater Monitoring Wells 200-SG-2 and 200-SG-3* (November 30, 2021).

3.18 Targeted Mobile Remediation Process (TMRP)

- NMED is reviewing the *NASA WSTF Targeted Mobile Remediation Process Pilot Test Report* (March 8, 2022).
- NMED approved the *NASA White Sands Test Facility Monitoring Well ST-1-541 Contaminated Groundwater Release Abbreviated Investigation Work Plan* (June 3, 2021) on April 25, 2022. NASA began project planning and procurement activities.

3.19 Groundwater Data Representativeness Evaluation

- NMED is reviewing the *Abbreviated Investigation Work Plan for Groundwater Data Representativeness, Phase 2: FLUTE Well Evaluation* (November 2, 2021).

3.20 Dye Tracer Test Investigation

- NMED approved the *Report on Tracer Testing in the 200/600 Areas and Mid-plume Constriction Area* (August 31, 2020) on April 5, 2022. NASA is reviewing NMED's comments.

3.21 Site-wide Geophysics Investigation

- NASA and the off-site geophysics subcontractor completed the passive seismic field survey in the WSTF Plume Front area in February 2022. Geophones were deployed across a 1 x 2-mile area that incorporates the Plume Front remediation wells, footprint of the westernmost groundwater plume, and the Western Boundary Fault Zone. The subcontractor continued passive seismic data download, processing, and reporting in April 2022. NASA expects to receive initial data from the subcontractor in May 2022 and process the data for inclusion in the site-wide geophysical investigation report that will be submitted to NMED in the fall of 2022.

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 April 2022

- NASA submitted the *Response to Disapproval of NASA WSTF Second TDRSS Underground Storage Tank (SWMU 52) Release Assessment Report* on April 26, 2022.
- NASA submitted the *Request for Second Extension of Time for Submittal of the Completion Report for Monitoring Well BLM-30 Abandonment and Installation of Replacement Monitoring Well BLM-43* on April 26, 2022.
- NASA submitted the *600 Area Perched Groundwater Extraction Pilot Test Interim Status Report – Project Year 9* on April 26, 2022.
- NASA submitted the *NASA WSTF Groundwater Monitoring Plan Update for 2022* on April 29, 2022.
- NASA submitted the *NASA WSTF Work Plan for Abandonment of NASA WSTF NASA 9 and Replacement with Monitoring Well 400-001-GW* on April 29, 2022.
- NASA submitted the *NASA WSTF Periodic Monitoring Report – First Quarter 2022* on April 29, 2022.
- NASA submitted the *NASA White Sands Test Facility (WSTF) 700 Area Landfill Closure (SWMU 49) Phase I Investigation Report* on April 29, 2022.

5.2 Pertinent documents submitted to other NMED bureaus in April 2022

- NASA submitted the *NASA JSC White Sands Test Facility- FF, NM3590607, Notice of Water Safety Upgrades for 300 and 400 Areas Project Initiation* to the Drinking Water Bureau on April 5, 2022.
- NASA submitted the *NASA White Sands Test Facility (WSTF) 700 Area Landfill Cap Repair Report* to the Solid Waste Bureau on April 5, 2022.

- NASA submitted the *NASA White Sands Test Facility (WSTF) Written Release Notification* to the Ground Water Quality Bureau on April 14, 2022.
- 5.3 Status of documents previously submitted to the NMED Hazardous Waste Bureau for which additional correspondence was recorded in April 2022
- NASA submitted the *Discussion Relative to the Phase 1A and Phase 1B Soil Vapor Survey (SVS) Component of the Ongoing 700 Area Landfill Phase I Investigation* on October 19, 2021. NMED disapproved the status letter on November 12, 2021 and directed NASA to address four comments and submit a revised status letter no later than December 31, 2021. NASA submitted the *Revised Discussion Relative to the Phase 1A and Phase 1B Soil Vapor Survey (SVS) Component of the Ongoing 700 Area Landfill Phase I Investigation* on December 21, 2021. NMED approved the revised status letter and authorized NASA to forgo the Phase 1B passive soil vapor survey at the 700 Area landfill. NASA submitted the *NASA White Sands Test Facility (WSTF) 700 Area Landfill Closure (SWMU 49) Phase I Investigation Report* on April 29, 2022.
 - NASA submitted the *NASA WSTF Periodic Monitoring Report – Second Quarter 2019* on July 30, 2019. NASA received NMED’s August 19, 2019 fee assessment for review of the report on August 28, 2019 and provided the \$2,000 review fee to NMED on September 12, 2019. NMED approved the report with modifications on February 6, 2020 and directed NASA to address nine NMED comments and submit a revised report no later than April 10, 2020. NMED also directed NASA to submit a report documenting the 200 and 600 Area groundwater dye tracer investigation no later than July 31, 2020. NASA submitted the *Response to Approval with Modifications of NASA WSTF Periodic Monitoring Report – Second Quarter 2019* on May 4, 2020. NASA submitted the *Report on Tracer Testing in the 200/600 Areas and Mid-plume Constriction Area* on August 31, 2020. NMED approved the report on April 5, 2022 with a modification that included direction for NASA to install six additional groundwater monitoring wells at WSTF. NASA is reviewing NMED’s comments in the *Approval with Modification*.
 - NASA submitted the *NASA WSTF Drilling Work Plan for Abandonment of Well BLM-30 and Drilling of New Monitoring Well BLM-43* on August 29, 2019. NASA received NMED’s September 20, 2019 fee assessment for review of the work plan on September 23, 2019 and provided the \$1,000 review fee to NMED on October 31, 2019. NMED approved the work plan with modifications on November 5, 2020 and directed NASA to address three comments and submit a revised plan no later than January 29, 2021. NASA submitted the *Response to Approval with Modifications Work Plan for Abandonment of NASA WSTF Well BLM-30 and Replacement with Monitoring Well BLM-43* on February 3, 2021. Some of NASA’s off-site service providers are experiencing heavy workloads related to easing COVID-19 work restrictions, resulting in delays in NASA’s ongoing fieldwork. To accommodate these schedule impacts, NASA submitted the *Request for Extension of Time for Submittal of the Completion Report for Monitoring Well BLM-30 Abandonment and Installation of Replacement Well BLM-43* on September 28, 2021. NMED approved the request on October 27, 2021, extending the due date for submittal of the well completion report to November 30, 2022. In order to align the schedule for installation of well BLM-43 with two recently approved additional groundwater monitoring wells, NASA submitted the *Request for Second Extension of Time for Submittal of the Completion Report for Monitoring Well BLM-30 Abandonment and Installation of Replacement Monitoring Well BLM-43* on April 26, 2022.
 - 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. In the

response, NASA recommended proceeding with the planned perched groundwater borings and the ongoing site-wide geophysical survey in lieu of expanding the 600 Area Closure geophysical survey. NMED concurred with the recommendation and directed NASA to proceed with the remaining 600 Area Closure perched groundwater investigation project work in accordance with NASA's December 2016 Revised Abbreviated Investigation Work Plan for the 600 Area Perched Groundwater (RAIWP) and subsequent NMED direction to proceed from December 2020. Because of delays encountered securing the services of a qualified subcontract drilling company, NASA submitted the *Request for Extension of Time for Submittal of the 600 Area Perched Groundwater Investigation Report* on October 5, 2021. NMED approved the request on October 27, 2021, extending the due date for submittal of the report to May 31, 2022. NASA submitted the *Request for Second Extension of Time for Submittal of the 600 Area Perched Groundwater Investigation Report* on March 15, 2022. NMED approved the request on April 7, 2022, extending the due date for submittal of the report to June 30, 2022. NASA submitted the *Request for a "Contained-in" Determination for Contaminated Media Associated with the 600 Area Perched Groundwater Abbreviated Investigation Work Plan* on March 22, 2022. NMED approved the request on April 18, 2022 and directed NASA to manage and dispose of the waste as solid waste.

- NASA submitted the *NASA White Sands Test Facility Hazardous Waste Operating Permit SWMU 52 Incident Notification* on August 17, 2020. NMED responded to the notification on November 9, 2020 and directed NASA to submit a Release Assessment Report to the Hazardous Waste Bureau no later than February 26, 2021. NASA submitted the *Second TDRSS Underground Storage Tank (SWMU 52) Release Assessment Report* on February 18, 2021. NASA received NMED's April 8, 2021 fee assessment and invoice for review of the report and provided the \$8,500 review fee on April 21, 2021. NMED disapproved the report on March 1, 2022 and directed NASA to address four NMED comments and submit a revised report no later than May 6, 2022. NASA submitted the *Response to Disapproval of NASA WSTF Second TDRSS Underground Storage Tank (SWMU 52) Release Assessment Report* on April 26, 2022.