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Governor

JOHN A. SANCHEZ
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

**2905 Rodeo Park Drive East, Building 1
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Cabinet Secretary Designate

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Deputy Secretary

TOM BLAINE, P.E.
Director
Environmental Health Division

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 8, 2013

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

Attention of: RE-E13-068

**RE: APPROVAL WITH MODIFICATIONS
WSTF SEPTIC TANKS (SWMU 21 – 27) HISTORICAL INFORMATION
SUMMARY AND INVESTIGATION WORK PLAN
NATIONAL AERONAUTICS SPACE ADMINISTRATION (NASA)
JOHNSON SPACE CENTER (JSC) WHITE SANDS TEST FACILITY (WSTF)
DOÑA ANA COUNTY, NEW MEXICO
EPA ID #NM08800019434
HWB-NASA-13-010**

Dear Ms. Bunker-Farrah:

The New Mexico Environment Department (NMED) has received the *WSTF Septic Tanks (SWMU 21 – 27) Investigation Work Plan*, (IWP) dated June 2013 and received June 28, 2013. NASA WSTF (the Permittee) also prepared a *WSTF Septic Tanks Historical Information Summary* (HIS) which was included with the IWP. NMED has completed review of both documents and provides the following modifications for the IWP.

Modifications

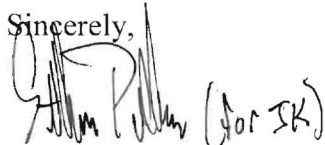
Section 4.5 (*SWMU 22 Removal Activities*) of the Permittee's IWP and Appendix A (*WSTF Septic Tanks Removal Plan*) of the IWP only contemplates investigation of the tank and leach field at Solid Waste Management Unit (SWMU) 22. This decision is based on historical information collected by the Permittee which indicates that SWMU 22 was the only tank and leach field that may have been affected by past disposal of hazardous wastes or hazardous constituents. As indicated in both the HIS and IWP for the sites, recordkeeping during site startup in the mid-60s until the mid- to late-80s was less thorough than it is today. Accordingly, neither the Permittee nor NMED can be certain that the other tanks were unaffected by past site disposal practices.

In light of this uncertainty, NMED seeks to gather as much useful information as possible during the removal of various NASA WSTF septic tanks while not causing unnecessary project delays. During removal activities, in the event the Permittee discovers evidence that a given septic tank has leaked, NMED's Hazardous Waste Bureau (HWB) must be notified within 24 hours by phone of the discovery. To the extent possible, the Permittee must provide NMED HWB with its best estimate of possible waste volumes that may have been discharged over time from the leaking tank(s). It may be difficult or impossible to provide this estimate given that the tank sizes, construction materials used, and construction time-frames vary widely across the facility. The Permittee and NMED HWB will determine the next course of action, if any.

Possible future courses of action may include sampling and analysis of the tank contents and/or the possible mobilization of drilling equipment to obtain samples from potentially affected site soils. The timing of possible drilling activities and soil sample collection must be coordinated by the Permittee to minimize equipment mobilization expenses. This means the Permittee may decide to delay mobilizing drilling equipment until after all of the septic tanks have been removed.

If you have any questions regarding this letter, please contact Daniel Comeau at (505) 476-6043.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kielling", followed by the initials "(for JK)" in parentheses.

John E. Kielling
Chief
Hazardous Waste Bureau

Ms. Bunker-Farrah
November 8, 2013
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cc: N. Dhawan, NMED HWB
D. Cobrain, NMED HWB
M. Montoya, NMED, DIII, LWP
R. Isaac, NMED GWQB
L. King, EPA 6PD-N
T. Davis NASA WSTF
M. Zigmond, NASA WSTF

File: NASA WSTF, 2013, Approval With Direction Septic Tank HIS and IWP

New Mexico Environment Department
Hazardous Waste Bureau
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