



Certified Mail - Return Receipt Requested

March 16, 2023

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-21-081

**RE: APPROVAL WITH MODIFICATIONS
REVISED WSTF SEPTIC TANKS (SWMU 21-27) INVESTIGATION REPORT
NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
JOHNSON SPACE CENTER WHITE SANDS TEST FACILITY
DOÑA ANA COUNTY, NEW MEXICO
EPA ID #NM08800019434
HWB-NASA-18-004**

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) *Revised WSTF [White Sand Test Facility] Septic Tanks (SWMUs 21-27) Investigation Report* (Report), dated May 18, 2021. NMED has completed its review of the Report and hereby issues this Approval with the following modifications.

MODIFICATIONS

1. Section 9.0, Recommendations, Page 29

NMED Comment: The WSTF Permit renewal is currently in process; therefore, corrective action status review for SWMUs 21 through 27 is not appropriate at this time. Corrective action status review can be addressed following completion of the pending Permit renewal and following consultation with NMED, as addressed in the section discussion.

Upon submittal, a petition for a Class 3 permit modification is subject to administrative completeness review and fees outlined 20.4.2.201 New Mexico Administrative Code (NMAC) and process outlined in 40 Code of Federal Regulations 270.42(c) and 20.4.1.900 and 901 NMAC.

In addition to SWMUs 21 through 27, a petition for Class 3 permit modification for the WSTF Septic tanks addressed in the Report must also include the eight septic tanks not currently designated as SWMUs for tracking purposes. Based on NMED review and determination, the additional septic tank sites will be listed in the Permit on the appropriate corrective action status tables as additional SWMUs.

To clarify, the characterization of contamination source areas is currently in progress, and significant uncertainty continues to exist regarding environmental contamination associated with SWMUs, AOCs, and Hazardous Waste Management Units (HWMUs) at WSTF. Therefore, corrective action status determinations for some SWMUs and AOCs may not be appropriate at this time and will be addressed on a case-by-case basis in accordance with the WSTF Permit and NMED's November 2022 *Risk Assessment Guidance for Site Investigations and Remediation* (as updated). Post-closure care at the five WSTF HWMUs must continue in accordance with the applicable provisions of the Permit.

No changes to the Report are required in response to this comment.

2. Appendix E, Quality Assurance Report White Sands Test Facility Septic Tanks Soil Analytical Data, Table 7, Quality Assurance Narratives, Pages 5 and 6

NMED Comment: The table header lists TO-15 as the sample analysis method; this is not accurate. Revise Table 7 to indicate the appropriate sample methods used for SWMU 22 soil sample analysis and provide a revised replacement table.

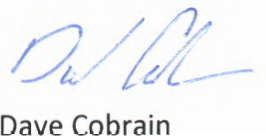
The Permittee must provide replacement pages that address NMED's required modifications. In addition, a response letter that cross-references where the modifications were addressed must be provided. The response letter must also be provided as an electronic copy. Electronic copies of the revised Report and a redline-strikeout version of the Report showing where all changes were made must be submitted to NMED no later than **June 16, 2023**.

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.

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

Sincerely,



Dave Cobrain
Acting Chief
Hazardous Waste Bureau

cc: B. Wear, NMED HWB
G. Acevedo, NMED HWB
L. King, EPA Region 6 (6LCRRC)
A. Sanchez, NASA WSTF

File: NASA 2023 and Reading

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