National Aeronautics and
Space Administration

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

April 10, 2025

Reply to Attn of: RE-25-048

Mr. JohnDavid Nance, 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) Quarterly Environmental Activity Report for First Quarter 2025

Enclosed is the NASA White Sands Test Facility (WSTF) Quarterly Environmental Activity Report for First Quarter 2025. 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 575-524-5460.

Timothy Davis

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Timothy J. Davis
Chief, Environmental Office

3 Enclosures

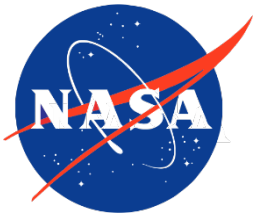
cc:
Ms. Naomi Davidson
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

Executive Summary

The following summarizes important information associated with NASA White Sands Test Facility (WSTF) environmental program activities in the first quarter (January – March) of 2025:

- NASA completed shipments of medical and hazardous waste in January 2025, shipments of hazardous, universal, PCB, and non-hazardous waste in February 2025, and shipments of hazardous and non-hazardous waste in March 2025.
- NASA sampled 46 of 46 groundwater monitoring wells scheduled for January 2025, 65 of 66 wells scheduled for February 2025, and 42 of 42 wells scheduled for March 2025. NASA scheduled 40 groundwater monitoring wells for sampling in April 2025.
- NASA operated the MPITS and PFTS for 19 and 28 days in January 2025, 17 and 28 days in February 2025, and 18 and 22 days in March 2025, respectively.
- NASA initiated project planning and procurement activities related to MPITS upgrades.
- NASA continued supplemental groundwater and soil vapor monitoring in the 400 Area in accordance the NMED-approved plan and provided the monitoring report for the third quarterly monitoring event.
- NASA initiated project planning for Phase IIa of the perched groundwater investigation at the 600 Area and continued extraction of perched groundwater at monitoring well 600-G-138.
- NASA continued addressing NMED comments in the disapproval of the investigation report for the 600 Area wastewater lagoons.
- NASA received NMED's response to the December 13, 2024 *Corrective Action Projects; Proposal to Restructure Priorities and Schedule* and is developing the required response.
- NASA received NMED's February 6, 2025 response to the October 2024 PFAS site inspection report and is developing an investigation work plan to address NMED's 16 comments.
- NASA submitted 20 documents to the NMED Hazardous Waste Bureau in the first quarter of 2025.
- There were no reportable non-compliance issues in January, February, or March 2025.

National Aeronautics and Space Administration



Quarterly Environmental Activity Report

First Quarter 2025

NM8800019434

Report Deadline: April 15, 2025

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

First Quarter 2025

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: 2025.04.10 10:18:16 -06'00'

Timothy J. Davis
Chief, Environmental Office

April 10, 2025
Date

National Aeronautics and Space Administration

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Executive Summary

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- NASA operated the MPITS and PFTS for 19 and 28 days in January 2025, 17 and 28 days in February 2025, and 18 and 22 days in March 2025, respectively.
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- NASA initiated project planning for Phase IIa of the perched groundwater investigation at the 600 Area and continued extraction of perched groundwater at monitoring well 600-G-138.
- NASA continued addressing NMED comments in the disapproval of the investigation report for the 600 Area wastewater lagoons.
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1.0 Waste Management Activities

1.1 NASA completed the following waste shipments in the first quarter of 2025.

Date	Shipped To	Type of Waste	No. of Containers	Amount of Waste
1/6/25	Stericycle, El Paso, TX	Medical/Infectious Waste	1	1.9 kg
1/23/25	Veolia, Henderson, CO	Hazardous (Lab Pack)	17	271 kg
1/23/25	US Ecology, Beatty, NV	Hazardous (Oxidizer Waste)	3	930 kg
1/23/25	Clean Harbors, Aragonite, UT	Hazardous (Fuel Waste)	1	710 kg
2/20/25	Veolia, Henderson, CO	Hazardous (Lab Pack)	12	223 kg
2/20/25	US Ecology, Beatty, NV	Hazardous	2	22 kg
2/20/25	Veolia, Phoenix, AZ	Universal; PCB	12	713 kg
2/25/25	W. Silver, Canutillo, TX	Non-hazardous scrap metal	4	30,871kg
3/20/25	Veolia, Henderson, CO	Hazardous (Lab Pack)	6	142 kg
3/20/25	US Ecology, Beatty, NV	Hazardous (Oxidizer Waste)	4	642 kg
3/20/25	Clean Harbors, Aragonite, UT	Hazardous (Fuel Waste)	1	562 kg
3/25/25	W. Silver, Canutillo, TX	Non-hazardous scrap metal	1	2,313 kg

2.0 Environmental Monitoring

2.1 NASA performed sampling at 46 of 46 groundwater monitoring wells and zones scheduled for sampling in January 2025, 65 of 66 wells and zones in February 2025, and 42 of 42 wells and zones in March 2025 in accordance with the approved Groundwater Monitoring Plan. In February 2025, NASA was unable to sample Water FLUTe interval WW-4-419 because the water level appears to have dropped below the sample interval. NASA will monitor the water level at this sampling interval and collect samples if adequate groundwater is available to provide representative samples.

Previous deviations from the planned sampling schedule are described below and have been reported to NMED in previous quarterly reports:

- NASA could not sample well PL-7-480 in August 2022, because the Westbay zone did not produce water. The water level at this location has dropped below this sample port and it cannot be sampled. NASA removed the zone from the sampling schedule in the 2024 GMP update, which was submitted for NMED review on April 29, 2024 and approved with modifications on December 30, 2024.
- Wells BLM-1-435 (scheduled for sampling in April 2021) and PL-3-453 (scheduled for sampling in December 2020) have not been sampled because the water levels are not sufficient for sampling. NASA expects to abandon and replace wells BLM-1-435 and PL-3-453 in accordance with NMED-approved work plans and as indicated in the December 13, 2024 *NASA White Sands Test Facility (WSTF) Corrective Action Projects; Proposal to Restructure Priorities and Schedule*.

2.2 NASA performed other regulatory groundwater sampling requirements as scheduled and as allowed by operational status. NASA did not sample well MPE-8 in the first quarter because it was not operational due to equipment failure. NASA is evaluating the well's equipment and operational capability and will provide updates in future reports.

2.3 NASA developed the April 2025 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

Month	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)
Jan-25	19 of 31	8.5	0.54	0.61	41
Feb-25	19 of 28	8.4	0.54	0.61	49
Mar-25	19 of 31	8.5	0.5	0.55	49

Shutdown Date	Restart Date	Shutdown Status	Discussion
1/3/25	1/6/25	Planned	The system was shut down to allow aquifer levels to recover over the weekend.
1/8/25	1/13/25	Planned	The system was shut down to allow aquifer levels to recover over an extended weekend that included a day of mourning for President Carter.
1/17/25	1/21/25	Planned	The system was shut down to allow aquifer levels to recover over an extended weekend that included the Dr. Martin Luther King, Jr. holiday.

Shutdown Date	Restart Date	Shutdown Status	Discussion
1/23/25	1/27/25	Planned	The system was shut down to allow aquifer levels to recover over the long holiday break.
1/31/25	2/3/25	Planned	The system was shut down to allow aquifer levels to recover over the weekend.
2/6/25	2/10/25	Planned	The system was shut down to allow aquifer levels to recover over the weekend.
2/14/25	2/18/25	Planned	The system was shut down to allow aquifer levels to recover over an extended weekend that included the President's Day holiday.
2/20/25	2/24/25	Planned	The system was shut down to allow aquifer levels to recover over the weekend.
3/1/25	3/3/25	Planned	The system was shut down to allow aquifer levels to recover over the weekend.
3/4/25	3/4/25	Unplanned	The system shut down automatically because of a communication loss.
3/6/25	3/10/25	Planned	The system was shut down to allow aquifer levels to recover over the weekend.
3/14/25	3/18/25	Planned	The system was shut down to allow aquifer levels to recover over the weekend and to support a planned electrical power outage.
3/20/25	3/24/25	Planned	The system was shut down to allow aquifer levels to recover over the weekend.
3/28/25	3/31/25	Planned	The system was shut down to allow aquifer levels to recover over the weekend.

3.2 Plume Front Treatment System Operations

Month	Days Operated	Average Flow Rate (gpm)	Volume Extracted and Treated (acre-feet)	Volume Injected (acre-feet)	Volume Discharged to Grade (acre-feet)	Volume Discharged to Modu-Tank (acre-feet)
Jan-25	28 of 31	632	85.4	85.5	0.39	0.005
Feb-25	28 of 28	805	85.4	85.5	0.39	0.005
Mar-25	23 of 31	800	67.7	67.9	0.43	0.001

Shutdown Date	Restart Date	Shutdown Status	Discussion
1/6/25	1/6/25	Unplanned	The system shut down automatically because of a communication loss.

Shutdown Date	Restart Date	Shutdown Status	Discussion
1/12/25	1/13/25	Unplanned	The system shut down automatically because of a leak detection alarm.
1/14/25	1/14/25	Unplanned	The system shut down automatically because of a leak detection alarm.
1/19/25	1/21/25	Unplanned	The system shut down automatically because of a leak detection alarm and was left offline to dry condensate within a piping section.
1/21/25	1/22/25	Unplanned	The system shut down automatically because of a leak detection alarm and was left offline to dry condensate within a piping section.
1/24/25	1/27/25	Unplanned.	The system shut down automatically because of a communication loss.
3/15/25	3/18/25	Unplanned/ Planned	The system shut down automatically because of an unplanned disruption in the electrical power supply. NASA left the system offline to accommodate a subsequent planned electrical power outage.
3/20/25	3/24/25	Planned	NASA shut the system down to investigate anomalous vibration and noise originating from an air stripper blower motor.
3/25/25	3/27/25	Unplanned	The system shut down automatically because of low flow following the failure of a motor starter at well PFE-2.
3/28/25	4/1/25	Unplanned/ Planned	The system shut down automatically because of low air flow through an air stripper. NASA left the system offline to accommodate a subsequent planned electrical power outage.

3.3 MPITS Upgrades

In the *Remediation System Monitoring Plan Annual Update for 2024*, submitted on July 23, 2024 and approved by NMED on December 30, 2024, NASA informed NMED of the intent to activate former exploration wells MPE-3 and MPE-4 and incorporate them into the MPITS. In that monitoring plan, NASA indicated that well activation was expected in January 2025. NASA has initiated the project to activate these two wells and has acquired most of the materials and equipment required to complete the project. However, several downhole components were not readily available, which has delayed installation of the pumping systems in these wells and their subsequent activation. NASA expects that all equipment will be available in April 2025 and that equipment installation and well activation will follow immediately in late April or early May 2025.

3.4 200 Area Investigation

- NMED is reviewing the follow-on *200 and 600 Area Vapor Monitoring and Intrusion Assessment (VMIA) Abbreviated Investigation Work Plan (AIWP)* (November 16, 2024).

- NMED approved the *WSTF 2024 Soil Vapor RBC (Risk-based Concentration) Memorandum* (September 27, 2024) on February 4, 2025. NASA is reviewing the comments and revising the memo accordingly. The response is due to NMED by April 30, 2025.

3.5 300/400 Area

- NMED is reviewing the *Well Completion Reports (WCR) for NASA White Sands Test Facility (WSTF) 400-001-GW* (August 30, 2024), the *Well Completion Report (WCR) for NASA White Sands Test Facility (WSTF) 300-001-GSV* (October 3, 2024), and the *Well Completion Report (WCR) for NASA White Sands Test Facility (WSTF) 300-002-GSV* (October 3, 2024).
- NASA continued soil vapor and groundwater monitoring activities in the 400 Area in accordance with the NMED-approved *400 Area Supplemental Groundwater and Soil Vapor Monitoring Plan* (July 11, 2023). NASA received and reviewed data from the third quarter soil vapor and groundwater monitoring event performed between August 26 and 28, 2024, prepared the associated report, and submitted *the 400 Area Supplemental Groundwater and Soil Vapor Monitoring Report – Third Quarter 2024* on February 25, 2025. Soil vapor samples from the initial monitoring event performed at wells 300-001-GSV and 300-002-GSV on December 12, 2024 exceeded 30-day holding times at the contracted analytical laboratory due to rolling power outages in California in January 2025. The wells were resampled on February 19, 2025 and NASA is receiving and reviewing analytical data in preparation for the fourth quarterly report.
- NMED is reviewing the *Resubmittal of NASA White Sands Test Facility (WSTF) 400 Area Supplemental Groundwater and Soil Vapor Monitoring Report – First Quarter 2024* (September 5, 2024) and the *NASA White Sands Test Facility (WSTF) 400 Area Supplemental Groundwater and Soil Vapor Monitoring Report – Second Quarter 2024* (November 26, 2024).

3.6 600 Area Perched Groundwater Extraction Pilot Test and Investigation

- In January, February, and March 2025, NASA extracted approximately 89, 196, and 217 gallons of perched groundwater, respectively, 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*, bringing the total to 23,136 gallons of contaminated groundwater since the project began. Groundwater elevation measurements indicate there is approximately 2.92 feet of perched groundwater within this well. This perched groundwater thickness has been relatively consistent since the inception of extraction activities in 2013. Extracted groundwater was containerized for treatment at the Mid-plume Interception and Treatment System (MPITS) and discharged in accordance with DP-1255.
- On November 5, 2024, NMED approved the *600 Area Perched Groundwater Phase II Abbreviated Investigation Work Plan* (November 27, 2023). In the first quarter of 2025, NASA initiated project planning for Phase IIa of the project, which is expected to begin in April 2025.
- NMED is reviewing the *Proposal to Transition NASA White Sands Test Facility (WSTF) 600 Area Perched Groundwater Extraction Pilot Test (PGEPT) Annual Reporting into Projected Targeted Mobile Remediation Process (TMRP) Annual Reporting Following Submittal of the PGEPT – Project Year 12 Report* (February 19, 2025).

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

- NMED disapproved the *Response to Disapproval of 600 Area Lagoons (SWMU 34) IR and Risk Assessment* (February 21, 2024) on December 9, 2024. NMED directed NASA to address 18 comprehensive comments and provide a revised report no later than March 31, 2025. NASA submitted the *Response to Second Disapproval of the NASA White Sands Test Facility (WSTF) 600 Area Wastewater Lagoons Closure (SWMU 34) Investigation Report* on March 28, 2025.

- NMED is reviewing the *Response to Disapproval of NASA White Sands Test Facility (WSTF) 200 Area Wastewater Lagoons Closure (SWMU 8) Investigation Report* (April 29, 2024) and *the Response to Disapproval of the NASA WSTF 100 Area Wastewater Lagoons Closure (SWMU 2) Investigation Report* (August 29, 2024).
- As indicated in the NMED-approved *NASA White Sands Test Facility (WSTF) STGT Wastewater Lagoons Closure (AOC 51) Investigation Report* (November 20, 2023), no further investigation work is required at AOC 51. The unit is expected to be included in an upcoming petition for corrective action complete status determination.

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

- As indicated in the *Response to Approval with Modifications of the NASA WSTF 200 Area HWTL (SWMU 10) Investigation Report and Risk Assessment Report* (December 27, 2023), no further investigation work is required at SWMU 10. The unit is expected to be included in an upcoming petition for corrective action complete status determination.

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

- NMED is reviewing the *NASA WSTF 600 Area Bureau of Land Management Off-Site Pile (SWMU 16) Remedy Completion Report and Risk Screen Evaluation* (November 19, 2024).

3.10 SWMUs 21-27 (Septic Tanks) and SWMUs 30 & 31 (Small Arms Firing Ranges)

- NMED is reviewing a permit modification request (*NASA White Sands Test Facility Petition for Corrective Action Status Review*) (October 23, 2024).

3.11 SWMU 29 (Small Arms Firing Ranges)

- As indicated in the NMED-approved *NASA White Sands Test Facility (WSTF) STGT Wastewater Lagoons Closure (AOC 51) Investigation Report* (September 3, 2024), no further investigation work is required at SWMU 29. The unit is expected to be included in an upcoming petition for corrective action complete status determination.

3.12 SWMU 33 (Test Stand 302 Cooling Water Pond)

- In accordance with the NMED-approved *NASA WSTF 300 Area Test Stand 302 Cooling Water Pond (SWMU 33) Investigation Work Plan and Historical Information Summary* (revised on April 26, 2024), a final investigation report is to be submitted to NMED no later than May 31, 2025. In the December 13, 2024 *Corrective Action Projects; Proposal to Restructure Priorities and Schedule*, NASA proposed postponing investigation fieldwork to at least government fiscal year 2027 because of current budget restrictions. NMED responded to NASA's proposal on February 3, 2025 with specific direction to submit a request for extension of time for submittal of the investigation report no later than April 30, 2025.

3.13 SWMU 49 (700 Area Landfill)

- NMED approved the *700 Area (SWMU 49) Landfill Phase II Work Plan* (October 25, 2023) with modifications on July 31, 2024. NMED directed NASA to address two comments and submit a revised work plan no later than October 31, 2024. NASA submitted the *Response to Approval with Modifications of the NASA White Sands Test Facility (WSTF) 700 Area Landfill (SWMU 49) Phase II Abbreviated Investigation Work Plan* on October 30, 2024. In the December 13, 2024 *Corrective Action Projects; Proposal to Restructure Priorities and Schedule*, NASA proposed postponing the Phase 2 investigation to at least government fiscal year 2026 because of current budget restrictions. NMED responded to NASA's proposal on February 3, 2025 with specific direction to submit a request for extension of time for

completion of the investigation and submittal of the investigation report no later than April 30, 2025.

3.14 SWMU 54 (500 Area Former Oxidizer Burner)

- NMED is reviewing the *500 Area Former Oxidizer Burning (SWMU 52) Investigation Report* (July 25, 2024).

3.15 Groundwater Monitoring Well Abandonment, Installation, and Reconfiguration

- NMED is reviewing the *Response to the Disapproval of Reconfiguration Report for Well BW-4* (November 21, 2024).
- NMED is reviewing the *Response to Disapproval of the NASA WSTF Westbay Well Reconfiguration Work Plan for Wells PL-7, PL-8, PL-10, ST-5, and WW-3* (August 30, 2024).
- In the December 13, 2024 *Corrective Action Projects; Proposal to Restructure Priorities and Schedule*, NASA recommended a longer-term schedule for currently approved well replacement and/or installation projects. NMED responded to NASA's proposal on February 3, 2025 with specific direction to submit a request for extension of time for well installations and related well completion reports no later than April 30, 2025.

3.16 Targeted Mobile Remediation Process (TMRP)

- Based on funding and resource limitations, NASA proposed an alternate schedule for implementation of Phase II of TMRP in the December 13, 2024 *Corrective Action Projects; Proposal to Restructure Priorities and Schedule*. NMED responded to NASA's proposal on February 3, 2025 with specific direction to submit a request for extension of time for performing the pilot test no later than April 30, 2025.

3.17 Groundwater Data Representativeness Evaluation

- NMED is reviewing the *Groundwater Data Representativeness Phase 2 Disapproval Response: Water FLUTe Well Evaluation Abbreviated Investigation Report* (July 31, 2024).

3.18 400 Area Isopropyl Alcohol Release

- In response to NASA's November 13, 2024 *NASA White Sands Test Facility (WSTF) Follow Up Notification for an Isopropyl Alcohol Release*, NMED directed NASA to provide a work plan for investigation of the release no later than February 28, 2025. NASA submitted the *400 Isopropyl Alcohol Release Abbreviated Investigation Work Plan* on February 24, 2025.

3.19 Dye Tracer Test Investigation

- In the December 13, 2024 *Corrective Action Projects; Proposal to Restructure Priorities and Schedule*, NASA proposed an alternate schedule for the installation of groundwater monitoring wells required by NMED based on the results of the groundwater dye tracer test performed in the WSTF 200/600 Areas and the Mid-plume Constriction Area. NMED responded to NASA's proposal on February 3, 2025 with specific direction to submit a request for extension of time for well installation and reporting no later than April 30, 2025.

3.20 PFAS Investigation

- In conjunction with NASA's November 25, 2024 *Response to Approval with Modifications NASA WSTF Periodic Monitoring Report – Fourth Quarter 2023*, NASA provided the *Per- and Polyfluoroalkyl Substances Site Inspection Report for White Sands Test Facility*, prepared by Tetra Tech, Inc. and dated October 2024. NMED reviewed the site inspection report and

provided a response with 16 informal comments on February 6, 2025. NASA is evaluating NMED's comments and developing an investigation work plan to address NMED's comments and requirement for additional PFAS assessment at WSTF.

4.0 Non-compliance Issues

The NASA RCRA 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 the first quarter of 2025

- *Exception Report of the 45-day Exceedance on Return of Hazardous Waste Shipping Manifest 024161908JJK*, January 7, 2025
- *NASA White Sands Test Facility (WSTF) Annual Waste Accumulation Areas Location Map*, January 8, 2025
- *NASA White Sands Test Facility (WSTF) Quarterly Environmental Activity Report for Fourth Quarter 2024*, January 14, 2025
- *Response to Approval with Modifications for the PFAS Well Completion Report*, January 15, 2025
- *Fee Assessment for the 600 Area Bureau of Land Management Off-Site Soil Pile (SWMU 16) Remedy Completion Report (NMED Invoice Number HWB-NASA-24-015)*, January 30, 2025
- *NASA WSTF Periodic Monitoring Report – Fourth Quarter 2024*, January 30, 2025
- *Fee Assessment for the 200/600 Area Vapor Intrusion Assessment Abbreviated Investigation Work Plan (NMED Invoice Number HWB-NASA-24-017)*, February 13, 2025
- *Fee Assessment for the Periodic Monitoring Report for Fourth Quarter 2024 (NMED Invoice Number HWB-NASA-25-001)*, February 13, 2025
- *Fee Assessment for the 400 Area Supplemental Groundwater and Soil Vapor Monitoring Report Second Quarter 2024 (NMED Invoice Number HWB-NASA-24-016)*, February 19, 2025
- *PGEPT 2025 Transition to TMRP Reporting Proposal*, February 19, 2025
- *Fee Assessment of the NASA WSTF Petition for Class 3 Permit Modification for Corrective Action Status Review SWMUs 21-27, 30 and 31 (NMED Invoice Number HWB-NASA-24-018)*, February 19, 2025
- *NASA White Sands Test Facility (WSTF) 400 Isopropyl Alcohol Release Abbreviated Investigation Work Plan*, February 24, 2025
- *NASA White Sands Test Facility (WSTF) 400 Area Supplemental Groundwater and Soil Vapor Monitoring Report – Third Quarter 2024*, February 25, 2025

- *Response to Approval with Modifications of NASA WSTF Groundwater Monitoring Plan Update for 2024*, February 28, 2025
- *Response to Approval with Modifications for NASA WSTF Periodic Monitoring Report – First Quarter 2024*, March 14, 2025
- *Fee Assessment for the 400 Area Isopropyl Alcohol Release Abbreviated Investigation Work Plan (NMED Invoice Number HWB-NASA-25-003)*, March 18, 2025
- *Response to Approval with Modifications of NASA WSTF Remediation System Monitoring Plan Annual Update for 2024*, March 20, 2025
- *Fee Assessment for the 400 Area Supplemental Groundwater and Soil Vapor Monitoring Report Third Quarter 2024 (NMED Invoice Number HWB-NASA-25-002)*, March 25, 2025
- *Submittal of NASA White Sands Test Facility (WSTF) Statistical Units Evaluation as an addendum to the Response to Approval with Modifications of the NASA White Sands Test Facility (WSTF) Background Groundwater Study Investigation Report*, March 27, 2025
- *Response to Second Disapproval of the NASA White Sands Test Facility (WSTF) 600 Area Wastewater Lagoons Closure (SWMU 34) Investigation Report*, March 28, 2025

5.2 Pertinent documents submitted to other NMED bureaus in the first quarter of 2025

- *NASA White Sands Test Facility (WSTF) NSPS Dc Semi-annual Report for Period July 1 through December 31, 2024*, Air Quality Bureau, January 15, 2025
- *NASA White Sands Test Facility 700 Area Landfill Detection Monitoring Results for 2024 Second Semi-annual Sampling Event*, Solid Waste Bureau, January 17, 2025
- *NMED Routine Report NESHAP Report - Source Reporting (FF)*, Air Quality Bureau, January 17, 2025
- *NASA White Sands Test Facility (WSTF) Discharge Permit (DP)-697 Second Semi-Annual Report for 2024*, Ground Water Quality Bureau, January 17, 2025
- *NASA White Sands Test Facility (WSTF) Discharge Permit (DP)-392 Second Semi-Annual Report for 2024*, Ground Water Quality Bureau, January 17, 2025
- *NASA White Sands Test Facility (WSTF) Discharge Permit (DP)-584 Second Semi-Annual Report for 2024*, Ground Water Quality Bureau, January 17, 2025
- *Notice of Exemption for Emergency Generator at Building 440*, Air Quality Bureau, January 23, 2025
- *NASA White Sands Test Facility (WSTF) Discharge Permit (DP)-1170 Second Semi-Annual Report for 2024*, Ground Water Quality Bureau, January 23, 2025
- *NASA White Sands Test Facility (WSTF) Semi-annual Report for Discharge Permit (DP)-1255 – Second Half of 2024*, Ground Water Quality Bureau, January 30, 2025
- *Solid Waste Management Annual Report White Sands Test Facility (WSTF) 700 Area Post-Closure Solid Waste Landfill for 2024*, Solid Waste Bureau, February 3, 2025
- *2025 Air Quality Bureau Annual Minor Source Permit Fee for the NASA White Sands Test Facility (WSTF)*, Air Quality Bureau, February 19, 2025
- *Minor Source Emissions Inventory for CY2024*, Air Quality Bureau, March 12, 2025

- *Quarterly Opacity/Emissions Eval of 400 Area Boilers (Units 1A, 1B, 1C, and 1D)*, Air Quality Bureau, March 19, 2025
- *NASA White Sands Test Facility - FF First Quarter 2025 Disinfectant Residual Monitoring Report*, Drinking Water Bureau on March 26, 2025

5.3 Status of documents previously submitted to the NMED Hazardous Waste Bureau for which additional correspondence was recorded in the first quarter of 2025

- NASA submitted the *NASA WSTF 600 Area Bureau of Land Management Off-Site Pile (SWMU 16) Remedy Completion Report and Risk Screen* Evaluation on November 19, 2024. NASA received NMED's January 7, 2025 fee assessment for review of the report and provided the $8,500 review fee on January 30, 2025.
- NASA submitted the *NASA White Sands Test Facility (WSTF) 400 Area Supplemental Groundwater and Soil Vapor Monitoring Report – Second Quarter* 2024 on November 26, 2024. NASA received NMED's January 7, 2025 fee assessment and invoice for review of the report and provided the $3,000 review fee on February 19, 2025. NASA submitted the *NASA White Sands Test Facility (WSTF) 400 Area Supplemental Groundwater and Soil Vapor Monitoring Report – Third Quarter 2024* on February 25, 2025. NASA received NMED's March 11, 2025 fee assessment and invoice for review of the report and provided the $3,000 review fee on March 25, 2025.
- NASA submitted the *Response to Disapproval of 600 Area Lagoons (SWMU 34) IR and Risk Assessment* on February 21, 2024. NMED disapproved the revised report on December 9, 2024 and directed NASA to address 18 comments and submit a revised report no later than March 31, 2024. NASA submitted *the Response to Second Disapproval of the NASA White Sands Test Facility (WSTF) 600 Area Wastewater Lagoons Closure (SWMU 34) Investigation Report* on March 28, 2025.
- NASA submitted the *Background Groundwater Study Investigation Report* on July 27, 2023. NASA received NMED's September 6, *2023 Fee Assessment Background Groundwater Study Investigation Report* and provided the $5,000 review fee on September 18, 2023. NMED approved the report with modifications on May 6, 2024. NMED directed NASA to address three comments and submit a revised report no later than July 31, 2024. NASA submitted the *Response to Approval with Modifications of the NASA White Sands Test Facility (WSTF) Background Groundwater Study Investigation Report* on July 30, 2024. As indicated in that submittal, NASA provided additional information in the *Submittal of NASA White Sands Test Facility (WSTF) Statistical Units Evaluation as an addendum to the Response to Approval with Modifications of the NASA White Sands Test Facility (WSTF) Background Groundwater Study Investigation Report* on March 27, 2025.
- NASA submitted the *NASA White Sands Test Facility (WSTF) Well Completion Report for PFAS Site Investigation Well Completion Summary Report* on March 29, 2024. NASA received NMED's May 7, 2024 fee assessment and invoice for review of the report and provided the $6,000 review fee on May 21, 2024. NMED approved the report with modifications on November 5, 2024 and directed NASA to address a comment and submit a revised report no later than January 31, 2025. NASA submitted the *Response to Approval with Modifications for the PFAS Well Completion Report* on January 15, 2025.
- NASA submitted the *Response to Approval with Modifications NASA WSTF Periodic Monitoring Report – Fourth Quarter 2023* on November 25, 2024. In conjunction with that report, NASA provided the *Per- and Polyfluoroalkyl Substances Site Inspection Report for White Sands Test Facility*, prepared by Tetra Tech, Inc. and dated October 2024. NMED

reviewed the site inspection report and provided informal comments on February 6, 2025. NMED provided 16 comments regarding additional PFAS investigation requirements. NASA is evaluating NMED's comments and developing an investigation work plan for additional site assessment for PFAS at WSTF.

- NASA submitted the *NASA WSTF Periodic Monitoring Report – First Quarter 2024* on May 23, 2024. NASA received NMED's July 11, 2024 fee assessment and invoice for review of the report and provided the $5,000 review fee on August 6, 2024. NMED approved the report with modifications on December 30, 2024. NMED directed NASA to address three comments and submit a revised report no later than March 30, 2025. NASA submitted the *Response to Approval with Modifications for NASA WSTF Periodic Monitoring Report – First Quarter 2024* on March 14, 2025.
- NASA submitted the *Response to Administratively Incomplete Determination Petition for Corrective Action Status Review White Sands Test Facility SWMUs 21-27, 30, and 31* on October 23, 2024. NASA received NMED's January 14, 2025 fee assessment and invoice for review of the permit modification request and provided the $37,500 review fee on February 19, 2025.
- NASA submitted the *NASA WSTF Groundwater Monitoring Plan Update for 2024* on April 29, 2024. NASA received NMED's July 2, 2024 fee assessment and invoice for review of the plan and provided the $10,000 review fee on July 18, 2024. NMED approved the plan with modifications on December 30, 2024. NMED directed NASA to address two NMED comments and submit a revised plan update no later than February 28, 2025. NASA submitted the *Response to Approval with Modifications of NASA WSTF Groundwater Monitoring Plan Update for 2024* on February 28, 2025.
- NASA submitted the *NASA White Sands Test Facility (WSTF) 2024 Soil Vapor Risk Based Concentrations (RBCs) Memorandum* on September 27, 2024. NASA received NMED's October 15, 2024 fee assessment and invoice for review of the report and provided the $14,000 review fee on October 30, 2024. NMED approved the memorandum with a modification on February 4, 2025. NMED directed NASA to address a comment and submit a revised memorandum no later than April 30, 2025.
- NASA submitted the *NASA WSTF Remediation System Monitoring Plan Annual Update for 2024* on July 23, 2024. NASA received NMED's August 7, 2024 fee assessment and invoice for review of the plan update and provided the $10,000 review fee on August 15, 2024. NMED approved the plan with modifications on December 30, 2025. NMED directed NASA to address four comments and submit a revised plan update by March 28, 2025. NASA submitted the *Response to Approval with Modifications of NASA WSTF Remediation System Monitoring Plan Annual Update for 2024* on March 20, 2025.
- NASA submitted the *NASA WSTF Periodic Monitoring Report – Second Quarter 2024* on July 30, 2024. NASA received NMED's August 7, 2024 fee assessment and invoice for review of the report and provided the $5,000 review fee on August 15, 2024. NMED approved the report with modifications on February 3, 2025. NMED directed NASA to address two comments and submit a revised report no later than April 30, 2025.
- NASA notified NMED of a release of isopropyl alcohol in the WSTF 400 Area using the NMED online release reporting portal (Incident #18546) and via email on October 18, 2024. NASA submitted the *NASA White Sands Test Facility (WSTF) Written Release Notification 5-day Spill Report following 24-hour Notification (Incident #18573)* on October 23, 2024 and the *NASA White Sands Test Facility (WSTF) Follow Up Notification for an Isopropyl Alcohol Release* on November 13, 2024. NMED responded to the follow-up notification on December

19, 2024 with direction for NASA to provide a work plan for investigation of the release no later than February 28, 2025. NASA submitted the *NASA White Sands Test Facility (WSTF) 400 Isopropyl Alcohol Release Abbreviated Investigation Work Plan* on February 25, 2025. NASA received NMED's March 11, 2025 fee assessment and invoice for review of the work plan and provided the $5,000 review fee on March 18, 2025.

- NASA submitted the *200 and 600 Area Vapor Monitoring and Intrusion Assessment (VMIA) Abbreviated Investigation Work Plan (AIWP)* on November 26, 2024. NASA received NMED's January 7, 2025 fee assessment and invoice for review of the work plan and provided the $3,500 review fee on February 13, 2025.
- NASA submitted the *NASA White Sands Test Facility (WSTF) Corrective Action Projects; Proposal to Restructure Priorities and* Schedule on December 13, 2024. NMED responded to the proposal on February 3, 2025 with direction for NASA to submit several requests for extensions of time and additional work plans no later than April 30, 2025.
- *NASA White Sands Test Facility (WSTF) 2025 Soil Vapor Risk Based Concentrations (RBCs) Memorandum – Request for Non-submission by January 31,* 2025 on December 24, 2024. NMED approved the request on February 4, 2025, authorizing NASA to suspend submittal of the 2025 RBC memo and submit the next annual RBC update no later than January 31, 2026.
- NASA submitted the *NASA WSTF Periodic Monitoring Report – Fourth Quarter 2024* on January 30, 2025. NASA received NMED's February 4, 2025 fee assessment and invoice for review of the report and provided the $5,000 review fee on February 13, 2025.