National Aeronautics and
Space Administration

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

July 14, 2025

Reply to Attn of: RE-25-094

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 Second Quarter 2025

Enclosed is the NASA White Sands Test Facility (WSTF) Quarterly Environmental Activity Report for Second 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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Date: 2025.07.14 11:52:55 -06'00'

Timothy J. Davis
Chief, Environmental Office

3 Enclosures

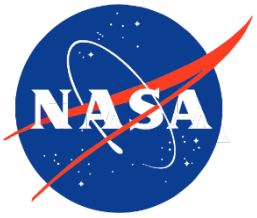
cc:
Ms. Melissa Milner
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

Executive Summary

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

- NASA completed shipments of hazardous waste in April 2025, shipments of hazardous, medical, and non-hazardous waste in May 2025, and shipments of hazardous, universal, and TSCA waste in June 2025.
- NASA sampled 52 of 53 groundwater monitoring wells scheduled for April 2025, 42 of 44 wells scheduled for May 2025, and 44 of 44 wells scheduled for June 2025. NASA scheduled 36 groundwater monitoring wells for sampling in July 2025.
- NASA operated the MPITS and PFTS for 20 and 30 days in April 2025, 15 and 15 days in May 2025, and 21 and 23 days in June 2025, respectively.
- NASA completed project planning and procurement activities related to MPITS upgrades and initiated upgrade fieldwork.
- NASA completed supplemental groundwater and soil vapor monitoring in the 400 Area in accordance the NMED-approved plan and provided the monitoring report for the fourth and final quarterly monitoring event.
- NASA performed fieldwork for Phase IIa of the perched groundwater investigation at the 600 Area, provided the Phase IIa report, and continued extraction of perched groundwater at monitoring well 600-G-138.
- NASA addressed NMED comments in the disapproval of the investigation report for the 600 Area wastewater lagoons and submitted a revised report.
- NASA received NMED's response to the December 13, 2024 *Corrective Action Projects; Proposal to Restructure Priorities and Schedule* and provided the required response. NASA also submitted several written requests for extension of time as directed by NMED.
- NASA continued developing an investigation work plan to address NMED's 16 comments in the February 6, 2025 response to NASA's October 2024 PFAS site inspection report.
- NASA submitted 26 documents to the NMED Hazardous Waste Bureau in the second quarter of 2025.
- There were no reportable non-compliance issues in April, May, or June 2025.

National Aeronautics and Space Administration



Quarterly Environmental Activity Report

Second Quarter 2025

NM8800019434

Report Deadline: July 15, 2025

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

Second 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 Digitally signed by Timothy Davis
Date: 2025.07.14 11:52:35 -06'00'

Timothy J. Davis
Chief, Environmental Office

See Electronic Signature

Date

National Aeronautics and Space Administration

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Las Cruces, NM 88012
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Executive Summary

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

- NASA completed shipments of asbestos, electronic, and hazardous waste in April 2025, shipments of hazardous, medical, and non-hazardous waste in May 2025, and shipments of hazardous, universal, and TSCA waste in June 2025.
- NASA sampled 52 of 53 groundwater monitoring wells scheduled for April 2025, 42 of 44 wells scheduled for May 2025, and 44 of 44 wells scheduled for June 2025. NASA scheduled 36 groundwater monitoring wells for sampling in July 2025.
- NASA operated the MPITS and PFTS for 20 and 30 days in April 2025, 15 and 15 days in May 2025, and 21 and 23 days in June 2025, respectively.
- NASA completed project planning and procurement activities related to MPITS upgrades and initiated upgrade fieldwork.
- NASA completed supplemental groundwater and soil vapor monitoring in the 400 Area in accordance the NMED-approved plan and provided the monitoring report for the fourth and final quarterly monitoring event.
- NASA performed fieldwork for Phase IIa of the perched groundwater investigation at the 600 Area, provided the Phase IIa report, and continued extraction of perched groundwater at monitoring well 600-G-138.
- NASA addressed NMED comments in the disapproval of the investigation report for the 600 Area wastewater lagoons and submitted a revised report.
- NASA received NMED's response to the December 13, 2024 *Corrective Action Projects; Proposal to Restructure Priorities and Schedule* and provided the required response. NASA also submitted several written requests for extension of time as directed by NMED.
- NASA continued developing an investigation work plan to address NMED's 16 comments in the February 6, 2025 response to NASA's October 2024 PFAS site inspection report.
- NASA submitted 26 documents to the NMED Hazardous Waste Bureau in the second quarter of 2025.
- There were no reportable non-compliance issues in April, May, or June 2025.

1.0 Waste Management Activities

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

Date	Shipped To	Type of Waste	No. of Containers	Amount of Waste
4/1/25	SCSWA Corralitos Landfill, Las Cruces, NM	Asbestos Containing Material	1	454 kg
4/3/25	UNICOR	Electronic (Recycle)	47	13,925 kg
4/17/25	US Ecology, Beatty, NV	Hazardous (IDW Debris)	1	11 kg
4/17/25	Veolia, Henderson, CO	Hazardous (Lab Pack)	15	566 kg
4/17/25	US Ecology, Beatty, NV	Hazardous (Unused CCPs)	1	57 kg
5/5/25	SCSWA Corralitos Landfill, Las Cruces, NM	Non-hazardous (IDW from Drilling)	15	3,984 kg
5/13/25	Stericycle, El Paso, TX	Medical/Infectious	1	1 kg
5/22/25	W. Silver, Canutillo, TX	Non-hazardous Scrap Metal (Recycle)	1	1,530 kg
5/22/25	Veolia, Henderson, CO	Hazardous (Lab Pack)	5	150 kg
5/22/25	US Ecology, Beatty, NV	Hazardous (IDW Debris)	2	196 kg
5/22/25	ACT Albuquerque, NM	Hazardous (Spent CCPs)	3	225 kg
5/29/25	Clean Harbors, Aragonite, UT	Hazardous (Fuel Waste)	1	204 kg
5/29/25	Clean Harbors, El Dorado, AR	Hazardous (Fuel Waste)	1	218 kg
6/18/25	Veolia, Henderson, CO	Hazardous (Lab Pack)	5	96 kg
6/18/25	US Ecology, Beatty, NV	Hazardous (IDW Debris)	5	334 kg
6/18/25	Veolia, Phoenix, AZ	Universal	28	604 kg
6/18/25	Veolia, Phoenix, AZ	TSCA	1	81 kg

2.0 Environmental Monitoring

2.1 NASA performed sampling at 52 of 53 groundwater monitoring wells and zones scheduled for sampling in April 2025, 42 of 44 wells and zones in May 2025, and 44 of 44 wells and zones in June 2025 in accordance with the approved Groundwater Monitoring Plan. In April 2025, NASA postponed sampling at well 600-G-138 so groundwater sampling could be performed in conjunction with scheduled soil vapor sampling in the area to support ongoing perched groundwater investigations during May 2025. In May 2025, technical difficulties at wells BW-4-330 and ST-1-473 prevented sampling. NASA resolved those issues late in May 2025 and sampled the two wells in June 2025. Previous deviations from the planned sampling schedule are described below and have been reported to NMED in previous quarterly reports:

- 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 July 2025 groundwater sampling schedule and plans to sample 36 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)
Apr-25	20 of 30	8.0	0.58	0.66	584
May-25	15 of 31	8.1	0.42	0.49	397
Jun-25	21 of 30	6.7	0.48	0.54	34

Shutdown Date	Restart Date	Shutdown Status	Discussion
4/3/25	4/7/25	Planned	The system was shut down to allow aquifer levels to recover over the weekend.
4/8/25	4/8/25	Unplanned	The system shut down automatically because of a disruption in the electrical power supply.

Shutdown Date	Restart Date	Shutdown Status	Discussion
4/11/25	4/14/25	Planned	The system was shut down to allow aquifer levels to recover over the weekend.
4/17/25	4/21/25	Planned	The system was shut down to allow aquifer levels to recover over the weekend.
4/21/25	4/21/25	Unplanned	The system shut down automatically because of a disruption in the electrical power supply.
5/1/25	5/5/25	Planned/ Unplanned	The system shut down automatically because of plugged UV water filters. We left the system offline to allow aquifer levels to recover over the weekend.
5/7/25	5/7/25	Unplanned	The system shut down automatically because of a plugged sump pump.
5/9/25	5/12/25	Planned	The system was shut down to allow aquifer levels to recover over the weekend.
5/15/25	5/19/25	Planned	The system was shut down to allow aquifer levels to recover over the weekend.
5/22/25	5/28/25	Planned	The system was shut down to allow aquifer levels to recover over the extended holiday weekend.
5/30/25	6/2/25	Planned	The system was shut down to allow aquifer levels to recover over the weekend.
6/1/25	6/2/25	Planned	The system was shut down to allow aquifer levels to recover over the weekend.
6/11/25	6/16/25	Unplanned/ Planned	The system shut down automatically because of a disruption in the electrical power supply and was left shut down to allow aquifer levels to recover over the weekend.
6/20/25	6/23/25	Planned	The system was shut down to allow aquifer levels to recover over the weekend.
6/26/25	6/30/25	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)
Apr-25	30 of 30	809	101.6	101.9	0.09	0.002
May-25	15 of 31	809	43.3	43.5	0.78	0.0
Jun-25	23 of 30	810	66.7	67.0	0.54	0.004

Shutdown Date	Restart Date	Shutdown Status	Discussion
4/9/25	4/10/25	Unplanned	The system shut down automatically because of an irregularity in the electrical power supply.
4/10/25	4/10/25	Unplanned	The system shut down automatically because of a communications loss at well PFE-3.
5/1/25	5/15/25	Planned	NASA shut the system down for a planned electrical outage on May 2, 2025. The system was left offline to perform scheduled preventive maintenance.
5/23/25	5/27/25	Unplanned	The system shut down automatically because of low air flow resulting from a compressor fault.
5/27/25	5/28/25	Planned	NASA shut the system down to troubleshoot and repair a faulty Cla-Val at well PFI-2.
6/6/25	6/10/25	Unplanned	The system shut down automatically because of low air flow resulting from a compressor fault.
6/19/25	6/24/25	Unplanned	The system shut down automatically because of low air flow resulting from a compressor fault.

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 initiated the project to activate these two wells in the first quarter of 2025 and reported in the first quarterly report that most of the materials and equipment required to complete the project had been acquired. However, several downhole components were not readily available, which delayed installation of the pumping systems in these wells and their subsequent activation. Pumps, motors, and surface equipment were delivered to WSTF in April 2025 and NASA began system assembly and testing. During May and June 2025, NASA assembled all downhole components, constructed the solar panels to provide electrical power, installed and tested all pumping equipment, and configured and tested flow meters and automatic shutoff devices. NASA expects to mobilize tanker trailers to the two wells and initiate daytime pumping in July 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 reviewed the comments, revised the memo accordingly, and submitted the *Response to Approval with Modification for the NASA White Sands Test Facility (WSTF) 2024 Soil Vapor Risk-Based Concentrations (RBCs) Memorandum* on April 21, 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 completed 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 fourth quarter soil vapor and groundwater monitoring event performed between December 9 and 12, 2024, prepared the associated report, and submitted *the 400 Area Supplemental Groundwater and Soil Vapor Monitoring Report – Fourth Quarter 2024* on May 29, 2025.
- 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), the *NASA White Sands Test Facility (WSTF) 400 Area Supplemental Groundwater and Soil Vapor Monitoring Report – Second Quarter 2024* (November 26, 2024), and the *400 Area Supplemental Groundwater and Soil Vapor Monitoring Report – Third Quarter 2024* (February 25, 2025).

3.6 600 Area Perched Groundwater Extraction Pilot Test and Investigation

- In April, May, and June 2025, NASA extracted approximately 253, 144, and 88 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 23,621 gallons of contaminated groundwater since the project began. Groundwater elevation measurements indicate there is approximately 2.78 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.
- Using pilot test performance data from the twelfth year of the pilot test, NASA prepared and submitted the *600 Area Perched Groundwater Extraction Pilot Test Interim Status Report – Project Year 12* on April 28, 2025.
- On November 5, 2024, NMED approved the *600 Area Perched Groundwater Phase II Abbreviated Investigation Work Plan* (November 27, 2023). In April 2025, NASA completed project planning for Phase IIa of the project. The NASA project team completed all components of Phase IIa investigation fieldwork in April and May 2025. The Groundwater Magnetic Resonance (GMR) survey and colloidal borescope evaluation were performed concurrently between April 21 and 25, 2025. Between April 28 and May 2, 2025, NASA performed aquifer testing comprising a pumping test at groundwater monitoring well 600-G-138 and groundwater elevation monitoring at several nearby wells that were used as piezometers. NASA collected groundwater samples for inter-borehole contaminant analysis on May 5, 2025 and provided the samples to the off-site laboratory for analysis. NASA performed aquifer (slug) testing on individual perched groundwater monitoring wells between May 20 and 23, 2025. NASA received and reviewed project data and initiated preparation of the investigation report, which is due to NMED by July 2, 2025.
- Based on current and future resource availability within the administration, NASA prepared and submitted the *Request for Extension of Time for Submittal of 600 Area Perched Groundwater Phase II Investigation Report* on April 29, 2025. In the letter, NASA requested

that the due date for submittal of the Phase II Investigation Report be extended from December 31, 2025 to September 30, 2028.

- 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 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), the *Response to Disapproval of the NASA WSTF 100 Area Wastewater Lagoons Closure (SWMU 2) Investigation Report* (August 29, 2024), and the *Response to Second Disapproval of the NASA White Sands Test Facility (WSTF) 600 Area Wastewater Lagoons Closure (SWMU 34) Investigation Report* (March 28, 2025).
- 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. NASA submitted the *Request for Extension of Time for Submittal of 300 Area Test Stand 302 Cooling Water Pond (SWMU 33)*

Investigation Report on April 29, 2025. In the letter, NASA requested an extension of time for submittal of the SWMU 33 investigation report to September 30, 2030.

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. NASA submitted the *Request for Extension of Time for Submittal of 700 Area Landfill (SMWU 49) Phase II Investigation Report*. In the letter, NASA requested an extension of time for submittal of the Phase II investigation report to September 30, 2031.

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. On April 29, 2025, NASA submitted requests to extend or defer submittal of well completion report for nine groundwater monitoring wells:
  - *Request for Extension of Time for Submittal of Well Completion Report for Monitoring Well 600C-003-GW*
  - *Request for Extension of Time for Submittal of Well Completion Report for Monitoring Well 600C-004-GW*
  - *Request for Fifth Extension of Time for Submittal of the Completion Report for Monitoring Well BLM-30 Abandonment and Installation of Replacement Monitoring Well BLM-43*
  - *Request for Second Extension of Time for Submittal of Well Completion Report for Monitoring Well 600C-002-GW*
  - *Request to Indefinitely Defer Submittal of Completion Report for Monitoring Wells 200-001-GW, 200-002-GW, and 400-002-GW*
  - *Request to Indefinitely Defer Submittal of the Completion Report for Monitoring Well 600B-001-GW*
  - *Request to Indefinitely Defer Submittal of the Completion Report for Monitoring Well 600C-001-GW*

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. NASA submitted the *Request for Extension of Time for Submittal of Targeted Mobile Remediation Process Phase 2 Interim Status Report* on April 29, 2025. In the letter, NASA requested that the due date for submittal of the first annual interim status report be extended from August 2025 to August 31, 2028.

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

- NMED is reviewing the *400 Isopropyl Alcohol Release Abbreviated Investigation Work Plan* (February 24, 2025).

3.19 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 second quarter of 2025

- *Supplemental Soil Vapor Analytical Data (Appendix G) for the 300-002-GSV Well Completion Report (WCR)*, April 7, 2025
- *Supplemental Soil Vapor Analytical Data (Appendix G) for the 300-001-GSV Well Completion Report (WCR)*, April 7, 2025
- *Response to Approval with Modifications for NASA WSTF Periodic Monitoring Report – Second Quarter 2024*, April 21, 2025

- *Response to Approval with Modification for the NASA White Sands Test Facility (WSTF) 2024 Soil Vapor Risk-Based Concentrations (RBCs) Memorandum*, April 21, 2025
- *NASA WSTF Groundwater Monitoring Plan Update for 2025*, April 25, 2025
- *NASA WSTF Periodic Monitoring Report – First Quarter 2025*, April 28, 2025
- *600 Area Perched Groundwater Extraction Pilot Test Interim Status Report – Project Year 12*, April 28, 2025
- *Corrective Action Projects; Proposal to Restructure Priorities and Schedule*, April 29, 2025
- *Request for Extension of Time for Submittal of Targeted Mobile Remediation Process Phase 2 Interim Status Report*, April 29, 2025
- *Request for Extension of Time for Submittal of 600 Area Perched Groundwater Phase II Investigation Report*, April 29, 2025
- *Request for Extension of Time for Submittal of 700 Area Landfill (SMWU 49) Phase II Investigation Report*, April 29, 2025
- *Request for Extension of Time for Submittal of 300 Area Test Stand 302 Cooling Water Pond (SWMU 33) Investigation Report*, April 29, 2025
- *Request to Indefinitely Defer Submittal of the Completion Report for Monitoring Well 600B-001-GW*, April 29, 2025
- *Request to Indefinitely Defer Submittal of Completion Report for Monitoring Wells 200-001-GW, 200-002-GW, and 400-002-GW*, April 29, 2025
- *Request to Indefinitely Defer Submittal of the Completion Report for Monitoring Well 600C-001-GW*, April 29, 2025
- *Request for Extension of Time for Submittal of Well Completion Report for Monitoring Well 600C-004-GW*, April 29, 2025
- *Request for Second Extension of Time for Submittal of Well Completion Report for Monitoring Well 600C-002-GW*, April 29, 2025
- *Request for Extension of Time for Submittal of Well Completion Report for Monitoring Well 600C-003-GW*, April 29, 2025
- *Request for Fifth Extension of Time for Submittal of the Completion Report for Monitoring Well BLM-30 Abandonment and Installation of Replacement Monitoring Well BLM-43*, April 29, 2025
- *Abandonment Report for NASA Well PFI-1*, May 8, 2025
- *Fee Assessment for the Periodic Monitoring Report for First Quarter 2025 (NMED Invoice Number HWB-NASA-25-004)*, May 15, 2025
- *Fee Assessment for the NASA WSTF Groundwater Monitoring Plan (NMED Invoice Number HWB-NASA-25-006)*, May 15, 2025
- *Fee Assessment for the NASA WSTF Interim Status Report for 600 Area Perched Groundwater Extraction Pilot Test Project Year 12 (NMED Invoice Number HWB-NASA-25-005)*, May 15, 2025
- *NASA White Sands Test Facility (WSTF) 400 Area Supplemental Groundwater and Soil Vapor Monitoring Report – Fourth Quarter 2024*, May 29, 2025

- *Fee Assessment for the 400 Area Supplemental Groundwater and Soil Vapor Monitoring Report Fourth Quarter 2024 (NMED Invoice Number HWB-NASA-25-008)*, June 25, 2025
- *NASA White Sands Test Facility (WSTF) 600 Area Perched Groundwater Phase IIa Status Report*, June 30, 2025

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

- *NASA White Sands Test Facility (WSTF) Groundwater Treatment Systems Infiltration Basin Totalizer Flow Meter Certificate of Limited Calibration*, Ground Water Quality Bureau, May 23, 2025
- *AST Fee Submittal for FY26*, Petroleum Storage Tank Bureau, June 3, 2025
- *Quarterly Opacity/Emissions Eval of 400 Area Boilers (Units 1A, 1B, 1C, and 1D)*, Air Quality Bureau, June 16, 2025
- *NASA White Sands Test Facility - FF Second Quarter 2025 Disinfectant Residual Monitoring Report*, Air Quality Bureau, June 25, 2025
- *Annual Opacity/Emissions Eval for Emergency Generators*, Air Quality Bureau, June 26, 2025
- *Annual Opacity/Emissions Eval of 300/400 Burners (Units 12A, 12B, 15)*, Air Quality Bureau, June 26, 2025

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

- 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. Based on agency resource limitations, NASA submitted the *Request for Extension of Time for Submittal of 700 Area Landfill (SMWU 49) Phase II Investigation Report* on April 29, 2025.
- NASA submitted the *NASA White Sands Test Facility (WSTF) 400 Area Supplemental Groundwater and Soil Vapor Monitoring Report – Fourth Quarter 2024* on May 29, 2025. NASA received NMED's June 11, 2025 fee assessment and invoice for review of the report and provided the $8,000 review fee on June 25, 2025.
- NASA submitted the *Abbreviated Drilling Work Plan in Response to the NMED Approval with Modification of the Report on Tracer Testing in the WSTF 200/600 Areas and Mid-plume Constriction Area* on December 20, 2022. NASA received NMED's January 23, 2023 fee assessment for review of the work plan and provided the $6,000 review fee on February 23, 2023. NMED approved the work plan with modifications on July 18, 2023 (no response required) and directed NASA to submit a well completion report for the proposed wells no later than February 27, 2024. NASA submitted the *Request for Extension of Time for Submittal of the Groundwater Monitoring Well Completion Report for Wells Downgradient of WSTF 200 and 400 Areas* on February 21, 2024. NMED approved the request on approved the request on March 7, 2024, extending the due date for submittal of the report to December 31, 2024. On July 31, 2024, NASA provided the *Status of Several NASA White Sands Test Facility (WSTF) Abandonment and Well Completion Reports*, in which NASA notified NMED of significant budget restrictions that would curtail the installation of this well. On December 13, 2024, NASA submitted the *NASA White Sands Test Facility (WSTF) Corrective Action Projects; Proposal to Restructure Priorities and Schedule*. In the submittal, NASA provided a proposal to restructure the priorities and schedule of nine planned groundwater monitoring wells, including wells 200-001-GW, 200-002-GW, and 400-002-GW. NMED responded on February

5, 2025 with comments on NASA's December 13, 2024 submittal and direction to submit written time extension requests for the affected projects. In response, NASA submitted the *Corrective Action Projects; Proposal to Restructure Priorities and Schedule* and the *Request to Indefinitely Defer Submittal of Completion Report for Monitoring Wells 200-001-GW, 200-002-GW, and 400-002-GW* on April 29, 2025.

- NASA submitted the *Request for Fourth Extension of Time for Submittal of the Completion Report for Monitoring Well BLM-30 Abandonment and Installation of Replacement Monitoring Well BLM-43* September 15, 2023. NMED approved the request on October 4, 2023, extending the due date for submittal of the well completion report to July 31, 2024. On July 31, 2024, NASA provided the *Status of Several NASA White Sands Test Facility (WSTF) Abandonment and Well Completion Reports*, in which NASA notified NMED of significant budget restrictions that would curtail the installation of this well. On December 13, 2024, NASA submitted the *NASA White Sands Test Facility (WSTF) Corrective Action Projects; Proposal to Restructure Priorities and Schedule*. In the submittal, NASA provided a proposal to restructure the priorities and schedule of nine planned groundwater monitoring wells, including well BLM-43. NMED responded on February 5, 2025 with comments on NASA's December 13, 2024 submittal and direction to submit written time extension requests for the affected projects. In response, NASA submitted the *Corrective Action Projects; Proposal to Restructure Priorities and Schedule* and the *Request for Fifth 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 29, 2025.
- NASA submitted the *Response to Approval with Modifications 600 Area Perched Groundwater Investigation Report* on August 30, 2023 with information related to the required work plan. NASA submitted the *NASA White Sands Test Facility (WSTF) 600 Area Perched Groundwater Phase II Abbreviated Investigation Work Plan* on November 27, 2023. NASA received NMED's January 10, 2024 fee assessment for review of the report and provided the $15,000 review fee on February 5, 2024. NMED approved the work plan on November 5, 2024. Based on agency resource limitations, NASA submitted the *Request for Extension of Time for Submittal of 600 Area Perched Groundwater Phase II Investigation Report* on April 29, 2025. Meanwhile, NASA performed investigation fieldwork associated with Phase IIa of the project and submitted the *NASA White Sands Test Facility (WSTF) 600 Area Perched Groundwater Phase IIa Status Report* on June 30, 2025.
- NASA submitted the *Response to Disapproval of NASA WSTF 300 Area Test Stand 302 Cooling Water Pond (SWMU 33) Investigation Work Plan (IWP) and Historical Information Summary (HIS)* on September 14, 2022. NMED approved the IWP on January 19, 2024 with modifications and directed NASA to address five comments and submit a revised IWP no later than April 30, 2024. NMED also directed NASA to submit the SWMU 33 investigation report no later than May 30, 2025. NASA submitted the *Response to Approval with Modifications for the NASA WSTF 300 Area Test Stand 302 Cooling Water Pond (SWMU 33) Investigation Work Plan and Historical Information Summary* on March 2, 2024. Based on agency resource limitations, NASA submitted the *Request for Extension of Time for Submittal of 300 Area Test Stand 302 Cooling Water Pond (SWMU 33) Investigation Report* on April 29, 2025.
- NASA submitted the *Request for Second Extension of Time for Submittal of the Completion Report for Monitoring Well 600B-001-GW* on September 15, 2023. NMED approved the request on October 4, 2023, extending the due date for submittal of the well completion report to July 31, 2024. On July 31, 2024, NASA provided the *Status of Several NASA White Sands Test Facility (WSTF) Abandonment and Well Completion Reports*, in which NASA notified NMED of significant budget restrictions that would curtail the installation of this well. On December 13, 2024, NASA submitted the *NASA White Sands Test Facility (WSTF) Corrective*

Action Projects; Proposal to Restructure Priorities and Schedule. In the submittal, NASA provided a proposal to restructure the priorities and schedule of nine planned groundwater monitoring wells, including well 600B-001-GW. NMED responded on February 5, 2025 with comments on NASA's December 13, 2024 submittal and direction to submit written time extension requests for the affected projects. In response, NASA the *Corrective Action Projects; Proposal to Restructure Priorities and Schedule* and the *Request to Indefinitely Defer Submittal of the Completion Report for Monitoring Well 600B-001-GW* on April 29, 2025.

- NASA submitted the *Request for Second Extension of Time for Submittal of the Completion Report for Monitoring Well 600C-001-GW* on September 15, 2023. NMED approved the request on October 4, 2023, extending the due date for submittal of the well completion report to July 31, 2024. On July 31, 2024, NASA provided the *Status of Several NASA White Sands Test Facility (WSTF) Abandonment and Well Completion Reports*, in which NASA notified NMED of significant budget restrictions that would curtail the installation of this well. On December 13, 2024, NASA submitted the *NASA White Sands Test Facility (WSTF) Corrective Action Projects; Proposal to Restructure Priorities and Schedule*. In the submittal, NASA provided a proposal to restructure the priorities and schedule of nine planned groundwater monitoring wells, including well 600C-001-GW. NMED responded on February 5, 2025 with comments on NASA's December 13, 2024 submittal and direction to submit written time extension requests for the affected projects. In response, NASA submitted the *Corrective Action Projects; Proposal to Restructure Priorities and Schedule* and the *Request to Indefinitely Defer Submittal of the Completion Report for Monitoring Well 600C-001-GW* on April 29, 2025.
- NASA submitted the *Correction to Targeted Mobile Remediation Process Pilot Test Work Plan, Phase 2* on June 6, 2023. NMED approved the work plan on May 15, 2024. Based on agency resource limitations, NASA submitted the *Request for Extension of Time for Submittal of Targeted Mobile Remediation Process Phase 2 Interim Status Report* on April 29, 2025.
- NASA submitted the *Request for Extension of Time for Submittal of the Completion Report for Monitoring Well 600C-002-GW* September 15, 2023. NMED approved the request on October 4, 2023, extending the due date for submittal of the well completion report to July 31, 2024. On July 31, 2024, NASA provided the *Status of Several NASA White Sands Test Facility (WSTF) Abandonment and Well Completion Reports*, in which NASA notified NMED of significant budget restrictions that would curtail the installation of this well. On December 13, 2024, NASA submitted the *NASA White Sands Test Facility (WSTF) Corrective Action Projects; Proposal to Restructure Priorities and Schedule*. In the submittal, NASA provided a proposal to restructure the priorities and schedule of nine planned groundwater monitoring wells, including well 600C-002-GW. NMED responded on February 5, 2025 with comments on NASA's December 13, 2024 submittal and direction to submit written time extension requests for the affected projects. In response, NASA submitted the *Corrective Action Projects; Proposal to Restructure Priorities and Schedule* and the *Request for Second Extension of Time for Submittal of Well Completion Report for Monitoring Well 600C-002-GW* on April 29, 2025.
- NASA submitted the NA*SA WSTF Remediation System Monitoring Plan Annual Update for 2022* on July 29, 2022. NASA received NMED's August 31, 2022 fee assessment and invoice for review of the report and provided the $10,000 review fee on October 4, 2022. NMED approved the plan with a modification on November 16, 2022 and directed NASA to provide documentation on the abandonment of well PFI-1 within 90 days of the completion of well abandonment. NASA abandoned the well and submitted the *Abandonment Report for NASA Well PFI-1* on May 8, 2025. NASA received NMED's June 11, 2025 fee assessment and invoice for review of the report and processing the payment request.

- NASA submitted the *Response to Approval with Modifications of the NASA WSTF Work Plan for Abandonment of NASA WSTF Well BLM-1-435 and Replacement with Monitoring Well 600C-003-GW* on January 30, 2024. On July 31, 2024, NASA provided the *Status of Several NASA White Sands Test Facility (WSTF) Abandonment and Well Completion Reports*, in which NASA notified NMED of significant budget restrictions that would curtail the installation of this well. On December 13, 2024, NASA submitted the *NASA White Sands Test Facility (WSTF) Corrective Action Projects; Proposal to Restructure Priorities and Schedule*. In the submittal, NASA provided a proposal to restructure the priorities and schedule of nine planned groundwater monitoring wells, including well 600C-004-GW. NMED responded on February 5, 2025 with comments on NASA's December 13, 2024 submittal and direction to submit written time extension requests for the affected projects. In response, NASA submitted the *Corrective Action Projects; Proposal to Restructure Priorities and Schedule,* the *Request for Extension of Time for Submittal of Well Completion Report for Monitoring Well 600C-003-GW*, and *Request for Extension of Time for Submittal of Well Completion Report for Monitoring Well 600C-004-GW* on April 29, 2025.
- NASA submitted the *Request for Extension of Time for Submittal of NASA White Sands Test Facility (WSTF) 2024 Soil Vapor Risk Based Concentrations (RBCs) Memorandum* on June 12, 2024. NMED approved the request on June 20, 2024, extending the due date for submittal of the memo to August 30, 2024. NASA submitted the *Request for Second Extension of Time for Submittal of NASA White Sands Test Facility (WSTF) 2024 Soil Vapor Risk Based Concentrations (RBCs) Memorandum* on August 12, 2024. NMED approved the request on August 15, 2024, extending the due date for submittal of the memo to September 30, 2024. 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 *Response to Approval with Modification for the NASA White Sands Test Facility (WSTF) 2024 Soil Vapor Risk-Based Concentrations (RBCs) Memorandum* on April 21, 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 submitted the *Response to Approval with Modifications for NASA WSTF Periodic Monitoring Report – Second Quarter 2024* on April 21, 2025.
- NASA submitted the *NASA WSTF Periodic Monitoring Report – First Quarter 2025* on April 28, 2025. NASA received NMED's May 5, 2025 fee assessment and invoice for review of the report and provided the $5,000 review fee on May 15, 2025.
- NASA submitted the *NASA WSTF Groundwater Monitoring Plan Update for 2025* on April 25, 2025. NASA received NMED's May 5, 2025 fee assessment and invoice for review of the plan and provided the $10,000 review fee on May 15, 2025.
- NASA submitted the *600 Area Perched Groundwater Extraction Pilot Test Interim Status Report – Project Year 12* on April 28, 2025. NASA received NMED's May 5, 2025 fee assessment and invoice for review of the report and provided the $8,000 review fee on May 15, 2025.