January 22, 2026

Ms. Amanda Skarsgard
NASA Environmental Compliance Manager
National Aeronautics and Space Administration
White Sands Test Facility
P.O. Box 20
Las Cruces, New Mexico 88004-0020
amanda.g.skarsgard@nasa.gov

Attention of: RE-24-120

RE: APPROVAL WITH COMMENT
NASA WHITE SANDS TEST FACILITY (WSTF) 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
NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
JOHNSON SPACE CENTER WHITE SANDS TEST FACILITY
DOÑA ANA COUNTY, NEW MEXICO
EPA ID #NM8800019434
HWB-NASA-21-007

Dear Ms. Skarsgard,

The New Mexico Environment Department (NMED) has received the National Aeronautics and Space Administration Johnson Space Center White Sands Test Facility (Permittee) *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*, dated August 30, 2024. NMED has completed a review of the revised Reconfiguration Work Plan and response and hereby issues this Approval with the following comment.

COMMENT

1. NMED plans to petition the Environmental Improvement Board to add per-and polyfluoroalkyl substances (PFAS) as a State of New Mexico listed hazardous waste.

   Permittee Statement: "Available historical analytical data from the wells…indicated that these wells are located outside of the WSTF contaminant plume and do not contain WSTF contaminants of concern…" thus, the groundwater generated from these monitoring wells would not be subject to regulation as a listed hazardous waste.

   NMED Comment: Well WW-1-452, which is located outside of the WSTF contaminant plume, had a perfluorooctanoic acid (PFOA) concentration of 4.1 nanograms per liter (Second Quarter 2025 Periodic Monitoring Report). WW-1-452 is located hydraulically side-gradient to well WW-3, which is included in the Reconfiguration Work Plan. The revised Reconfiguration Work Plan was submitted in August 2024.

House Bill 140 (HB 140), which codified PFAS associated with aqueous film-forming foam (AFFF) as a hazardous waste, was signed into law on April 9, 2025. Currently, NMED plans to propose amendments to the recently revised hazardous waste management regulations, 20.4.1 NMAC, to require PFAS remediation wastes from AFFF PFAS cleanup sites to be managed as a listed hazardous waste with a waste code of NMF1. Depending upon the outcome of NMED's petition, the permittee may need to evaluate the investigation-derived waste groundwater from all the wells in this workplan to ensure none are in fact generating a listed hazardous waste.

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.

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

Sincerely,

JohnDavid Nance

Digitally signed by JohnDavid Nance
Date: 2026.01.22 10:59:14 -07'00'

JohnDavid Nance
Chief
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB
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