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RYAN FLYNN
Secretary
BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 5, 2014

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

Attention of: RE-E14-087

**RE: APPROVAL WITH MODIFICATIONS
SWMUS 1, 3, AND 15 INVESTIGATION WORK PLAN
NATIONAL AERONAUTICS SPACE ADMINISTRATION (NASA)
JOHNSON SPACE CENTER (JSC) WHITE SANDS TEST FACILITY (WSTF)
DOÑA ANA COUNTY, NEW MEXICO
EPA ID #NM08800019434
HWB-NASA-14-009**

Dear Ms. Bunker-Farrah:

The New Mexico Environment Department (NMED) has received the *SWMUs 1, 3 and 15 Investigation Work Plan and Historical Information Summary (IWP/HIS)*, dated July 2014 and received August 1, 2014. NMED has completed its review of the document and hereby approves the IWP subject to the following modifications.

Modifications

1. The proposed drilling method and borehole depths of 20 to 30 feet below ground surface (bgs) represent a departure from drilling methods and borehole depths used at other site areas since the facility Permit was issued by NMED in late 2009. The rationale used for these departures is cited in the IWP as being justified in Section 17.2.2.b.i of Attachment 17 of the facility Permit. NMED does not concur with the Permittee's interpretation of Section 17.2.2.b.i of Attachment 17 of the facility Permit.

While use of the proposed drilling method and proposed borehole depths may result in collection of soil samples that are more representative of site-specific subsurface conditions (split spoon sampling via use of hollow stem augering or direct push equipment [or a hand auger or direct push equipment in the case of soil samples for analysis of asbestos] thus subjecting the collected soil samples to less elevated temperatures), limiting the proposed soil boring depths may put the Permittee at risk in the event soil contaminants are found in the lower portion(s) of a given boring. This may result in a second mobilization of drilling equipment, collection and analysis of a second set of soil samples from a given borehole location(s) and subsequent preparation and submittal of a second Investigation Report to NMED. See also Modifications 2 and 3 below.

Submit a letter Addendum to the IWP which address NMED's concern about the proposed boring depths in the current IWP.

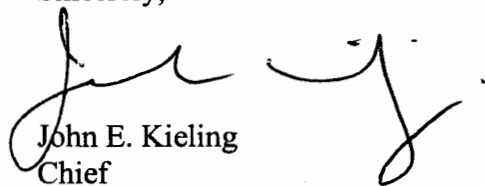
2. The IWP for SWMUs 1, 3, and 15 indicates that 14 borehole locations are proposed in the 100 Area as shown on Figure 2.2 (*100 and 600 Area Soil Boring Location Map*) of the IWP. However, ten boring locations are shown on the figure. NMED suspects that four of the missing boring locations would be located somewhere in the 150 Fire Department Training Area designated as AOI 150. Submit a revised figure which shows all proposed boring locations along with the letter Addendum required in Modification 1 above.
3. Make it clear in the letter Addendum required in Modification 1 above that the term "PFC" used in the IWP will include at a minimum the analytes perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS) and state what the Permittee's expected detection limits are for all compounds analyzed. Additionally, add the analyte category "PFC" to soil samples proposed for collection at the former 600 Area Burn Pit by revising the last page (41) of Table 4.1 (*Summary of Planned Sampling and Analytical Methods*) and include the revised page with the letter Addendum required in Modification 1 above.
4. Evaluate available resources and consider moving the project schedule forward such that the final Investigation Report for SWMUs 1, 3, and 15 is provided to NMED before November 30, 2015. State this revised date in the letter Addendum required in Modification 1 above.

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Submit the above Modifications on or before **October 15, 2014**.

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

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large initial "J" and a long, sweeping tail.

John E. Kieling
Chief
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB
D. Cobrain, NMED HWB
D. Comeau, NMED HWB
R. Isaac, NMED GWQB
J. Dyer, NMED SWB
L. King, EPA 6PD-N
T. Davis NASA WSTF
M. Zigmond, NASA WSTF

File: NASA WSTF 2014 - SWMUs 1, 3, and 15 Investigation Work Plan and Historical Information Summary Approval with Modifications