



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

ENTERED



RYAN FLYNN
Secretary
BUTCH TONGATE
Deputy Secretary

**2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 29, 2015

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

Attention of: RE-15-021

**RE: APPROVAL WITH MODIFICATION
NASA WSTF SMALL ARMS FIRING RANGES (SWMUS 29-31)
ACCELERATED CORRECTIVE ACTION MEASURES WORK PLAN AND
HISTORICAL INFORMATION SUMMARY
NATIONAL AERONAUTICS SPACE ADMINISTRATION (NASA)
JOHNSON SPACE CENTER (JSC) WHITE SANDS TEST FACILITY (WSTF)
DOÑA ANA COUNTY, NEW MEXICO
EPA ID #NM08800019434
HWB-NASA-15-003**

Dear Mr. Davis:

The New Mexico Environment Department (NMED) has received NASA's (the Permittee) *NASA WSTF Small Arms Firing Ranges (SWMUs 29-31) Accelerated Corrective Measures Work Plan and Historical Information Summary* (Plan), dated February 26, 2015 and received March 2, 2015. NMED reviewed the Plan and the Historical Information Summary. NMED does approve Historical Summaries as they are utilized for background information regarding the SWMUs/AOCs. NMED hereby issues this Approval with Modification for the Plan. The Permittee must address the following comment.

Permittee Statement: Section 5.2.4, Soil Samples for Chemical Analysis, page 13. “At times during, and following, the cleanup activities described in Section 5.3, soil samples will be collected for submittal to an off-site chemical analytical laboratory for analysis of COPCs (Table 2.1). After subsamples are composited and prepared as previously described, the required laboratory-provided sample containers will be filled with soil.”

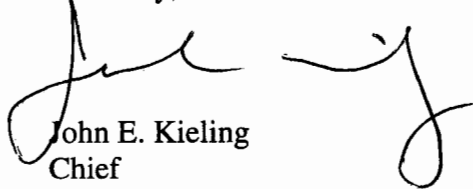
NMED Comment:

The Permittee must not composite confirmation soil samples. Compositing soil samples may result in contaminant concentrations that are not representative of concentrations remaining in the soil. If concentrations are low, compositing may dilute the concentrations of a contaminant to below its threshold detection limit. Additionally, if contamination is indicated in a composited sample, the location of the contamination will not be known. Therefore, the Permittee must collect discrete confirmation samples around perimeter of firing ranges, as well as from the base of the berms and from the floors (i.e., post sifting operations) of each firing range. Field screening (and professional judgment) must be used when choosing the appropriate discrete soil sample locations. The Permittee should bias the discrete sample locations to focus in areas that would be expected to contain higher concentrations of the contaminant of concern. Discrete samples must be collected in addition to the required EPA Method 6200 XRF confirmatory analysis of the proposed composited soil samples.

The Permittee must incorporate this comment into the proposed field work. The Permittee must submit a report summarizing the results of this Accelerated Corrective Action no later than **May 27, 2016**.

If you have any questions regarding this letter, please contact Vicky Baca at (505) 476-6059.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB
D. Cobrain, NMED HWB
K. VanHorn, NMED HWB
R. Isaac, NMED GWQB
J. Dyer, NMED SWB
L. King, EPA 6PD-N
M. Zigmund, NASA WSTF

File: 2015 NASA & Reading File
NASA-15-003