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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 8, 2019

Timothy J. 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-19-100

**RE: APPROVAL WITH MODIFICATIONS
STGT WASTEWATER LAGOONS LINER MANAGEMENT PLAN ADDENDUM
NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
JOHNSON SPACE CENTER WHITE SANDS TEST FACILITY
DOÑA ANA COUNTY, NEW MEXICO
EPA ID #NM08800019434
HWB-NASA-19-017**

Dear Mr. Davis:

The New Mexico Environment Department (NMED) has received the National Aeronautics and Space Administration Johnson Space Center White Sands Test Facility (Permittee) *STGT [Second TDRSS Ground Terminal] Wastewater Lagoons Liner Management Plan Addendum (Addendum)* dated July 11, 2019. NMED has completed review of the Addendum and hereby issues this Approval with the following modifications.

MODIFICATIONS

1. Subsurface Investigation at the STGT Wastewater Lagoons

NMED Comment: As requested, the Permittee may proceed with the subsurface investigation at the STGT Wastewater Lagoons approved by NMED in the October 2012 *Wastewater Lagoon Areas Closure Investigation Work Plan (100, 200, 600 Areas, and STGT)* (Investigation Work Plan). In addition, to increase the opportunity for the collection of subsurface lithologic information and samples for analysis, soil samples must be collected at a minimum of five-foot intervals at each proposed boring location in accordance with the drilling procedure contingency provided in Investigation Work Plan Section 5.1, Drilling Procedures. As dictated by field screening information and observed subsurface conditions, additional soil samples must be collected and analyzed to facilitate complete site characterization and contamination delineation at the STGT wastewater lagoons. No revisions to the Addendum are required in response to this comment.

2. Subsurface Investigation Status Reporting and Schedule

NMED Comment: A status report documenting investigation activities and findings at the STGT Wastewater Lagoons must be submitted following completion of field activities. At a minimum, the status report must include a discussion of the subsurface investigation and proposed lagoon berm sampling activities and findings, plans for any additional investigation or the management strategy necessary to achieve clean closure of the STGT Wastewater Lagoons, sample analysis results tables, laboratory analytical reports, supporting figures, and boring logs. The required status report must be submitted to NMED no later than **May 29, 2020**. No revisions to the Addendum are required in response to this comment.

3. Enclosure 3, Analytes Detected Summary Tables

NMED Comment: The following discrepancies were noted during review of the Addendum and must be corrected as follows:

- a. Sample Location STGT-N-01.003, Semivolatile Organic Compounds [SVOCs] Analysis (Sample No. 1905140802):** The summary table information indicates SVOCs were not detected; however, the laboratory report for the respective data indicates di-n-octylphthalate (0.290 milligrams per kilogram (mg/kg)) and bis(2-ethylhexyl)phthalate (0.218 mg/kg) were detected in the sample. Correct the discrepancy and provide a replacement page(s).

- b. **Sample Location STGT-N-03.003, Volatile Organic Compounds for Toxicity Characteristic Leaching Procedure Analysis (Sample No. 1905140844):** The laboratory report information indicates that tetrachloroethylene was detected in the sample (4.00 micrograms per liter); however, the concentration was not reported on the summary table. Correct the discrepancy and provide a replacement page.
- c. **Sample Location STGT-N-03.003, Total Metals and Mercury Analysis (Sample No. 1905140842):** The metals concentrations for sample location STGT-N-03.003 listed on the table do not match the laboratory report concentration data. Review the sample analysis data, correct the discrepancy and any affected sections of the Addendum, and provide replacement pages.
- d. **Sample Location STGT-S-01.003, Nitrate and Nitrite as N [Nitrogen] Analysis (Sample No. 1905140919):** The nitrate concentration reported for sample STGT-S-01.003 (59 mg/kg) does not correspond to the concentration reported in the respective laboratory report (3.70 mg/kg). Correct the discrepancy and provide a replacement page.
- e. **Sample Location STGT-S-02.003, Semivolatile Organic Compounds Analysis (Sample No. 1905140952):** The laboratory report indicates phenanthrene was detected in the sample (0.00213 mg/kg); however, the concentration was not reported on the summary table. Correct the discrepancy and provide a replacement page.

The noted analytical summary data table discrepancies do not appear to have affected the conclusions of the Addendum; however, the Permittee must ensure that the concentration data provided in the analytical results summary tables for each sample are accurate and complete. Additionally, ensure that the sample analysis report reference pages are also accurate. Correct the Addendum accordingly and provide respective replacement pages.

The Permittee must provide replacement pages that address NMED's modifications to the Addendum. In addition, a response letter that cross-references where the modifications were addressed must be provided. The response letter must also be provided as an electronic copy. An electronic copy of the redline-strikeout version of the Addendum and the revised Addendum must also be submitted to NMED no later than **December 20, 2019**.

The Status Report documenting the results of the STGT Wastewater Lagoons subsurface investigation must be submitted to NMED no later than **May 29, 2020**.

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.

Mr. Davis
October 8, 2019
Page 4

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

Sincerely,

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

John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
G. Acevedo, NMED HWB
L. King, EPA 6LCRRC
A. Skarsgard, NASA WSTF

File: NASA 2019 and Reading