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**NEW MEXICO
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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 22, 2019

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

Attention of: RE-19-152

**RE: APPROVAL
REQUEST FOR A "CONTAINED-IN" DETERMINATION FOR DRILLING FLUID RETURNS
ASSOCIATED WITH MONITORING WELL PL-12
NATIONAL AERONAUTICS AND SPACE ADMINISTRATION JOHNSON SPACE CENTER
WHITE SANDS TEST FACILITY
DOÑA ANA COUNTY, NEW MEXICO
EPA ID #NM08800019434
HWB-NASA-17-020**

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) *Request for a "Contained-In" Determination for Drilling Fluid Returns Associated with Monitoring Well PL-12 Drilling at WSTF [White Sands Test Facility]* (Request), dated October 9, 2019.

The drilling fluid returns were generated during the drilling of replacement monitoring well PL-12 and represent materials generated below the groundwater table within the mapped groundwater contaminant plume. Drilling fluid returns were collected in an 18,000-gallon tank (Container #9251). The drilling fluid returns have been managed as a hazardous waste with Resource Conservation and Recovery Act waste codes F001 and F002.

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Based on the waste characterization sampling results provided with the Request, the drilling fluid returns from monitoring well PL-12 do not exhibit properties of a characteristic hazardous waste as defined in 40 CFR Part 261 Subpart C. Additionally, all applicable 40 CFR Part 261 Subpart D listed hazardous waste (F001 and F002) were not detected above laboratory detection limits. Thallium was the only constituent of concern detected above laboratory detection limits. Waste characterization Toxicity Characteristic Leaching Procedure sample analysis results indicate thallium detections exceeded the New Mexico Water Quality Control Commission's 20.6.2.3103 New Mexico Administrative Code Standards for Groundwater for thallium (0.002 milligrams per liter).

NMED has reviewed the Permittee's Request and determined that the drilling fluid returns may be managed as a non-hazardous waste. Drilling fluid returns (liquids and solids) must be disposed at an appropriate waste disposal facility.

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

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
G. Acevedo, NMED HWB
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File: NASA WSTF 2019 and Reading