

National Aeronautics and
Space Administration

Lyndon B. Johnson Space Center
White Sands Test Facility
P.O. Box 20
Las Cruces, NM 88004-0020



December 17, 2014

DEC 18 2014

Reply to Attn of:

RE-14-137

Hazardous **NMED**

Mr. John E. Kieling, Chief
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

Subject: NASA-Initiated Interim Measures at SWMUs 29-31

The NASA WSTF Hazardous Waste Permit, issued by NMED in November 2009, includes specific requirements for the development and submittal of Investigation Work Plans (IWP) for existing solid waste management units (SWMU) at the White Sands Test Facility. IWPs for SWMU 29 (Small Arms Range at STGT), SWMU 30 (200 Area Small Arms Range), and SWMU 31 (WB-2 Small Arms Firing Range) are scheduled for submittal to NMED by December 30, 2014 according to Permit Attachment 16.

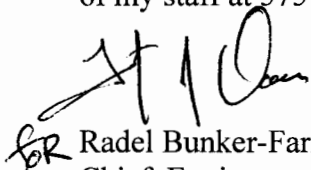
NASA initiated development of the IWP and Permit-required Historical Information Summary (HIS; Permit Section VII.H.1.c) for SWMUs 29-31 in September 2014. While developing the combined IWP for these units, NASA determined that it would be more appropriate to implement interim measures at these SWMUs as indicated in Permit Section VII.G.3. Based on preliminary field surveys and historical research performed to develop the HIS, ammunition scraps and fragments are present at all three locations. While these scraps/fragments do not present an elevated risk to human health or the environment at this time, NASA believes that available resources should initially be applied to removal and recycling operations. Therefore, NASA proposes the development and submittal of an Interim Measures Work Plan (IMWP) for SWMUs 29-31 rather than the standard IWP required by the Permit.

Additional time is required to complete the development of an interim measures strategy and to prepare the IMWP using information obtained during development of the HIS and IWP for these units. To complete this work with the limited resources typically available during the ongoing holiday season, NASA proposes to submit the IMWP and HIS for SWMUs 29-31 by January 30, 2015 and hereby requests that NMED accept the IMWP in lieu of the IWPs specified in Permit Attachment 16.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and

belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for known violations.

If you have any questions or comments concerning this submittal, please contact Tim Davis of my staff at 575-524-5024.



for Radel Bunker-Farrar
Chief, Environmental Office

cc:
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