

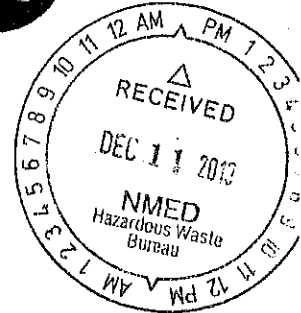
National Aeronautics and
Space Administration

Lyndon B. Johnson Space Center
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P.O. Box 20
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December 6, 2019

Reply to Attn of: RE-19-182



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

Subject: Request for Second Extension of Time for Well Reconfiguration Work Plan

On March 29, 2016, NMED approved NASA's January 27, 2016 *NASA WSTF Periodic Monitoring Report – Fourth Quarter 2015* with a comment expressing uncertainty about the source of detections of NDMA in groundwater monitoring wells BLM-30, PL-6, PL-7, PL-8, PL-10, ST-5, and WW-3 during 2015. In response, NASA provided an evaluation of NDMA results from the identified wells and requested an extension of time for submittal of the NMED-required reconfiguration work plan for the wells. On October 4, 2017, NMED approved NASA's submittal with modifications, extending the due date for submittal of the work plan to December 31, 2018. In the April 25, 2018 *Request for Extension of Time for NASA WSTF Monitoring Well Groundwater Data Representativeness Work Plan*, NASA recommended immediate 1,4-dioxane sampling at several wells with Water FLUTE systems with subsequent analysis using SW-846 Method 8270D with selective ion monitoring to more effectively quantify concentrations of 1,4-dioxane in Water FLUTE wells. NASA also requested additional time in which to prepare and submit the required work plan for evaluating data representativeness. NMED approved the request on May 15, 2018, and the due date for the data evaluation work plan was extended to December 31, 2018, consistent with the well reconfiguration work plan.

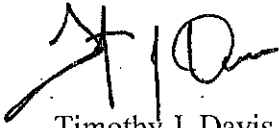
Chemical analytical data from sampling for semi-volatile organic compounds and 1,4-dioxane indicate a possible correlation between the Water FLUTE sampling system and detections of several compounds, leading NASA to conclude that the contamination may be originating from the Water FLUTE sampling system. To further evaluate this, NASA submitted the *Abbreviated Investigation Work Plan for Groundwater Data Representativeness, Phase 1: FLUTE Well Evaluation* on December 21, 2018, received NMED Approval with Modifications on May 13, 2019, responded to the Approval on July 30, 2019, and performed the required fieldwork in 2019. Based on the need to perform this investigation, NASA submitted the *Request for Extension of Time for Well Reconfiguration Work Plan* (for wells PL-6, PL-7, PL-8, PL-10, ST-5, and WW-3) on December 20, 2018. NMED approved the request on January 10, 2019, extending the date for submittal of the reconfiguration work plan to December 31, 2019.

The evaluation of data representativeness required by the December 21, 2018 work plan is ongoing. The investigation report is due to NMED by February 28, 2020. NASA believes that

all data should be thoroughly evaluated, reported to NMED, and reviewed by the Hazardous Waste Bureau as part of the stepwise process to determine the next phase in the data representativeness evaluation and well reconfiguration project. NASA continues to believe that it would be premature to reconfigure monitoring wells that currently provide chemical analytical data that adequately support the WSTF groundwater monitoring and remediation programs. Further evaluation of groundwater and sampling system data from WSTF groundwater monitoring wells is required to support the selection of an appropriate replacement sampling system. Therefore, NASA requests a further extension of time for submittal of the well reconfiguration work plan for wells PL-6, PL-7, PL-8, PL-10, ST-5, and WW-3 from the current due date of December 31, 2019 to December 31, 2020.

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 knowing violations.

If you have any questions or comments concerning this submittal, please contact Mike Zigmond at 575-524-5484.



Timothy J. Davis
Chief, Environmental Office

cc:

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