

State Government
State of New Mexico Environment Department



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PETER MAGGIORE
Secretary

FEB 1 1999

January 26, 1999

Dr. Andrew Vliet, Program Manager
McGregor Renewal
U.S. Army Air Defense Artillery Center and Fort Bliss
P.O. Box 6020
Fort Bliss, Texas 79906

Dear Dr. Vliet:

RE: MCGREGOR RANGE, NEW MEXICO LAND WITHDRAWAL RENEWAL DRAFT LEGISLATIVE ENVIRONMENTAL IMPACT STATEMENT; UNITED STATES ARMY, OCTOBER 1998.

This transmits New Mexico Environment Department (NMED) staff comments concerning the above-referenced Draft Legislative Environmental Impact Statement (DLEIS).

WATER QUALITY

Many activities described in this DLEIS meet the definition of industrial activity as defined by the U.S. Environmental Protection Agency (USEPA). USEPA requires National Pollutant Discharge Elimination System (NPDES) permit coverage for all storm water discharges associated with industrial activity from these sites. Among other things, this permit requires that a Storm Water Pollution Prevention Plan (SWPPP) be prepared for each site and that appropriate Best Management Practices (BMPs) be installed and maintained until all storm water discharges associated with industrial activity are eliminated, and the sites are finally stabilized by vegetation, or equivalent stabilization measures have been employed.

AIR QUALITY

The project is in an area that is currently in attainment for all National Ambient Air Quality Standards (NAAQS). During potential road upgrades and improvements, care should be taken to minimize dust emissions. Emissions during training activities are expected to be short term and spread over a large area. These emissions would largely come from mobile sources. The DLEIS determines that emissions would be widely dispersed and would not cause a significant impact.

77. To date, Fort Bliss has not identified any discharges into arroyo-riparian drainages, nor to unclassified tributaries, which might drain into playa lakes. Storm water Best Management Practices (BMPs) have been and continue to be implemented at all Fort Bliss facilities, including the ten Fort Bliss industrial facilities, which occur in New Mexico. These BMPs will preclude storm water impacts, and are described in the *Fort Bliss Storm Water Pollution Prevention Plan*. Fort Bliss continues to monitor storm water discharges from its industrial areas, and is pursuing the development and execution of various storm water-related projects. These actions demonstrate that Fort Bliss has resolved to comply with the Environmental Protection Agency (EPA) Storm Water regulations.

**State Government
State of New Mexico Environment Department**

Dr. Andrew Vliet
January 26, 1999
Page 2

78

Government military activities such as those described in the DLEIS are generally exempt from permitting requirements in the State of New Mexico, "to the extent that such activities: a. Do not result in visible emissions entering publicly accessible areas; and b. Are not subject to a NSPS or NESHAP" [20 NMAC 2.72.202.A.5]. NSPS is a New Source Performance Standard; NESHAP means National Emission Standards for Hazardous Air Pollutants. The Army should ascertain that these activities are indeed exempt from state permitting requirements.

HAZARDOUS/RADIOACTIVE MATERIALS

79

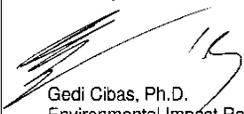
The Department's Hazardous and Radioactive Material Bureau (HRMB) currently regulates the disposal and environmental remediation of five (5) locals within McGregor Range. They include the following:

1. McGregor "Rubble Pit" (Landfill No. 13)
2. McGregor Range Oxidation Pond
3. McGregor Camp Fire Training Area
4. McGregor Range former Drum Storage Area
5. McGregor Range Open Detonation unit
(Permitted for Hazardous Waste Treatment Disposal)

We should note that any alternative use of these properties will require coordination with the HRMB.

We appreciate the opportunity to review this document, please let us know if you have any questions on the above.

Sincerely,



Gedi Cibas, Ph.D.
Environmental Impact Review Coordinator

NMED File No. 1218ER

78. The text in Section 3.6.3 has been modified to point out the Army's on-going program to evaluate each activity for compliance with New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP).

79. The text has been revised to include a discussion of the New Mexico Environmental Department (NMED), Hazardous and Radioactive Material Bureau (HRMB) regulated sites and to note that any alternative use of these properties will require coordination with the HRMB.