

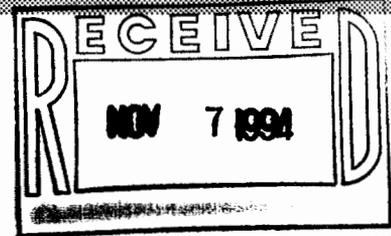
SIERRA CLUB

SOUTHERN NEW MEXICO GROUP

PO Box 3705 LPB Las Cruces, NM 88003

ENTERED

November 3, 1994



Barbara Hoditschek, Manager
NM Environmental Department
Hazardous and Radioactive Materials Bureau
525 Camino de Los Marquez Suite #4 P.O. Box 26110
Santa Fe, New Mexico 87502 Santa Fe, NM 87502

Re: Supplemental Comments Draft Permit OB/OD Unit U.S. Army
Ft. Bliss in New Mexico

Dear Barbara Hoditschek:

The Southern New Mexico Group of the Sierra Club herein presents Supplemental Comments to the Draft Permit for an OB/OD unit on U.S. Army Ft. Bliss in New Mexico.

There is at least one other OB/OD unit on Ft. Bliss in New Mexico. We respectfully requests that all OB/OD units be considered as part of this Permit process, because it is unclear what will be done at one and not the another. Because of the age and the amount of past use, we further request that these OB/OD units be required to cease and desist operation until a Decision is rendered on the Permits. Ft. Bliss is under the Training and Indoctrination Command (TRADOC). Our experience with Ft. Bliss and TRADOC is that, by the nature of its missions, live ordnance is used in practice, exercises, and training. Therefore it would be unreasonable to assume that any type of simulations have been or would be taking place at any OB/OD site on Ft. Bliss in New Mexico.

The list of ordnance provided with the Permit is all inclusive (a catalog) and not specific. We therefore believe the Application is not responsive. The State of New Mexico and the public need to know what is to be detonated and/or burned. No Permit should be granted with out specific detail of what ordnance and/or propellants the OB/OD units will be used for.

It is our understanding that the existing OB/OD units are unlined making them environmentally unsafe. To line old OB/OD units without first decontaminating them would not be rational. Therefore, these old sites should be slated for decontamination as soon as possible. This Draft Permit does not envision new lined OB/OD units therefore the Permit should be denied.

Contaminated water has been created at the existing sites. Individuals who have seen one of the sites observed grass growing in the bottom of the pit when there had been no rain in southern

New Mexico for a prolonged period of time. Therefore, one must believe there has been water in the pits. This water could come from seepage or from our localized severe thunder showers. An unlined OB/OD unit which can grow grass in its pits is a clear and present danger to public health, wildlife, and the environment. No open detonation or open burning should take place in any unlined unit. This permit should be denied.

No air quality monitoring data, specific to the area, is available. It is well known that El Paso, Texas, is not in compliance with air quality standards, particularly for particulate matter. The City of El Paso, Texas, is down wind from the OB/OD sites. Detonations into the air create large quantities of dust and pollutants and thus exasperbate existing air shed problems.

For the reasons stated in our original Comments and those stated herein, we respectfully request that this Permit be denied, and an order issued that the existing units be closed and decontaminated. Since recycling technologies exist for munitions, except perhaps 50 caliber bullets, Ft. Bliss should be encouraged to explore alternative technologies for the recycling of munitions. We understand that these technologies are specific to the type of ordnance involved. All the more reason that specific ordnance and propellants which would be destroyed at Ft. Bliss in New Mexico be known.

Since the OB/OD sites have not been through any NEPA process which involved the State of New Mexico and the public in decision making and a Base-wide Environmental Impact Statement (as required by law) does not exist, to the best of our knowledge, we reserve the right to submit future Comments as facts become known.

All government actions, past, present, and future must under the Federal Facilities Compliance Act go through the NEPA process to assess possible environmental impacts. The public has a right to know. If a NEPA process were initiated, all parties, including the State of New Mexico, could explore alternatives to open detonation and open burning and how they may be permitted by the State of New Mexico. We understand the need for disposal and decontamination, and wish that this be accomplished in the most environmentally sensitive way.

Sincerely,



Marianne H. Thaeler, Chair
Southern New Mexico Group
Sierra Club
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