

December 20, 1994

Mr. David Neleigh, Chief  
EPA Region 6H-PN  
Hazardous Waste Management Division  
RCRA Permits  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202

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Hazardous Waste Management  
Division  
RCRA Permits

Re: Comments to draft HSWA portion of the proposed RCRA permit  
for Fort Bliss Texas/New Mexico

Dear Mr. Neleigh:

McGregor Range, Fort Bliss in New Mexico is jointly managed with the Bureau of Land Management, Las Cruces District, Caballo Resource Area, Tim Murphy, Manager. The management is set forth in Public Law 99-606, a copy of which is attached. Portions of McGregor Range are managed for grazing, hunting, hiking, camping and wildlife watching. The withdrawal of these lands is set to expire in 2001.

There is an OB/OD unit on McGregor Range. Ft. Bliss has applied for a Permit from the State of New Mexico for this unit. We have vigorously opposed this Permit, believing that the OB/OD unit should be a RICA clean up site, as it is a potential threat to public health and safety.

Although this may not pertain, the OB/OD unit on McGregor has been in existence since 1965 according to the Draft State Permit for this OB/OD unit. This unit is unlined and unaproned, and is approx. 100 feet in diameter and approx. 30-40 feet deep. It has also been reported to us that "grass is growing in the bottom." Since it had not rained in southern New Mexico for 6 weeks when this observation was made, the grass had to get water from somewhere. Because of the age of this unit, and water does collect in the pits, again, we believe this OB/OD unit needs to be investigated.

There is also a missile launch site on McGregor Range which should also be investigated for hazardous materials and waste.

Recent conversations with Los Alamos National Laboratories (LANL) indicate that new technology exists, and is in use, which could be used for the clean up of the OB/OD unit. A contact person for this information is John Sanchez at 505-667-2012.

Because McGregor Range has areas of public access, we request that as much citizen participation in decision making be required in the EPA portion of this Permit. We respectfully request that the Southern New Mexico Group of the Sierra Club be put on any and all lists for public notification.

I, personally, am an officially designated Affected Interest on the grazing units on McGregor Range. I also request that my name be placed on any and all lists for public notification.

For these reasons we believe that the draft HSWA portion of the RCRA permit to be incomplete.

Thank you for the opportunity to present Comments.

Sincerely,

*Marianne H. Thaeler*

Marianne H. Thaeler, Chair, Southern New Mexico Group &  
Military Issues Chair, Rio Grande Chapter  
Sierra Club  
2015 Huntington Dr.  
Las Cruces, New Mexico 88011  
505-522-3421