



State of New Mexico
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GOVERNOR

PETER MAGGIORE
Secretary

October 5, 1998

Vicki Hamilton
 U.S. Army Air Defense
 Artillery Center and Fort Bliss
 Directorate of the Environment
 ATTN: ATZC-DOE-C(PEIS)
 Building 516B
 Pleasonton Road
 Fort Bliss, TX 79916-6812

Dear Ms. Hamilton:

RE: FORT BLISS MISSION AND MASTER PLAN: DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT; DEPARTMENT OF THE ARMY, HEADQUARTERS, U.S. ARMY AIR DEFENSE ARTILLERY CENTER AND FORT BLISS; AUGUST 1998

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

WATER QUALITY

1. Although the DPEIS contains a physiographic Features Map, we strongly recommend that it also include a topographical map, which would be significantly more useful to the Department's Surface Water Quality Bureau (SWQB) in evaluating the DPEIS with regard to impacts to surface water features such as watersheds, watercourses, and others.
2. It is not clear how proposed changes in the DPEIS will impact environmental restoration (ER) sites located on or near watercourses. SWQB has requested that Fort Bliss (FB) identify these sites but the information from FB has not yet been provided. This information is necessary to determine whether the activities described in the DPEIS would impact ER sites associated with watercourses and has not been considered in the DPEIS evaluation for impact to surface waters.
3. The erosional/stormwater controls stated in pages 3.2-20 through 3.2-22 should be addressed in a storm water pollution prevention plan before changes indicated in the DPEIS are made in the FB Mission. A Compliance Evaluation Inspection of FB for their National Pollutant Discharge Elimination System (NPDES) Permit #TXR05D076 in November of 1997 by Mr. Richard Powell of the SWQB resulted in an unsatisfactory rating for the inspection. The facility has not

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applied for the required NPDES permit coverage for New Mexico. The facility recently applied for multi-sector permit coverage and has terminated its NPDES baseline industrial permit coverage, but has not updated the required stormwater pollution prevention plan (SWPP). We request that the facility address the deficiencies stated in the November, 1997 inspection report before the proposed changes in the DPEIS are made.

4. The FB facility is contained within a watershed that recharges the Tularosa Basin, impacts wetlands, bolsons, etc. Statements are made in the DPEIS (pg. 5.1-30) referring to no or some potential impacts on arroyo-riparian drainages. However, it is not clearly defined in the DPEIS how any impacts will be repaired/prevented. This comment also applies to addressing industrial discharges to unclassified tributaries in the watershed which drain to playa lakes located in the Rio Tularosa Basin. A watershed management plan which incorporates input from all stakeholders using water from the watershed should be developed as part of the DPEIS commitment to Public input and Environmental Justice.

5. The DPEIS states that future activities on White Sands Missile Range (WSMR) and expanded operations at Holloman Air Force Base (HAFB) could contribute to cumulative impacts when combined with actions under various alternatives in the DPEIS, and that this could affect land use on FB. We recommend that all comments made previous to this one be considered when these alternatives are evaluated.

HAZARDOUS AND RADIOACTIVE MATERIALS

1. Section 4.12 (Hazardous Materials and Items of Special Concern) references FB's RCRA Subpart X, Open Detonation Treatment Permit but fails to mention the Permit's Hazardous and Solid Wastes Amendment (HSWA) module containing eleven (11) locations where solid wastes have possibly been released to the environment. FB should know that risk-based closure of these sites may have implications for the future land use of the site and any future property transfers.

2. The Department's Hazardous and Radioactive Material Bureau (HRMB) is currently working with all New Mexico Department of Defense (DoD) facilities, including FB, to determine how best to undergo risk-based corrective action. This process may involve the following activities or tracking mechanisms mentioned in the DPEIS:

- the Real Property Master Plan (RPMP),
- the Integrated Natural Resources Management Plan (INRMP),
- the Training Area Development Concept (TADC).

HRMB would like to discuss the above processes and mechanisms with FB's Directorate of Environment, as well as the land use categories listed on Table 2.5-1.

3. We recommend that in addition to the federal environmental statutes and regulations listed on Table 2.1-1, FB should list similar state requirements.

4. HRMB staff, and we are sure others, would have found it extremely useful to have had a tabulation of acronyms and their meaning while reviewing the DPEIS.

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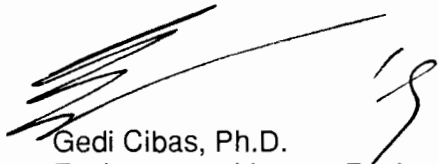
AIR QUALITY

1. FB is located in southern New Mexico, east of Las Cruces and extends into Texas east of El Paso. The New Mexico part of FB is in an area that is currently in attainment for all National Ambient Air Quality Standards (NAAQS). However, the new particulate matter (PM) standards should be carefully considered in future environmental assessments at the site, as areas nearby in Dona Ana County are currently in nonattainment for PM_{10} . Based upon the information provided for this DPEIS, however, we would not anticipate significant ambient air quality problems as a result of the basic mission of FB.

2. Another consideration for future environmental assessments is to use the U.S. Environmental Protection Agency (EPA)-approved air quality models in EPA-450/2-78-027R, *Guideline on Air Quality Models*. If there are no EPA-approved models that simulate aircraft activities effectively, it would be useful to provide the Department's Air Quality Bureau with model documentation to review before applying for a Title V permit.

We appreciate the opportunity to review this document. Please let us know if you have any questions.

Sincerely,



Gedi Cibas, Ph.D.
Environmental Impact Review Coordinator

NMED File No. 1197ER