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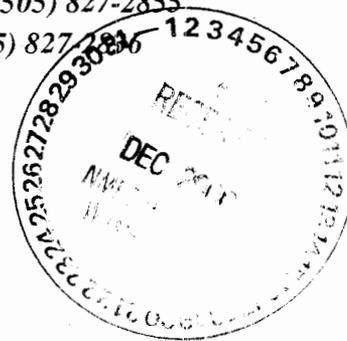
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December 4, 2006

John Barrera
NEPA Manager
Directorate of Environment
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Fax: 915.568.3548

Dear Mr. Barrera:

RE: DRAFT SUPPLEMENTAL PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT (DSEIS) FOR CHANGES TO THE FORT BLISS, TEXAS AND NEW MEXICO, MISSION AND MASTER PLAN (OCTOBER 2006)

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

Surface Water Quality

The U.S. Environmental Protection Agency (USEPA) requires National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) coverage for storm water discharges from construction projects (common plans of development) that will result in the disturbance (or re-disturbance) of one or more acres, including expansions, of total land area. According to the project information submitted, this project appears to involve several construction projects in New Mexico.

Among other things, this permit requires that a Storm Water Pollution Prevention Plan (SWPPP) be prepared for the site and that appropriate Best Management Practices (BMPs) be installed and maintained both during and after construction to prevent, to the extent practicable, pollutants (primarily sediment, oil & grease and construction materials from construction sites) in storm water runoff from entering waters of the U.S. This permit also requires that permanent stabilization measures (revegetation, paving, etc.), and permanent storm water management measures (storm water detention/retention structures, velocity dissipation devices, etc.) be implemented post construction to minimize, in the long term, pollutants in storm water runoff from entering these waters. In addition, permittees must ensure that there is no increase in sediment yield and flow velocity from the construction site (both during and after construction) compared to pre-construction, undisturbed conditions (see Subpart 9.C.1)

You should also be aware that EPA requires that all "operators" (see Appendix A) obtain NPDES permit coverage for construction projects. Generally, this means that at least two parties will require permit coverage. The owner/developer of this construction project who has operational control over project specifications (probably Ft. Bliss in this case), the general contractor who has day-to-day operational control of those activities at the site, which are necessary to ensure compliance with the storm water pollution plan and other permit conditions, and possibly other "operators" will require appropriate NPDES permit coverage for this project.

In addition, operation of many of the types of activities, existing and proposed, at this facility require Storm Water Multi-sector General Permit (see Federal Register/Vol. 65, No. 210/Monday, October 30, 2000) coverage. This permit also requires preparation of a SWPPP, and installation of appropriate storm water runoff control practices (per the SWPPP).

Fort Bliss has NPDES Storm Water Multi-sector General Permit coverage (NMR05B091) for various industrial activities at this facility. The permittee should amend the existing Storm Water Pollution Prevention Plan to incorporate any additional activities and pollutant controls dictated by this proposed action.

Ground Water Quality

The DSEIS describes potential environmental impacts and mitigation actions associated with land use and management decisions regarding installation assets, capabilities, and infrastructure to support current and future missions. Four alternatives were identified for analysis in the document: the no-action alternative plus three other alternatives that consider the implementation of various projects and new land use scenarios.

The analyses of the various alternatives considered impacts to ground water only from the perspective of effects on water quantity due to potential increases in ground water withdrawals for potable use. Although it is not anticipated that activities performed pursuant to any of the four alternatives would have a substantial likelihood of causing ground water contamination, the DSEIS should nonetheless address the potential for impacts to ground water quality, in addition to effects on ground water quantity.

The DSEIS notes that domestic wastewater generated at the Dona Ana Range-North Training Area and McGregor Range (both areas are located in New Mexico) is discharged to wastewater lagoon systems. It is likely that these discharges require Discharge Permits issued by the NMED-GWQB in accordance with the New Mexico Water Quality Control Commission Regulations. Fort Bliss is advised to submit a Notice of Intent to Discharge for each area, as required by 20.6.2.1201 NMAC, to the Ground Water Quality Bureau. NMED-GWQB will review the submittals and inform Fort Bliss if Discharge Permits are required for the domestic waste discharges.

The DSEIS indicates that hazardous wastes generated at Fort Bliss are regulated by TNRCC (now TCEQ) and NMED, depending upon the location of the specific area within Fort Bliss where the wastes are generated. Any changes in types or volumes of hazardous wastes resulting from implantation of any of the alternatives will continue to be addressed by the hazardous waste programs of TCEQ and NMED.

Implementation of new projects at Fort Bliss may involve the use of heavy equipment, thereby leading to the possibility of contaminant releases (e.g., fuel, hydraulic fluid, etc.) associated with equipment malfunctions. We advise all parties involved in the project to be aware of discharge notification requirements contained in Section 20.6.2.1203 NMAC. Compliance with the notification and response requirements will ensure the protection of ground water quality in the vicinity of the project.

Hazardous Waste

We want to stress a number of items in this section:

- The US Army's' Installation Hazardous Waste Management Plan and Standard Operation Procedures (SOPs) for handling and storage of hazardous waste must be adequate
- The United States Army (US Army) states in Section 5.12.6 that approximately 12,000 pounds per year of additional hazardous waste may be generated under proposed Alternative 4. If the US Army plans on storing hazardous waste in New Mexico for more than 90 days, then a Resource Conservation and Recovery Act (RCRA) permit would be required.
- When ordnance impacts on-site during training and testing exercises, the US Army is exempt from RCRA. However, if the US Army manages impact sites and contaminated soil, then the US Army's remediation and recovery efforts may be subject to RCRA Subtitle C and/or D. Management of contaminated media and newly created waste associated with training exercises and contaminated soil is potentially subject to RCRA.
- If ordnance impacts off-site during training and testing exercises, then the US Army is subject to the Military Munitions Rule (see Subpart M to 40 CFR 266). This scenario is not addressed in the DSEIS.
- If training activities impact on-site in an aquifer recharge zone in the Tularosa, Mesilla, Salt, and/or Hueco Basins, then the US Army may be subject to the New Mexico's Water Quality Control Commission (WQCC) and/or Drinking Water Regulations.

Air Quality

Fort Bliss is in part located in New Mexico's Doña Ana and Otero Counties, which are currently considered to be in attainment with New Mexico and National Ambient Air Quality Standards (NAAQS); however, the Department's Air Quality Bureau (AQB) has recorded exceedances of the standard for particulate matter (PM10) in Doña Ana County. In response to the recorded exceedances of the standard for PM10, a Natural Events Action Plan (NEAP) for Doña Ana County has been prepared and submitted to the U.S. Environmental Protection Agency for approval. As part of the NEAP, a dust control ordinance (Doña Ana County Ordinance No. 194-2000; Erosion Control Regulation) was adopted by Doña Ana County. To ensure air quality standards are met, applicable local or county regulations requiring noise and/or dust control must be followed; if none are in effect for as specific project area, controlling construction-related air quality impacts during

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projects should be considered to reduce the impact of fugitive dust and/or noise on community members. The NEAP for Doña Ana County, and County Ordinance 194-2000 if applicable, should be referenced in the final environmental impact statement.

Please be advised that older buildings may contain asbestos. Rehabilitation, renovation, or demolition of these buildings are regulated through the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61, Subpart M.

One of our concerns regarding rehabilitation, renovation, or demolition projects is that asbestos-containing material may be present and could be disturbed during the course of the project. If asbestos containing materials are disturbed without insuring that proper and safe procedures are used, then there is a risk of asbestos contamination to the environment as well as a risk of asbestos exposure by the public. If you have any questions concerning asbestos please call (505) 827-1494 and ask for Royce Wyrick or visit the New Mexico Environment Department website at <http://www.nmenv.state.nm.us/aqb/index.html> and click on the Asbestos link for more information.

Please note that an Environmental Assessment does not meet the requirements for a thorough asbestos inspection.

Compliance with New Mexico's smoke management regulation may be required for any prescribed burning activities that may take place. Emission reduction techniques for smoke should be developed and used. The use of at least one emission reduction technique is required for prescribed burns of more than 23 acres or 5000 cubic feet of pile volume per day. Additional requirements of the smoke management program include documentation on non-use of alternatives to fire, public notification, registration, and tracking. Information on all requirements is available on the Department's web site at http://www.nmenv.state.nm.us/aqb/SMP/smp_index.html.

Potential exists for temporary increases in dust and emissions from earthmoving, construction equipment, and other vehicles; however, the increases should not result in non-attainment of air quality standards. Dust control measures should be taken to minimize the release of particulates due to vehicular traffic and construction. Areas disturbed by the construction activities, within and adjacent to the project area should be reclaimed to avoid long-term problems with erosion and fugitive dust

All asphalt, concrete, quarrying, crushing and screening facilities contracted in conjunction with the proposed project must have current and proper air quality permits. For more information on air quality permitting and modeling requirements, please refer to 20.2.72 NMAC.

If a back up generator is used at the facility, be advised that records should be kept of the hours of operation of the generator. An application for construction permit must be submitted for standby generators used 500 hours per year or more.

There should not be any long-term significant impacts to ambient air quality from activities as proposed in the DSEIS.

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

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Sincerely,

Ron Curry
Secretary

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