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MARK E. WEIDLER
SECRETARY

July 15, 1997

Sheryl Parker
Headquarters Air Combat Command/CEVA
129 Andrews Street
Langley AFB, VA 23665-2769



Dear Ms. Parker:

RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR PROPOSED EXPANSION OF GERMAN AIR FORCE OPERATIONS AT HOLLOMAN AFB, NEW MEXICO; UNITED STATES AIR FORCE; JUNE 1997

The following transmits New Mexico Environment Department (NMED) staff comments concerning the above-referenced Draft Environmental Impact Statement (DEIS).

WATER QUALITY

All construction, operational activities and testing of equipment by the United States Air Force or the German Air Force must comply with the 1) "State of New Mexico Standards for Interstate and Intrastate Streams." and 2) "New Mexico Water Quality Control Commission Regulations." Particularly applicable sections of the Standards to be noted are Sections 1102, 2801, and 3101. Exceedance of surface water standards would be in violation of the New Mexico Water Quality Act (NMSA 1978, Sections 74-6-1 et seq).

Owners/operators of construction projects of five acres or more are required to apply for, at a minimum, permit coverage under the National Pollutant Discharge Elimination System (NPDES) baseline general storm water permit for construction activities. This permit coverage may be obtained by filing a Notice of Intent (NOI) no later than forty-eight hours prior to commencing construction activities. Among other things, this permit requires that a site-specific, Storm Water Pollution Prevention Plan (SWPPP) be prepared before submission of the NOI and that appropriate pollution prevention measures be installed at the site, in a timely manner. Best Management Practices (BMPs) are measures or practices used to reduce the amount of pollution entering surface or ground waters, which must be developed and implemented for each five acres or larger construction site. Information on the development of BMPs may be acquired from the New Mexico State University/Cooperative Extension Service, the U.S. Department of Agriculture/Soil Conservation Service and the U.S. Environmental Protection Agency's (USEPA) document entitled

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"Storm Water Management For Construction Activities". Information regarding this document and copies of the baseline general permit (which includes the NOI form) may be obtained by calling USEPA at (202) 260-7786.

The following discusses specific activities listed in the DEIS which could cause potential impairment to surface water quality during ephemeral flows:

1. Page 4-93 of the DEIS states that approximately 36 acres would be disturbed at Holloman Air Force Base (HAFB) during the period of construction. Excavation activities could create large areas of unconsolidated soils and could be the source of accelerated rates of fine sediment transport during summer rain storms. The increased volumes of fine sediment would collect in the stormwater drainage system and be carried down stream to Lake Holloman. Best management practices (BMPs) should be implemented at all construction sites to minimize erosion and impairments to surface waters. If properly written, implemented and monitored, the SWPP mentioned above should address this issue.

2. Page 4-93 also mentions that the proposed actions would increase the volume of hazardous material stored and used at HAFB. These activities could increase the potential contamination of the local surface waters. Guidance and standard operating procedures established to prevent hazardous materials from entering surface waters must be strictly followed. Any spills that may occur must follow the response and reporting procedure required in the New Mexico Water Quality Control Commission Regulations.

3. Page 4-94 states that the proposed actions at Red Rio Live Drop Target (LDT) would increase the delivery of live munitions from the current level of 500 units to 2,000 units in FY00. This activity would lead to increased soil disruptions and subsequently increase the potential for soil erosion during summer rain storms. BMPs should be implemented at this test site to minimize the potential of erosion and sediment transport into surface waters.

4. Page 4-95 mentions that the increased usage at Red Rio LDT would result in an accumulation of uncombusted explosive materials that could potentially be transported off site. Precipitation in this area is low, and the only potential period for transport would be during summer rain storms. Proper BMPs must be implemented to stop residual levels of TNT from entering surface waters. The introduction of TNT or other explosive materials could result in an exceedance of the Toxic Substances Water Quality Standards (Section 1102.F).

5. Page 4-96 states that construction at the McGregor Range will disturb 5,120 acres for the New Target Complex (NTC) and an additional 80 acres for access roads. All of these construction activities must follow the NPDES baseline general storm water permit for construction operations.

In summary, the actions described in the DEIS are not expected to be associated with significant impacts to surface waters in New Mexico if all necessary BMPs are identified, implemented and monitored.

With respect to potential ground water impacts, we should note that the current discharge plan for the wastewater treatment plant at the Base is permitted for 1.5 million gallons per day, which can accommodate the additional discharge anticipated with this project without requiring modification of the permit.

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AIR QUALITY

HAFB submitted an air quality permit application to the Department's Air Quality Bureau, in accordance with the Clean Air Act and New Mexico Administrative Code, on December 18, 1995. The permit application was ruled complete on March 11, 1997 and is currently under review by the Air Quality Bureau. The permit application self-designates HAFB as a major source for criteria and hazardous air pollutants.

The project location is in an area classified as attainment-- wherein air quality meets or exceeds the National Ambient Air Quality Standards (NAAQS). The Multiple Aircraft Instantaneous Line Source dispersion model was used to estimate air pollutant concentrations from sorties by Tornado and other aircraft in the areas of greatest potential activities that would be conducted under the proposed action. Portions of adjacent Doña Ana county are classified as marginal nonattainment for ozone and moderate nonattainment for PM₁₀. The nonattainment areas are restricted to the southern border region of the county (i.e., south of the airspaces potentially affected by the proposed action). Therefore, the proposed action would not encompass the nonattainment segment of the county.

There will be a temporary increase in air emissions due to ground disturbing activities, combustion products from the tree-clearing and grading equipment, and vehicle emissions from worker travel to and from the site. Implementation of control measures in accordance with standard construction practices will minimize these effects on air quality.

If the facility decides that there is a need to add other stationary sources, new source review permits may be required and the impacts on Title V compliance would be evaluated.

As long as the contractors supplying the aggregate and asphalt for any projects on base have current air quality permits, we find no deficiencies or inaccuracies in the information provided which would prevent an adequate environmental assessment of this project.

HAZARDOUS WASTE

We should note that section 4.8 Hazardous Materials and Waste Management of the DEIS is not sufficiently specific when addressing the amount of hazardous waste and type of waste streams expected to be increased by the project; in particular:

- a. If there is a new "waste stream" added then a permit modification and a revision of Part A may be required under 20 NMAC 4.1 Subpart IX at § 270.42.B.
- b. If the expansion causes an increase in waste storage greater than 25% a permit modification will be required under 20 NMAC 4.1 Subpart IX § 270.42.F.

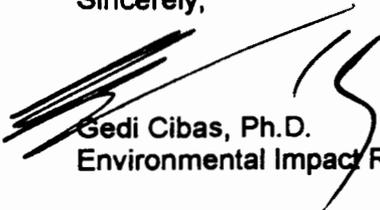
The first year that HAFB exceeds the estimated annual quantity of any waste stream caused by the expansion, a letter may be filed to address the overage. If HAFB expects to exceed the annual quantity again in subsequent years then a revised Part A Application must be prepared and filed with NMED. If Part A is incorporated into the Resource Conservation and Recovery Act (RCRA) Permit for HAFB, a Permit Modification will be required under 20 NMAC 4.1 Subpart IX § 270.42.

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During the active life of a training range it is exempt from RCRA until such time "waste" is managed. For example if the Unexploded Ordnance (UXO) is left in place or "treated in place", also called "blown in place", RCRA would not take effect. If the waste or UXO is collected and moved to another location it would be considered management and the area of collection then would fall under RCRA jurisdiction.

We appreciate the opportunity to comment on the DEIS; please let us know if you have any questions on the above.

Sincerely,



Gedi Cibas, Ph.D.
Environmental Impact Review Coordinator

NMED File No. 1104ER