

~~HAFBOS~~

Bearzi / File

State of New Mexico

ENVIRONMENT DEPARTMENT

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May 5, 2005

49 FW/PA
Attn: Boles Perimeter Security
490 1st Street
Room 280
Holloman AFB
New Mexico 88330-8287

Dear Sirs:

RE: HOLLOWAN AFB BOLES WELL FIELD PERIMETER SECURITY PROJECT, PUBLIC DRAFT ENVIRONMENTAL ASSESSMENT

This transmits New Mexico Environment Department (NMED) staff comments concerning the above-referenced Draft Environmental Assessment (DEA).

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. Because this project appears to exceed one acre (including staging areas, etc.), it may require appropriate NPDES permit coverage prior to beginning construction (small, one - five acre, construction projects may be able to qualify for a waiver in lieu of permit coverage - see Appendix D).

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 49 CES/CEV Holloman AFB HQ ACC/CEVP 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.

The CGP was re-issued effective July 1, 2003 (see **Federal Register/Vol. 68, No. 126/Tuesday, July 1, 2003** pg. 39087). The CGP, Notice of Intent (NOI), Fact Sheet, and Federal Register notice can be downloaded at: <http://cfpub.epa.gov/npdes/stormwater/cgp.cfm>

Ground Water Quality

The proposed project will involve the construction of approximately 33,000 linear feet of chain link fence around the Boles Well Field to achieve compliance with Public Law 107-188, Public Health Security and Bioterrorism Preparedness and Response Act of 2002. This project is unlikely to have any adverse affect on ground water quality.

Section 4.2.2.1 of the draft DEA correctly notes that any spills of fuel or machinery lubricants during construction of the fence must be cleaned up and disposed of properly in accordance with state regulations. The proper citation for the relevant regulations is 20.6.2 NMAC, New Mexico Water Quality Control Commission Regulations. The Department's Ground Water Quality Bureau (GWQB) advises all parties involved in the project to also 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

In the context of the DEA, the NMED concern is the potential for an encounter with previously dumped, abandoned, or discarded containers/receptacles of hazardous waste at the project area.

Should Holloman Air Force Base (HAFB) discover any hazardous waste containers, HAFB must report its findings to NMED orally within 24 hours from the time HAFB becomes aware of the circumstances. This shall be followed by a written report that includes the following:

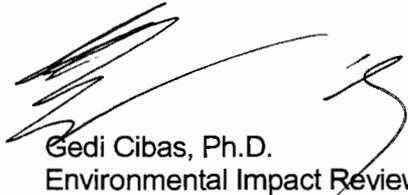
- Information concerning the release and the amount of any hazardous waste that may cause an endangerment to public drinking water supplies; and
- Any information of a release or discharge of hazardous waste or hazardous waste constituents, which could threaten the environment or human health outside the project area, as required by the New Mexico Hazardous Waste Management Regulations 20.4.1.900 NMAC, incorporating 40 CFR §270.30(1)(6)(i).

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Pursuant to 42 U.S.C. § 6924(u) and (v), NMSA 1978, § 74-4-4.2.B and 20.4.1.500 NMAC, incorporating 40 CFR Part §264.101, HAFB shall implement corrective action for any findings of hazardous waste and/or hazardous waste constituents found at the proposed project site as necessary, to protect human health and the environment.

We appreciate the opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gedi Cibas', is written over the typed name and title.

Gedi Cibas, Ph.D.
Environmental Impact Review Coordinator

NMED File No. 2079ER