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October 14, 1993

Roger C. Hartung (6W-E)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Dear Mr. Hartung:

Thank you for the opportunity to comment on the Region 6 FY-94 Multi-Media Enforcement Strategy. The New Mexico Environment Department (NMED) believes it is important that the states have input into the inspection targeting process and development of a multi-media approach to grant negotiations. The increased focus toward improved communications with the states on multi-media activity is commendable. The NMED is also pleased to see that the FY-94 strategy will continue the U.S./Mexico Border Initiative. However, NMED is very interested in evaluating any special targeting criteria to be used in targeting facilities in the border region.

Concerning the Federal Facilities Multi-Media Enforcement Initiative, NMED believes that the NEIC/Region VI joint inspection with NMED at Los Alamos National Laboratory (LANL) in August 1993 qualifies as a type D multi-media inspection. Should Region 6 decide to perform another multi-media inspection at a federal facility in New Mexico in FY-94, whether it be a type C or D inspection, NMED recommends that it be conducted at one of the Air Force bases.

Regarding the Target Selection Plan component of multi-media inspection targeting, NMED is interested in why facilities in the Lower Mississippi River corridor are included in a select group while those in the U.S./Mexico border region are not included. This point seems particularly relevant when assessing the relative environmental justice of potential targets.



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The Region 6 FY-94 Multi-Media Enforcement Strategy states that after extensive review of available data, a Quality Action Team determined that there is no statistically significant difference in the time it takes to issue a multi-media enforcement action than a single media enforcement action. NMED would be interested in evaluating the data that was used to make this determination, as our limited experience has been that coordination of multi-media activities in both the inspection and enforcement aspects consumes a considerable amount of time and resources.

Thanks again for the opportunity to make the above comments. If you have any questions concerning our comments or need any additional information, please contact Mr. Coby Muckelroy at (505) 827-4308, or myself at 827-2850.

Sincerely,

Kathleen M. Sisneros
Director
Water and Waste Management Division

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