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Department of the Army
US Army Garrison White Sands
Environmental Division (Bldg. 163/DPW)
ATTN: Customer Support Branch
White Sands Missile Range, New Mexico 88002-5000

Submitted electronically to: USARMYGarrisonWSMREnvironmentalAssessments@army.mil

RE: Draft Environmental Assessment to evaluate impacts associated with the Dense Plasma Focus Simulator at White Sands Missile Range.

Respected Acting Chief Smith,

The New Mexico Environment Department (NMED) reviewed the Draft Environmental Assessment to evaluate impacts associated with the Dense Plasma Focus Simulator at White Sands Missile Range (WSMR). NMED offers the attached comments for WSMR's consideration to ensure compliance with applicable federal and NMED regulations and standards during the proposed renovation and retrofitting of existing structures.

Strong intergovernmental coordination is essential to ensure protection of human health and the environment. In the attachment, NMED offers a few areas of potential environmental impacts for you to evaluate.

Thank you for providing the opportunity to review the project materials. Please reach out to us with questions or concerns you may have. We ask you to send all questions and comment requests to env.review@env.nm.gov, it helps expedite a timely review of your request.

Sincerely,

Jonas Armstrong, Director
Office of Strategic Initiatives

Attachment (1)

Attachment

Introduction

The New Mexico Environment Department (NMED) reviewed the Draft Environmental Assessment (Draft EA) to evaluate impacts associated with the Dense Plasma Focus Simulator at White Sands Missile Range (WSMR). The purpose of the proposed action is to develop and provide a neutron radiation source for the Survivability, Vulnerability and Assessment Directorate. According to the Draft EA, this test environment is needed to enhance survivability testing of Department of Defense (DoD) mission-critical military systems which will support United States security interests and those of allied forces.

Comments

Air Quality

NMED supports the use of radiation sensors at the facility and the use of Best Management Practices to minimize dust during construction outside the facility. In Section 2.1.2 Site Operation Activities (page 4) and Section 4.1 Air Quality (page 9), the Draft EA emphasizes the use of a 24/7 negative air pressure, non-recirculating air ventilation system in the tritium lab, tritium detection sensors, and tritium alarm systems to protect personnel from transient airborne exposure. On page 8 of the Draft EA, Table 2 highlights the use of Best Management Practices for dust suppression during trenching for utilities, site preparation for the three 6 ft. x 6 ft. concrete pads, and fence installation around the facility.

Table 2 also indicates a backup generator will provide power to maintain the exhaust air systems, tritium system, and the DPS system in the event of power failure. Reportedly, the generator engine will be “certified by the engine manufacturer to conform to the latest NSPS emission standards, in accordance with” federal regulation. In addition, other portable generators may be used during the construction/installation phase. We recommend that the White Sands Air Permit Contact be consulted regarding this project and the use of additional generators.

On page 2 of the EA, Section 2.1.1, regarding the preferred alternative, indicates “asbestos abatement was recently conducted in a follow-up to a 2020 hazardous building materials survey.” Therefore, interior renovations should not encounter asbestos containing material, and an asbestos survey is not required prior to renovation work. However, any unexpected asbestos waste generated during this project must be properly handled. Asbestos waste is considered a special waste under NMED’s Solid Waste Rules, which require unique handling, transportation, and disposal requirements to assure protection of the environment and the public health, welfare, and safety.

Petroleum Storage Tanks

The proposed project does not contain any actions that will impact storage tank systems currently regulated under NMED’s relevant regulations (20.5 NMAC), but the request proposes the installation of an emergency generator. If the storage tank system for the generator is 1320 gallons and greater, then it is within NMED regulations and must meet installation requirements.

There are no facilities with active tank systems within ½ mile of the proposed site nor confirmed release sites that are active or directly associated with the outlined project area, only one confirmed release site with a “no further action” status within a ½ mile of the project area.

Release Name: HAWK Facility (Release ID: 2622; Facility ID: 31379), Facility Name is US Army LC 32 Building 20548 with an address of R5ET 225 511 QSE Black Hawk, White Sands Missile Range.

If an abandoned storage tank system or petroleum contaminated soil or water is discovered during construction, the Petroleum Storage Tank Bureau must be notified (20.5.118 NMAC, etc.). Contact the Leak of the Week here during business hours: https://www.env.nm.gov/petroleum_storage_tank/ (see box to the right, Report a Leak or Spill) or call 505-476-4397. During non-business hours, call 505-827-9329.

Facilities where NMED's petroleum storage tank database shows all petroleum storage tanks have been removed or closed and where the database does not show a release and facilities unknown to the Petroleum Storage Tank Bureau are not included in this comment.

Surface Water Quality

Construction activities may affect Surface Waters of the State as defined in 20.6.4.7 NMAC, which includes intermittent and ephemeral arroyos within the construction area and are subject to 20.6.4.97 and 20.6.4.98 NMAC. Thus, operations must ensure protection of all surface waters of the state at all times, including General Criteria at 20.6.4.13 NMAC, established to sustain and protect existing or attainable uses of surface waters of the State. Surface waters of the State shall be free of any water contaminant in such quantity and of such duration as may with reasonable to avoid the probability of injuring human health, animal or plant life or property, or unreasonably interfering with the public welfare or the use of property.

The Applicant is required to report all spills immediately to NMED as required by the New Mexico Water Quality Control Commission regulations (20.6.2.1203 NMAC). For non-emergencies during normal business hours, call 505-428-2500. For non-emergencies after hours, call 866-428-6535 or 505-428-6535 (voice mail, twenty-four hours a day). For emergencies only, call 505-827-9329 twenty-four hours a day (New Mexico Department of Public Safety).

In addition to the above regulatory standards, SWQB requires the following practices to avoid contamination and to protect surface and groundwater quality:

- Fuel, oil, hydraulic fluid, lubricants, and other petrochemicals must have a secondary containment system to prevent spills and should be stored outside of the flood-prone zone.
- Work should be performed, when practicable, in the dry season and postponed during wet and muddy conditions.
- Appropriate spill clean-up materials such as absorbent pads must be available on-site at all times during road construction, site preparations, drilling and reclamation to address potential spills.

General

Page 22 of the Draft EA incorrectly identifies the NMED's Environmental Impact Review Coordinator as Michaelene Kyrala. Please update the contact to Claudia Trueblood, Science Coordinator, Office of Strategic Initiatives, env.review@env.nm.gov.