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ATTN: Customer Support Branch  
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Submitted electronically to: [USARMYGarrisonWSMREnvironmentalAssessments@army.mil](mailto:USARMYGarrisonWSMREnvironmentalAssessments@army.mil)

RE: Draft Environmental Assessment Addressing Operations and Training Support Facilities and Activities at White Sands Missile Range, New Mexico

Dear Acting Chief Smith,

The New Mexico Environment Department (NMED) reviewed the Draft Environmental Assessment Addressing Operations and Training Support Facilities and Activities 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 construction and improvement of facilities and designation of existing training areas to support the operations of tenant and transient units.

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

Thank you for providing the opportunity to review the project materials. Please reach out to us with any further questions or concerns you may have. We ask that you send all comment requests to [env.review@env.nm.gov](mailto: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 related to Operations and Training Support Facilities and Activities at White Sands Missile Range (WSMR). WSMR is proposing to construct and improve facilities and designate existing training areas to support the operations of tenant and transient units.

### **Comments**

#### **Air Quality**

Proposed Projects 1, 2, and 3 involve land disturbance activities. On page 3-10 of the Draft EA, WSMR proposes using a variety of dust suppression techniques during construction and earth moving activities to reduce particulate matter emissions. Likewise, on page 3-11, WSMR proposes using a variety of practices to minimize the potential for airborne dust during training exercises. Even though military installations are exempt from 20.2.23.108.B.(4) NMAC, the Air Quality Bureau (AQB) supports the use of all Best Management Practices and dust suppression techniques during construction, land disturbance activities, and training exercises.

Proposed Project 4 involves the renovation of existing structures at the North Oscura Peak (NOP) bivouac area. The Draft EA noted "Demolition may be required if it is cost prohibitive to refurbish the existing facilities." Whether the existing structures at NOP bivouac area undergo renovation (alteration of a facility or facility components) or demolition (wrecking or taking out), an asbestos survey, conducted by a qualified professional, must be conducted to determine if regulated asbestos containing material (RACM) exists in the structure. The survey must demonstrate that all potential asbestos containing materials at the facility have been tested. The survey must be conducted within three years of the start of the asbestos removal. If asbestos is found, the certified inspector will determine if it must be removed prior to the renovation. AQB should be notified when the quantity of regulated asbestos containing material is greater than 260 linear feet (for pipes), 160 square feet for other facility components, or 35 cubic feet of 'off facility' components. However, if demolition will occur, notification is still required whether asbestos was found or not. At no time shall any asbestos containing material be crushed at the site.

In addition to the asbestos survey, WSMR needs to complete the Asbestos NESHAP (National Emission Standards for Hazardous Air Pollutants) Notification form ([https://www.env.nm.gov/forms/ Air Quality Bureau>Asbestos>Asbestos NESHAP form](https://www.env.nm.gov/forms/Air%20Quality%20Bureau%26gt;Asbestos%26gt;Asbestos%20NESHAP%20form)). Please scan and email ([asbestos.aqb@state.nm.us](mailto:asbestos.aqb@state.nm.us)) or fax (505-476-4375) the signed and dated forms to AQB. Alternately, forms can be mailed to the AQB at the address listed on the asbestos reporting form. Submit a copy of the asbestos survey with the Asbestos NESHAP Notification form. Both must be submitted to the AQB at least 10 working days before renovation begins. Please do not send duplicate copies of the notice to the Bureau.

Projects 1, 2, 3, and 4 could potentially disturb existing water and wastewater supply lines. As previously noted for Project 4, demolition (wrecking or taking out) of cement water and wastewater pipes for system maintenance or capacity expansion requires an asbestos survey be conducted to determine if regulated asbestos-containing material (RACM) exists in the system. The same steps for an asbestos survey and reporting, as outlined above, must be undertaken for any disturbance to existing water and wastewater lines.

## **Solid Waste**

Construction activities would result in temporary increases of solid waste. During the proposed work, materials need to be characterized and disposed of properly, including toxic and solid wastes. Asbestos-containing materials and lead-based paint contaminated debris should be disposed of at a U.S. Environmental Protection Agency approved landfill. Construction debris generated, to include asphalt and concrete waste, should be disposed of in coordination with Solid Waste Management.

## **Groundwater**

On page 1-1, the last paragraph states, “The Proposed Action includes the construction or improvement of barracks, shower and laundry facilities, a vehicle wash station, and a bivouac area.”

On page 2-2, the last paragraph states, “Project 3: Construct Vehicle Wash Rack East of Main Post. WSMR proposes to construct a vehicle wash rack, which would cover approximately 0.98 acres, east of the Main Post (see Appendix B for a detailed map of Main Post). The vehicle wash rack would fulfill the need for invasive species control analyzed in the Range-Wide EIS. The concrete vehicle wash rack would be designed to remove contaminants, oil, and medium to heavy loads of mud from vehicles as large as Heavy Expanded Mobility Tactical Trucks, which are 8-wheel drive, 10-short ton tactical trucks measuring 32.6 feet long with a wheelbase of 16 feet. The wash rack would also have a closed water collection system that reclaims the used water.”

Vehicle Wash is considered industrial wastewater that contains organic compounds and metals. No car washing operation should discharge wastewater and/or grit trap waste below the ground surface (e.g., to a leachfield) because of the risk of ground water contamination. There will also be sludge accumulation from grit traps. The WSMR must submit an application and apply for a Ground Water Quality Bureau Discharge Permit renewal and modification for the wastewater produced from the barracks, shower and laundry facilities, and vehicle wash station.

If a facility decides to dry out the sludge on property they own, they must satisfy conditions set by the Ground Water Quality Bureau to protect ground water quality in accordance with the New Mexico Water Quality Control Commission (WQCC) Ground and Surface Water Protection Regulations, 20.6.2 NMAC. The car wash facility should file a Notice of Intent (NOI) with the Ground Water Quality Bureau, which should describe how the sludge will be handled and dried. An onsite drying area would need to be bermed and lined with a synthetic liner at least 30 ml in thickness and covered with ½ foot of soil or sand to protect the liner. In addition, if the wastewater from the car wash is not recycled or discharged directly to a city sewer line, the car wash facility should contact the Ground Water Quality Bureau about wastewater disposal.

On page 3-40, the third paragraph states, “Sanitary Sewer and Wastewater System. There are multiple wastewater treatment facilities at WSMR, the main facility being on Main Post. Water quality is monitored and meets both NMED and USEPA [U.S. Environmental Protection Agency] standards (WSMR, PHE, and SAIC 2009).” According to NMED records, the Discharge Permit, DP-297 White Sands Missile Range – HELSTF, has been expired since November 23, 1998; DP-492 WSMR - HELSTF Technical Support Area has been expired since June 10, 2001; and DP-976 WSMR - Main Post WWTP has been expired since February 4, 2007. The WSMR must submit a Discharge Permit renewal application for each of these three discharge permits (DP-297, DP-492 and DP-976).

## **Surface Water Quality**

Operations must ensure protection of all Surface Waters of the State at all times in accordance with NMED regulations. The project identifies Salt Creek as being outside of the proposed project area. However, construction activities within the project area may affect Surface Waters of the State as defined by

regulation in 20.6.4.7 NMAC, including tributaries to Salt Creek that are intermittent and ephemeral arroyos and subject to 20.6.4.97 and 20.6.4.98 NMAC, respectively. Surface Waters of the State shall be free of any water contaminant in such quantity and of such duration as may be 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.

WSMR should use Best Management Practices (BMPs) to ensure no runoff containing aqueous film forming foam (AFFF) reaches the stream as defined in NMED regulations for intermittent and ephemeral streams. Emerging contaminants are defined in 20.6.4.7.E(2) NMAC as contaminants that may cause significant ecological or human health effects at low concentration. Some such emerging contaminants are per- and polyfluoroalkyl substances (PFAS), a known contaminant within AFFF used for Class B firefighting. WSMR should implement BMPs to mitigate AFFF fluids spread to Surface Waters of the State and ensure any leaks or releases are contained.

WSMR 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 (NM Dept 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.
- 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.

### **Petroleum Storage Tanks**

If an abandoned storage tank system or petroleum impacted soil and/or water is discovered during construction, the Petroleum Storage Tank Bureau must be notified (20.5.118 NMAC, etc.). In the event that an abandoned storage tank system or petroleum impacted soil and/or water is discovered during any construction activity, please notify the Petroleum Storage Tank Bureau during business hours via the “Leak of the Week” at: [https://www.env.nm.gov/petroleum\\_storage\\_tank/](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, please call 505-827-9329. Owners, operators, and others dealing with petroleum storage tank systems must comply with all regulations in 20.5 NMAC, New Mexico’s Petroleum Storage Tank regulations.