



DEPARTMENT OF THE ARMY

UNITED STATES ARMY TEST AND EVALUATION COMMAND  
PARK CENTER IV 4501 FORD AVENUE  
ALEXANDRIA, VIRGINIA 22302-1458

65 FR 39206  
June 23, 2000  
(145)

21 SEP 00

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MEMORANDUM FOR Mr. David L. Meyer, Chief, Rules and Directives Branch, Division of  
Freedom of Information and Publication Services, Office of  
Administration, Mailstop T-6D-59, U.S. Nuclear Regulatory  
Commission, Washington, DC 20555-0001

72-22

SUBJECT: Comments, Draft Environmental Impact Statement, NUREG-1714

1. Reference: Draft Environmental Impact Statement (DEIS), Construction and Operation of an Independent Spent Fuel Storage Installation on the Reservation of the Skull Valley Band of the Goshute Indians and the Related Transportation Facility in Tooele County, Utah, NUREG-1714, June 2000.
2. The purpose of this memorandum is to provide U.S. Army Test and Evaluation Command (ATEC) comments on the referenced DEIS. Dugway Proving Ground (DPG) is an ATEC installation in Utah located about 9 miles from the Goshute Indian Reservation. The DPG is one of several installations that falls under control of the Developmental Test Command (DTC), an ATEC subordinate command.
3. The subject DEIS does not reference any Department of Army sources of information concerning Department of Army activities in the area of the selected site. The enclosed comments serve to correct certain statements found in Appendix F of referenced DEIS regarding DPG. As written, the statements misrepresent DPG, its capabilities and mission. Request attached corrections be made to subject document.
4. The ATEC point of contact for this action is Ms. Diane Hagler, (703) 681-6235, DSN 761-6235, or [haglerdiane@atec.army.mil](mailto:haglerdiane@atec.army.mil).

FOR THE COMMANDER:

 Col, GS  
BERNARD A. BARNES  
Colonel, GS  
Chief of Staff

Encl

CF:  
CSTE-CC  
CSTE-DTC-CS  
CSTE-DTC-DP

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## COMMENTS

## DRAFT ENVIRONMENTAL IMPACT STATEMENT,

"Construction and Operation of an Independent Spent Fuel Storage Installation on the Reservation of the Skull Valley Band of the Goshute Indians and the Related Transportation Facility in Tooele County, Utah", NUREG-1714, June 2000

1. Appendix F, Exhibit F.39, Executive Summary, Pg. F-41. Lead paragraph uses the term "nerve gas incinerator," which should be correctly referred to as a chemical warfare agent incinerator. Please revise this statement throughout the document.
2. Appendix F, Exhibit F.39, Pg. F-42 – F-43.
  - a. The sheep kill incident information presented in the document is incorrect. Recent documentation provided by the Skull Valley Band of Goshute Indians contradicts statements in this paragraph alleging present or past contamination. U.S. Army Corps of Engineer funding was provided to the Skull Valley Band of Goshute Indians for characterization sampling conducted by an independent contractor hired by the Skull Valley Band for this site. Test sampling found no contamination by chemical warfare agent or chemical agent breakdown products in this area.
  - b. The last sentence page F-42 states "...operations at Dugway Proving Ground have been reduced somewhat with the encouragement of the State of Utah..." Please be advised that the testing (of chemical and biological defense systems) mission conducted by U.S. Army DPG (through its West Desert Test Center) has increased substantially over the last 12-18 months, and is projected to continue to increase over the next several years. The State of Utah's Department of Environmental Quality works very closely with DPG's Directorate of Environmental Programs to ensure environmental compliance and permitting efforts meet all Federal and State requirements for all environmental media on the installation. The State of Utah has been very supportive of DPG's mission to serve the nation. Over the last several years, however, Federal funding to support DPG's base operations (e.g., housing, maintenance, facility upgrades, community services, etc.) has declined, not keeping pace with the increase in workload at its West Desert Test Center.
  - c. DPG has not conducted outdoor testing of chemical or biological warfare agent since 1969. The attendant risk referred to in this paragraph is therefore very insignificant.
3. Appendix F, Exhibit F.39, Pg. F-44.
  - a. Lead paragraph. DPG does not operate a biological or chemical weapons laboratory. Only chemical and biological defense system testing is conducted at DPG.
  - b. DPG is not located immediately next to the Reservation as stated in this paragraph. Refer to EIS map Figure 1.1, Pg. 1-2 and to Pg. F-46, which states that Dugway is "nine miles south of the Reservation."
4. Appendix F, Exhibit F.39, Pg. F-15, IX, DEMOGRAPHY. Dugway is not a town nor open to free public access. DPG is a U.S. military installation. Housing at DPG is not available to the general public but only to military, government and contract employees of the U.S. Army specifically working on DPG.
5. Appendix F, Exhibit F.39, Pg. F-46, SOCIO-ECONOMIC CONSIDERATIONS.

ENCL

a. Residents of DPG are employees (i.e., military or civilian) of the U.S. Army or one of its contractors. It is likely that only a very limited number of residents would be available for employment at the Independent Spent Fuel Storage Installation.

b. Use of the facilities at DPG is limited to only those who reside or work on the installation.

c. Employees at DPG conduct chemical and biological defensive testing, not testing of chemical and biological weapons. It is an assumption that this work is "far more dangerous than [working with] spent nuclear fuel."