



**CERTIFIED MAIL - RETURN RECEIPT REQUIRED**

April 30, 2025

Brian Knight  
Environmental Division Chief  
US Army White Sands Missile Range  
100 Headquarters Ave Bldg. 102  
White Sands Missile Range, NM 88002

**RE: NOTICE OF VIOLATION AND RESOLUTION  
US ARMY WHITE SANDS MISSILE RANGE  
EPA ID# NM2750211235**

Dear Mr. Knight:

Beginning on October 21, 2024, the New Mexico Environment Department (“NMED”) conducted a hazardous waste Compliance Evaluation Inspection (“Inspection”) at the US Army White Sands Missile Range (“WSMR”), located at HWY 70E, White Sands Missile Range, New Mexico (“Facility”). WSMR is a missile testing range for the armed forces, conducting training, research and development related to missiles and related technologies. The primary waste stream is maintenance related wastes for heavy vehicles, machinery and paint related wastes for vehicles, machinery, and buildings. Other waste streams are largely related to research and development.

Based on observations and review of the information obtained, NMED has determined that WSMR is the following:

- a large quantity generator of hazardous waste,
- a transporter of hazardous waste;
- a hazardous waste transfer facility;
- a large quantity handler of universal wastes;
- a mixed waste generator; and
- a permitted hazardous waste treatment and storage facility.

Furthermore, NMED has determined that WSMR has violated the New Mexico Hazardous Waste Management Regulations (“HWMR”) 20.4.1 New Mexico Administrative Code (“NMAC”) as specified below.

NMED Inspectors observed the following violation:

1. Failure to demonstrate the length of time that universal waste has been accumulated from the date it becomes a waste or is received. Specifically, a universal waste aerosol can container at SAP 21790 was discovered with no accumulation start date. This is a violation of 20.4.1.1000 NMAC incorporating 40 CFR 273.15(c).

NMED has determined that the violation was corrected at the time of inspection; therefore, no further action is required.

This Notice of Violation is considered an informal enforcement response in accordance with NMED's Enforcement Response Protocol. Please be aware that failure to address the above violation and any future substantial deviations from regulatory requirements may result in WSMR being considered for an elevated enforcement action. Also, be aware that any corrective action taken during our Inspection, or in response to this letter, does not relieve WSMR of its obligation to comply with any and all other applicable laws and regulations.

Pursuant to the NMED Delegation Order dated November 26, 2024, the Cabinet Secretary has delegated the authority to issue Notices of Violation under the Hazardous Waste Act and HWMRs to the Bureau Chief of the Hazardous Waste Bureau. If you have any questions regarding this letter, please contact Peter J. Garcia Sr. of my staff at 505-490-5868 or by email at [PeterJ.GarciaSr@env.nm.gov](mailto:PeterJ.GarciaSr@env.nm.gov).

Sincerely,

JohnDavid Nance  
Chief, Hazardous Waste Bureau

JN:pg

cc: Aaron Coffman, CTAP Manager, NMED HWB  
Peter J. Garcia Sr., Supervisor, NMED HWB  
Neil Dolly, Supervisor, NMED HWB  
Tyre Jameson, NMED HWB  
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Neelam Dhawan, Permits Program Manager, NMED HWB  
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Michael Kesler, NMED District III Manager

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