



Assistant Secretary of the Army (Installations and Environment)



Sequencing Munitions Response Sites Army Policies and Procedures

Environment, Energy Security & Sustainability (E²S²) Symposium & Exhibition May 12, 2011

**Bryan M. Frey, P.E., OACSIM, on behalf of:
Mr. J.C. King
Office of the
Deputy Assistant Secretary of the Army
(Environment, Safety and Occupational Health)**

Report Documentation Page				Form Approved OMB No. 0704-0188	
Public reporting burden for the collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Washington Headquarters Services, Directorate for Information Operations and Reports, 1215 Jefferson Davis Highway, Suite 1204, Arlington VA 22202-4302. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to a penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number.					
1. REPORT DATE 12 MAY 2011		2. REPORT TYPE		3. DATES COVERED 00-00-2011 to 00-00-2011	
4. TITLE AND SUBTITLE Sequencing Munitions Response SitesArmy Policies and Procedures				5a. CONTRACT NUMBER	
				5b. GRANT NUMBER	
				5c. PROGRAM ELEMENT NUMBER	
6. AUTHOR(S)				5d. PROJECT NUMBER	
				5e. TASK NUMBER	
				5f. WORK UNIT NUMBER	
7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES) Assistant Secretary of the Army (Installations and Environment),600 Army Pentagon,Washington,DC,20310-0600				8. PERFORMING ORGANIZATION REPORT NUMBER	
9. SPONSORING/MONITORING AGENCY NAME(S) AND ADDRESS(ES)				10. SPONSOR/MONITOR'S ACRONYM(S)	
				11. SPONSOR/MONITOR'S REPORT NUMBER(S)	
12. DISTRIBUTION/AVAILABILITY STATEMENT Approved for public release; distribution unlimited					
13. SUPPLEMENTARY NOTES Presented at the NDIA Environment, Energy Security & Sustainability (E2S2) Symposium & Exhibition held 9-12 May 2011 in New Orleans, LA.					
14. ABSTRACT					
15. SUBJECT TERMS					
16. SECURITY CLASSIFICATION OF:			17. LIMITATION OF ABSTRACT Same as Report (SAR)	18. NUMBER OF PAGES 15	19a. NAME OF RESPONSIBLE PERSON
a. REPORT unclassified	b. ABSTRACT unclassified	c. THIS PAGE unclassified			



Topics

- Sequencing defined
- Scope of the Army's Program
- Overview of the Army's Policy for Sequencing Munitions Response Sites (MRS)
- Sequencing MRS based on relative priority
- Consideration of risk-plus factors
- Regulator and stakeholder involvement in the process
- Sequencing decision-making process
- Process for documenting sequencing decisions
- Sequencing Implementation Plans
- Status of sequencing at Army sites



Sequencing Defined

- Process outlined in the Munitions Response Site Prioritization Protocol (MRSPP)
- Prioritization and sequencing identified as separate and distinct steps
- Prioritization is “black and white”
- Sequencing allows for consideration of other factors of importance to regulators, stakeholders, and the Army



Scope of the Program

- The Army inventory includes MRS at:
 - Active installations
 - Base Realignment and Closure (BRAC) installations
 - Army National Guard (ARNG) installations
 - Formerly Used Defense Sites (FUDS)
- The ultimate goal of the Army's work at munitions response sites: address DoD contamination in a manner that is protective of human health and the environment.



Army MRS Sequencing Overview

- *Army Policy* currently being developed (expected release summer 2011).
- Policy describes procedures for:
 - Sequencing MRS for action based on relative priority
 - Consideration of other (risk-plus) factors
 - Involvement of regulators and stakeholders in the process
 - Documenting sequencing decisions
 - Developing program-specific MRS Sequencing Implementation Plans
- Policy expands upon three main concepts:
 - As a matter of policy, higher risk sites will be addressed first, but during sequencing, other (risk-plus) factors may be considered
 - Sequencing within each of the Army's restoration programs (Active, BRAC, ARNG, and FUDS) is independent of one another
 - Sequencing recommendations are based on a "bottom-up build" process



Sequencing Based on Relative Priority

- Based primarily on the MRS's relative priority as determined by application of the Munitions Response Site Prioritization Protocol (MRSP)
- Exceptions include, MRS:
 - With an alternative rating of "Evaluation Pending" will generally not be sequenced until the necessary degree of characterization is complete
 - At which a munitions response action (e.g., Time-Critical Removal Action) is ongoing will not be sequenced for additional actions until after the response is complete and the MRSP has been reapplied



Consideration of Risk-Plus Factors

- MRS sequencing primarily based on relative priorities.
- When considered, risk-plus factors will:
 - Be evaluated on an MRS-specific basis
 - Not change an MRS's relative priority

Risk-plus factors typically considered may include:

- Concerns expressed by regulators or stakeholders
- Cultural or social factors
- Economic factors
- Findings of health, safety, or ecological risk assessments
- Plans for development of the property in near term.
- A community's reuse requirements
- Protection of endangered species, critical habitat, the ecology and/or artifacts
- Specialized considerations of tribal trust lands
- Programmatic considerations
- Mission requirements
- Formal agreements with regulatory agencies
- Established program goals and/or initiatives
- Short-term and long-term ecological effects and environmental impacts



Risk Plus Factor Examples

Risk-Plus Factor	Example
Findings of Health, Safety, or Ecological Risk Assessments	Picatinny Arsenal – Number of nearby on-site workers increased by mining company's operations <u>Result – Sequenced ahead of MRS with higher relative priority</u>
Plans for Near-Term Property Development	Fort Ord – Army has been working to speed transfers, and community desired to redevelop this highly desired location <u>Result – Sequenced ahead of MRS with higher relative priority</u>
Community's Reuse Requirements	Savannah Army Depot – Requires high cost CWM response action, but little community interest in property reuse <u>Result – Sequenced after MRS with lower relative priority</u>
Programmatic Considerations (e.g., resource availability)	Former Lowery Bombing Range (FLBR) – Army and state agreement resulted in substantial annual funding <u>Result – Sequenced ahead of MRS with higher relative priority</u>



Regulator and Stakeholder Involvement

- DoD and Army policy is to ensure regulators and stakeholders are offered opportunities to participate early and throughout the sequencing process
- Formal involvement can occur during site-level (Technical Project Planning) meetings or at the Installation level (for Active/BRAC) or State level (for FUDS)
 - May occur during development of:
 - Installation Action Plan (IAP) for Active installations
 - BRAC Installation Action Plan (BIAP) for BRAC installations,
 - Statewide Management Action Plan (SMAP) or similar document for FUDS
 - Also may occur during local FUDS Forums or other routine meetings
- Notification is provided:
 - When the prioritization process begins
 - In the event Headquarters, Department of the Army (HQDA) or the Office of the Secretary of Defense (OSD) change a sequencing decision previously agreed upon in the Management Action Plan (MAP) equivalent (IAP, BIAP, or SMAP).



“Bottom-up” Build Process

Installations and US Army Corps of Engineers Districts (FUDS):

- Develop MRS-level sequencing recommendations based on MRS-specific technical issues, other factors, and regulatory and stakeholder input
- MRS-level sequencing recommendations reported through chain of command to the authority responsible for restoration activities

Program Execution Managers:

- US Army Environmental Command (USAEC) for active installations, HQDA Base Realignment and Closure Division (BRACD) for BRAC installations, ARNG Directorate for ARNG installations, and USACE for FUDS
- Develop sequencing recommendations for MRSs based on site level-input in the context of programmatic considerations.
- Provide justification for MRS sequenced according to risk-plus factors or when MRS sequencing is changed from what is reflected in the MAP equivalent.

HQDA:

- Review, validate, and approve all sequencing decisions through semi-annual management reviews and the Army's Program Management Plan (PMP) review process.



MRS Specific Implementation Plans

- A Sequencing Implementation Plan (SIP) will be developed annually for each program area (Active, BRAC, ARNG, FUDS)
- Incorporated into the Program Management Plan for each restoration program, beginning with FY12
- The SIPs will include:
 - Detail on the sequencing process, unique to the particular program
 - Methods for evaluating and considering risk-plus factors
 - Methods for meeting documentation and reporting requirements
 - Process for involving regulators and stakeholders
 - Data management and documentation procedures



Documentation Procedures

- Sequencing-specific documentation includes the:
 - Sequencing decision
 - Regulator and Stakeholder input considered
 - Risk-plus factors considered (if applicable)
 - Rationale for sequencing an MRS of a lower relative priority before one of a higher relative priority (if applicable)
 - Input from regulators and stakeholders that may influence the sequencing of an MRS
- The Program Execution Managers are responsible for maintaining the required documentation



Documentation Procedures

- Sequencing documentation will reside in a number of different locations throughout the Army's restoration program structure:
 - Administrative Record / Information Repository
 - MAP or equivalent (IAP, BIAP, SMAP)
 - Army environmental database of record
 - Army Environmental Database – Restoration (AEDB-R)
 - FUDS Management Information System (FUDSMIS)
 - Upon deployment, all Army environmental data will reside in the Headquarters Army Environmental System (HQAES)
 - Program Management Plans (PMPs)
 - OSD's Knowledge-Based Corporate Reporting System (KBCRS)



Status of Sequencing?

- From one end of the spectrum to the other!
 - Active installations completed Site Inspections (SIs) in 2010, aggressively moving into Remedial Investigations (RIs)
 - BRAC has been engaging in munitions response activities for many years; extensively utilizing risk-plus factors to meet community reuse requirements
 - FUDS to complete SIs by 2014; very little funding for RIs
 - ARNG just beginning SI program
- Sequencing will continue to vary among the Army's restoration programs, both in approach and progress
- HQDA continues to work to bring consistency across the Army inventory in an effort to achieve the ultimate goal of addressing DoD contamination and protecting health and the environment



Assistant Secretary of the Army (Installations and Environment)



Questions?