



U.S. ARMY

Munitions Response Site Prioritization Protocol Progress and Challenges at Army Installations and Formerly Used Defense Sites



**Headquarters, Department of the Army
OACSIM, Installation Services Directorate
Army Environmental Division**

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 MAY 2009		2. REPORT TYPE		3. DATES COVERED 00-00-2009 to 00-00-2009	
4. TITLE AND SUBTITLE Munitions Response Site Prioritization Protocol Progress and Challenges at Army Installations and Formerly Used Defense Sites				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) Office of Assistance Chief of Staff for Installation Management (OACSIM), Installation Services Directorate, Army Environmental Division, 600 Army Pentagon, Washington, DC, 20310				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 4-7 May 2009 in Denver, CO.					
14. ABSTRACT					
15. SUBJECT TERMS					
16. SECURITY CLASSIFICATION OF:			17. LIMITATION OF ABSTRACT Same as Report (SAR)	18. NUMBER OF PAGES 17	19a. NAME OF RESPONSIBLE PERSON
a. REPORT unclassified	b. ABSTRACT unclassified	c. THIS PAGE unclassified			



Topics

- Overview of Army Inventory**
- MRSPP Overview**
- Army QA Panel**
- QA Panel Results and Feedback**
- Army MRSPP Policy and Guidance**
- Path Forward**



Army Environmental Universe

- ❖ 13.8 million acres
 - ❖ 155 active installations
 - ❖ 10,500 active ranges
 - ❖ 950 closed, transferred or transferring ranges
 - ❖ 1,400 environmental restoration sites on active installations
 - ❖ 270 environmental restoration sites on Base Realignment and Closure (BRAC) installations
 - ❖ 2,800 Formerly Used Defense Sites (FUDS) with eligible environmental restoration projects
 - ❖ 72 Army National Guard sites





MRSPP Overview

- ❑ The Munitions Response Site Prioritization Protocol (MRSPP) was published as a final rule in the Federal Register on 5 October 2005
- ❑ Assesses defense sites where munitions and explosives of concern (MEC) remains from past DoD operations
 - Unexploded Ordnance (UXO)
 - Discarded Military Munitions (DMM)
 - Munitions Constituents (MC)
- ❑ Used to assign a relative priority to munitions response sites (MRSs) for sequencing of action
- ❑ Includes three evaluation modules, each focusing on a specific hazard:
 - Explosive Hazard Evaluation (EHE) Module
 - Chemical Warfare Materiel Evaluation (CHE) Module
 - Health Hazard Evaluation (HHE) Module



MRSPP Overview

- ❑ Each of the three modules receives a letter priority (A-G) or an “alternative rating”.
- ❑ Alternative ratings:
 - Evaluation Pending
 - No Longer Required
 - No Known or Suspected Hazard
- ❑ An overall MRS priority can be obtained if sufficient information is available to score one or more of the modules
- ❑ The highest single module score determines the overall MRS priority
- ❑ If all three modules receive an alternative rating, the overall MRS priority will be an alternative rating as well



MRSP: Army Responsibilities

- Apply the Protocol at all MRSs
- Establish a Quality Assurance (QA) Panel
- Develop sequencing decisions
- Document and report the prioritization and sequencing processes and decisions
- Ensure information provided by stakeholders is included in the MRS Administrative Record, Information Repository, or project file
- Review each MRS Priority or Alternative MRS Rating at least annually and reapply the Protocol as necessary to reflect new information
- Ensure stakeholders are offered opportunities as early as possible and throughout the process to participate in the application of the Protocol and sequencing decisions



MRSP Quality Assurance

- ❑ The purpose of quality assurance within the context of MRSP is to:
 - Ensure that the Protocol is applied consistently and correctly across all MRSs in the Army inventory
 - Ensure consistency in data collection methodologies, application of the Protocol, and use and reporting of Protocol data across the military components
 - Ensure that each MRS Priority appropriately reflects documented MRS conditions
 - Serve as an internal management and oversight function
 - Establish and preserve the accountability and credibility of Protocol application



Army QA Panel Function

□ General Information

- Consists of primary members from Army Secretariat and Army Staff, with participation by Army Environmental Command, Corps of Engineers, National Guard, and Army BRAC Division
- The QA panel does not include individuals involved in applying the Protocol to the MRS under review

□ Functions

- Reviews scoring packages and supporting documentation to ensure that reasonable logic was used in determining the score
- Ensures that relative priorities accurately reflect MRS conditions
- Ensures that equivalent relative priorities reflect similar MRS conditions throughout the Army inventory

□ If a revision is recommended that changes an MRS Priority, the QA Panel will:

- Develop a rationale for the change
- Allow stakeholders to comment on the rationale before the change is finalized



MRS Sequencing

- ❑ MRSs are sequenced against others for munitions response actions
- ❑ Based primarily on the MRS's relative priority
- ❑ In general, MRSs with higher relative risks are addressed first
- ❑ The Army may consider other factors (“risk-plus” factors)

Examples of Risk-Plus Factors

- | | |
|---|---|
| <ul style="list-style-type: none"> ▪ Concerns expressed by regulators or stakeholders ▪ Cultural and social factors ▪ Economic factors ▪ Findings of health, safety, or ecological risk assessments or evaluations based on MRS-specific data ▪ A community's reuse requirements at BRAC installations ▪ Specialized considerations of tribal trust lands ▪ Reasonably anticipated future land use | <ul style="list-style-type: none"> ▪ Implementation and execution considerations ▪ Mission-driven requirements ▪ The availability of appropriate technology ▪ Implementing standing commitments ▪ Established program goals and initiatives ▪ Short-term and long-term ecological effects and environmental impacts in general, including injuries to natural resources |
|---|---|

- ❑ Other factors influence sequencing only, not the scores/priorities
- ❑ Stakeholders given opportunity to participate



Early MRSP Implementation

- ❑ DoD developed the MRSP with input from the components, including the Army
- ❑ DoD's manual for the Protocol ("Primer") is less proscriptive by design to allow for differences among DoD components and programs
- ❑ Lack of specific direction from DoD initially resulted in "trial and error" approach to execution
- ❑ USAEC and USACE reacted by developing program-specific implementation guidance



MRSPQ QA Panel and User Feedback

- ❑ Need for More Detailed Scoring Instructions for the MRSPQ Tables
 - Instructions for completing Table A (site background table) to maintain consistency between programs.
 - Direction on which tables can be omitted when the first table in the EHE and/or CHE is "no known or suspected hazard".
 - Discussion of the type of "evidence" that is required for justifying selections.
 - Direction on how to properly score the cultural and ecological resources tables.
 - General guidance on what is expected to be present in the notes field on each table



MRSPQ QA Panel and User Feedback

- ❑ Special Considerations for the HHE Module
 - Direction needed on which HHE tables are to be completed if no sampling data is available
 - Additional explanation of terms critical to scoring the HHE: "attributable to the MRS", "established background concentration ranges", and "incidental nonmunitions-related contaminants"
 - Clarification on when more current data should be used instead of maximum historical MC concentrations
 - Additional detail on the decision to not to pre-screen contaminants for inclusion in the HHE contaminant hazard factor calculation based on site-specific screening values
 - Process for noting that "sampling was conducted, but no contaminants were found" on the HHE tables, when applicable



MRSPQ QA Panel and User Feedback

- ❑ Use of alternative ratings
 - Some question of the "hierarchy" of alternative ratings
 - Clarification needed on the use of the three alternative ratings in the context of the very specific definitions from the Protocol language
 - Often used term “No Further Action” (NFA) or “No DoD Action Indicated” (NDAI): how to fit into these categories?
- ❑ Information on how to correctly use the Appendix B-1 comparison values
- ❑ How/when to update previously completed MRSPQ scores to bring them up to date with the new Army policy and guidance
- ❑ Direction on addressing overlapping MRSs
- ❑ Upward reporting requirements for Time Critical Removal Actions (TCRAs)



Army MRSP Policy

- ❑ Issued by Army Secretariat on 9 February 2009
- ❑ Provides direction on the following:
 - Flagging or removing sites that were erroneously included in the inventory.
 - Scoring MRS that are in the middle of response actions.
 - How to deal with MRS where potentially responsible party (PRP) issues are involved (specific to FUDS).
 - Whether or not to score the HHE when the EHE and CHE indicate “No Known or Suspected Hazard”
 - How to score a small arms MRS, considering that small arms do not represent “a unique explosive hazard”?
 - The proper use of MRSP comparison values in the HHE for both munitions constituents and “incidental nonmunitions-related constituents”.



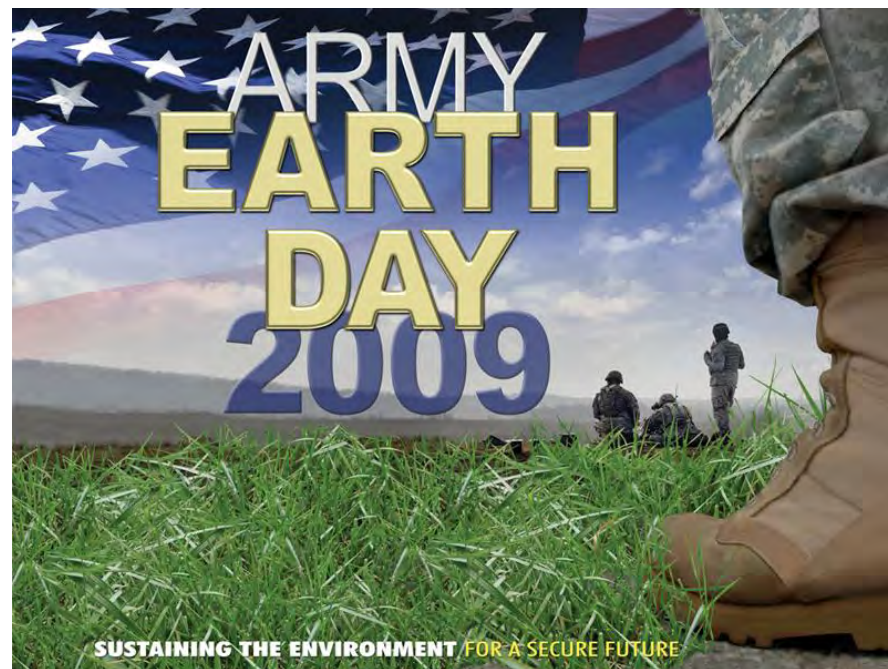
Path Forward

- ❑ Army Staff to develop comprehensive MRSPP Program Guidance
- ❑ Army organizations executing the Protocol to perform comprehensive QC check on previously completed MRSs
- ❑ Continued refinement of QA Panel Guidance and the Army's sequencing process
- ❑ Move forward with QA process and submission of Protocol data to Office of Secretary of Defense (OSD)
- ❑ OSD continuing development of an online training tool
- ❑ As required by the Protocol, MRSPP scores will be assessed annually



Army Environmental Mission

- ❑ Sustain the environment to enable the Army's mission now and provide for the future.
- ❑ Be an enabler for Army readiness for training, testing, and installation operations supporting the Soldier and Army mission with minimal restriction to operations.





Questions?

