Sequencing Munitions Response Sites
Army Policies and Procedures

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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 (MRSPP)

• 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 MRSPP 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

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## Risk Plus Factor Examples

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