

MEC HA Work Group Agenda & Meeting Minutes
MAY 2ND & 3RD 2006
Tyndall AFB, FL

MAY 2ND

- 0830 – 0900 Review Progress To Date, Agenda Revisions
- 0900 – 1030 Review Comment Responses to preliminary draft guidance, identify, discuss key issues.
- 1030 – 1045 Break
- 1045 – 1215 Review Comment Responses to preliminary draft guidance
- 1215 – 115 Lunch
- 115 – 245 Review Comment Responses to preliminary draft guidance
- 245 – 300 Break
- 300 – 500 Review Comment Responses to preliminary draft guidance
- 500 – 515 Recap & Adjourn

MAY 3RD

- 0830 – 0930 Revisit key issues, TWG recommendations
- 0930 – 0945 Break
- 0945 – 1045 Workbook revision presentation & discussion
- 1045 – 1130 Schedule of next steps
- 1130 – 1245 Lunch
- 100 – 115 Welcome remarks from LTC Chris McLane. USAF HQ AFCESA/CEXD
- 115 – 215 USAF EOD Presentation – Mr. Dave Brown, EOD Range Program Manager. Air Force Civil Engineer Support Agency.
- 215 – 230 Break
- 230 – 400 USAF EOD Flight Presentations

MEETING MINUTES

Attendees.

Dwight Hempel, DOI
Doug Maddox, USEPA
Doug Murray, Navy
Kevin Oates, USEPA
Jennifer Roberts, Alaska DEC
Dania Rodriguez, ASTSWMO
Bill Veith, USACE
Vic Wieszek, OSD
Laura Wrench, Versar

The meeting started with a review of progress to date on the MEC HA development. The recent review comment period and consolidation of comments review in Huntsville on March 28, 29, and 30, 2006 were discussed, as well as the basis for the draft general responses. The technical work group (TWG) agreed that with some additional editing the general responses would form a good basis for responding to commenting organizations. In addition to the general responses, face to face or teleconference meetings with commenting organizations would be offered along with discussions on specific comments and topics. The TWG agreed that Vic Wieszek and Kevin Oates should participate in all of these meetings with DoD organizations. Several specific topics that were received by the commenting organizations were discussed by the TWG. These are presented below. Laura Wrench presented a streamlined approach on the workbook. Laura will complete this approach and it will be sent to the TWG for review.

1.0. Comparative language in the text regarding the MEC HA and the MRSPP. Some reviewers and TWG members felt that the text in the draft guidance document does not need to “justify” and/or have extensive comparative language of how the MEC HA and MRSPP are different. The TWG recommendation is to simplify the language in the draft guidance. Place emphasis on what the MEC HA does in the CERCLA/MMRP process. The MRSPP and MEC HA can, and should, stand on their own as tools in the process.

2.0. Explosive Safety Plans (ESP) will have distance calculations for known MEC items on an MRS. These could be used in the MEC HA to establish the distance requirements for the Input Factor of Distance to Additional Receptors, as well as establishing whether Cultural, Ecological Resources & Critical Infrastructure need to be addressed in the CERCLA process (e.g. removal and/or remedial criteria analysis). This discussion concluded as a consensus item that the ESP and/or the Explosive Safety Submission (ESS) will contain information on the Explosive Safety Quantity Distance (ESQD) arc for the Munition with the Greatest Fragmentation Distance (MGFD) for the different operational areas on the site. These will typically be available at the RI level of site characterization where surface/subsurface MEC is known/suspected to be present and/or where intrusive investigations are planned. If intrusive operations are planned in the SI

phase, the MGFDF will be selected from the historical list of munitions known or suspected to be found on the site and the ESP will be prepared. It is expected that either the ESP or ESS will always have ESQD calculations as part of the planning for execution of a remedial investigation (or removal investigation) of sites with known or suspected MEC. Therefore, project teams will already have this information available for inclusion in the MEC HA process. The instructions in the draft MEC HA text on how to calculate MGFDF will be replaced with discussions that this information should be available to project teams either at the removal investigation and/or as part of the routine technical planning process prior to execution of an RI where MEC is known/suspected to be present. It will be essential that the lead agency for the site response activities consult the support agencies and stakeholders on the ESP/ESS process and provide copies of the approved ESP/ESS documents to the support agencies and stakeholders.

2.a. The TWG came to consensus that the MEC HA instructions in the next version should indicate that the MEC HA should not be applied until RI level data is available (this will typically be after the PA/SI and an approved ESP/ESS). Then the project teams should use the approved ESQD's from the ESP/ESS as discussed in item 2.0 above.

2.b. ESQD Definition. "Explosive safety quantity-distance (ESQD) arc means the prescribed minimum distance between sites handling, processing, storing or treating hazard Class 1 explosives material and specified exposures (i.e., inhabited buildings, public railways, other storage or handling facilities or ships, aircraft, etc.) to afford an acceptable degree of protection and safety to the specified exposure. The size of the ESQD arc is proportional to the Net Explosive Weight (NEW)."

3. The USAF recommends that the MEC HA methodology be implemented for 2 to 3 years and then be reviewed to evaluate its effectiveness. The TWG will recommend that after 2 to 3 years and/or 40 to 50 sites the MEC HA will be reviewed and evaluated by the sponsoring organizations to see if it is working as planned, and evaluate areas for improvements.

4. Make document more concise. The TWG reached consensus that the document can be substantially more concise. This will be one of the main goals of the ongoing re-write effort.

5. Be clear that there is significant backup information available at the MEC HA website. Several comments were received on background information and reviews that support the MEC HA TWG efforts. One of the common themes of these comments was that specific reviewers were not aware of the review instructions that included web links to supporting information. The response to comments will re-emphasize this information. The "Frequently Asked Questions" appendix will also emphasize these and other sources of information.

6. The TWG will begin to develop a series of focused fact sheets on specific topics, including frequently asked questions (FAQs). Topics for consideration include; Background Information on the MEC HA Website; Sources of Information; Project Team

consensus on MEC site-specific information; ESP/ESS/ESQD Process and information for the MEC HA; The relative weights of land use controls and removal/treatment of MEC, and how these different alternative are factored in the MEC HA; Community Involvement in the MEC HA. How the MEC HA supports alternative analysis, and hazard management decisions.

The following notes capture the general discussions on comments from organizations & individual personnel that were discussed by the TWG during the May 2006 working meetings.

DDESB Comments.

General # 1 regarding safety distances. Item 2 discussion above should answer the question.

General # 2. Mis-interpretation of MEC HA intrusive depth input factor. The comment appears to imply the MEC HA assumes a uniform depth for MEC below the surface, as well as depth for intrusive activities. This would be inconsistent with 6055.9 Chapter 12. These are not assumptions in the MEC HA. These will require consultation & clarification with DDESB commenters.

Specific Comments.

- Use of the term “detonate/detonation”. Need to be clear in terms/definitions etc. Recommend including a footnote that it includes “function” items, such as white phosphorous.
- Need to work on definitions of Maneuver Area and Burial Pit.
- Need to consider Small vs Large quantities of MEC in the “Amount of MEC” input factor.
- Maneuver Area. Areas used for conducting military exercises in a simulated conflict area or war zone. Definition discussion. Followup actions needed.
- Burial Pit. A location where MEC was buried without prior thermal treatment. [New definition for text] Followup action needed.
- Explosives-related industrial facility. Former munitions and explosives manufacturing, demil, maintenance or repair facilities. [new definition] Followup action needed.

US Army Comments

March notes on responses discussed by full TWG. Many are editorial and will be addressed in re-write of the document.

Dr. Crull comments.

Consider taking out MEC Size ? Would need to re-distribute 40 points, go to other factors. Consensus is to leave it as is in terms of scoring, but to better define in text. Be careful about how “portability” is discussed. Large is greater than or equal to 155mm round (~100lbs).

Comments # 17 – 29 are covered by discussion topic 2 above. Especially in the context of leaving calculation of ESQD in the hands of explosive safety experts, and then making those calculations available to project teams to support MEC HA evaluations.

Comment #30. MEC HA does not give “credit” for past cleanups. The MEC HA is not structured to look at MRS in a “retrospective manner”. That is, it is not structured to have a project team enter current, or projected conditions in Column One, then move to Column Two or Three of the Scoring Tables to “back calculate” the hazards that formerly existed at an MRS, versus the current conditions that exist. There is nothing to prevent a project team from conducting such an evaluation. However, the MEC HA has been developed and structured to express the current nature of the explosives safety hazards at an MRS, and to then to support the evaluation of removal/remedial alternatives under CERCLA. It is not appropriate under the MEC HA to evaluate current conditions where a previous surface clearance was undertaken by inputting the scoring values under column two – “Surface Clearance “. Recommendation: re-name Column 1 as baseline conditions – can be present or future use scenarios. The MEC HA meant to capture relative changes to site conditions based on alternatives.

Issue – where does Bulk Explosives fit ? Is it under Filler Type ? Should there be a change to Explosive Type ? Yes, this factor now includes both cased munitions and bulk. Need to be sure this is captured in text re-write/clarification.

Small arm disclaimer....MEC HA does not include these. Double check text to ensure this is covered in the discussions of the scope of the MEC HA.

Kevin Oates and Bill Veith to coordinate with Vic Wieszek on responses to Army/USACE. Will likely include discussions at Munitions Response Committee upcoming meetings, as well as Kevin Oates upcoming meetings in Huntsville. Will seek to undertake face to face with Jim Manthey and Dr. Michelle Crull on comments and TWG recommended changes based on comments.

Navy – Doug Murray of NOSSA will handle. Requests copy of margin notes from Huntsville and Tyndall meeting notes. Doug will develop draft responses on a line by line basis on the Navy comments from these working notes. He will coordinate with TWG members and will set up face to face and/or teleconference with Navy components to discuss responses to comments, changes to the MEC HA, and path forward/schedule and next step items.

Lenny Siegal/CPEO

One hand they are supportive, on the other, Lenny prefers a fundamentally different approach that is beyond what the TWG was tasked to do. Kevin Oates to follow up with Lenny Siegal/CPEO.

State Comments

Alaska – agree that all comments are addressed by draft General Responses.

California – TWG to provide a response to Jim Austreng on the request to include an analysis of LUCs as part of the MEC HA guidance document. Response and discussion will state this request is beyond the scope of the document.

Ohio – Missing appendices; LUCs analysis request outside of scope; community involvement fact sheet. ASTSWMO to follow up to determine if any action is needed beyond the General Response to comments.

Illinois: ASTSWMO to follow up to determine if any action is needed beyond the General Response to comments.

DOI Comments

General responses to comments should be sufficient at this level of document/guidance development.

Request to include instructions in the text to re-run of MEC HA/remedy effectiveness after major natural disaster

NAOC

Main topics include; Access; receptor interaction with MEC; and the approach for describing the MEC source(s). Reviewers recommended to re-order as accessibility, sensitivity, severity. The TWG discussed the option of rewriting the text organization along these lines. The TWG consensus was to leave organization as it is currently written. The recommendation by NAOc was viewed as reflective of differences of professional opinion that does not affect the outcome of the MEC HA. Kevin Oates will follow up with Dave Keller on NAOc comments and responses.

EPA Comments

Recommend more emphasis on community involvement in the text. Several other comments are duplicative of those received from other reviewers/organizations.

Follow ups.

Process for comment responses.

1. Finalize general responses & send out to commenting organizations through TWG members. Edits on the General Responses due to Kevin Oates by May 19, 2006.

2. More detailed & specific comment response consultation with commenting organizations.

For DoD, Kevin Oates & Vic Wieszek to attend all consultations.

Navy – coordinate with Doug Murray, he will coordinate with Navy commentors.

Army – coordinate with Bill Veith....include JC King, Dr. Crull, Jim Manthey others?

DDESB – Doug Maddox coordinate with Brent Knoblett. Bill Veith to attend as well.

USAF – Kevin Oates/Doug Maddox to coordinate with USAF HQ.

Vic, Doug, Doug, Bill, Dick need to send availability timeframes to Kevin to help set up DoD comment response consultations.

For States, Kevin Oates to attend via telecon with Jennifer Roberts & Dania Rodriguez, specific State reps from CA, OH, IL. Alaska comment responses accepted at TWG meeting.

For DOI; Dwight Hempel will send a note to reviewers on comment disposition and will include general responses. Many of the DOI comments were very specific editorial comments that will likely be addressed by the planned editing& streamlining of the draft guidance document. Decision on consultation by TWG with DOI is TBD based on Dwight's evaluations and feedback.

For NAOC; Kevin Oates to follow up on responses, including general responses.

For EPA, Kevin Oates & Doug Maddox to follow up.

Once finalized by TWG, the Meeting Minutes and General Responses will be posted on the MEC HA website.

Draft Schedule of upcoming events and activities:

May 12	Revised workbook to TWG
May 19	General response edits to KO
May 19 or 22	States consultation by teleconference
Weeks of May 22	
June 5	
June 19.....	DoD/DOI Consultations in Washington DC
June 16	Rewrite of guidance to TWG
July 11 – 13	Presentation at UXO Forum
July 21	TWG comments on re-write due
Week of Aug 7 th	TWG meeting. Location TBD
Aug 23	ASTSWMO brief in DC
Sept 1	Start public comment on draft guidance