



DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT SECRETARY
INSTALLATIONS AND ENVIRONMENT
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WASHINGTON DC 20310-0110

FEB 20 2009

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MEMORANDUM FOR

Assistant Chief of Staff for Installation Management, 600 Army Pentagon,
Room 3E474, Washington, DC 20310-0600
Commander, Installation Management Command, 2511 Jefferson Davis Hwy,
Arlington, VA 22202
Director, Military Programs Directorate, U.S. Army Corps of Engineers,
U.S. Army Corps of Engineers, 441 G. Street, NW, Washington, DC 20314-1000

SUBJECT: Army Policy for Application of the Military Munitions Response Site
Prioritization Protocol (MRSP) – Corrected Copy

1. Reference Department of Defense, Office of the Secretary, 32 Code Federal Regulations, Part 179, Munitions Response Site Prioritization Protocol (MRSP), 5 October 2005.
2. Purpose. This memorandum provides Army policy for:
 - a. The application of the MRSP to munitions response sites (MRS), including MRS executed under the Formerly Used Defense Sites (FUDS) Program for which the Army is assigned executive agent responsibility, (referred to as the Army's MRS Inventory).
 - b. Addressing sites that were erroneously listed on the Army's MRS Inventory (e.g., duplicate MRS).
3. As a result of the Army's Quality Assurance Panel's review of the Army's initial application of the MRSP, all Army Commands, offices and programs conducting environmental response actions under the Army's Military Munitions Response Program (MMRP) will apply the MRSP as directed below. Only the most current, complete, and reliable data will be used when applying the MRSP.
 - a. The MRSP will not normally be applied to those MRS where either a formal agreement has been reached with the appropriate regulatory authorities on sequencing the MRS for action or a munitions response (removal or remedial action) that is part of a time-critical removal action (TCRA) or a selected remedial action is ongoing. The MRSP will be applied to these MRS after the response action is complete or a remedy-in-place (RIP) has been achieved (see below). (Requests for exception to this policy will be submitted for approval to the Assistant Chief of Staff for Installation Management (ACSIM). If ACSIM approves an exception, the MRSP will be applied in accordance with ACSIM guidance.)

SUBJECT: Army Policy for Application of the Military Munitions Response Site Prioritization Protocol (MRSP)

(1) Pending completion of the removal or remedial action, the MRS will be assigned an alternative rating of "evaluation pending," with an annotation as to the reason for the alternative rating.

(2) Upon completion of a TCRA, the MRSP will be applied using regular procedures.

(3) When all response actions have been completed and a record of decision or a decision memorandum is issued, the MRSP will be applied using regular procedures, with an alternative rating of "no longer required" assigned, if appropriate.

b. When an MRS is on a FUDS and, consistent with DoD policy, there is a Potentially Responsible Party (PRP) project, the MRS will be assigned an alternate rating of "evaluation pending" until such time as a final determination concerning responsibility for the performance of the required munitions response is made, regardless of whether sufficient information exists to populate the three hazard modules.

(1) If it is established that another party will perform the required munitions response, no further action will be taken on the MRSP. In such cases, the MRS will be assigned an alternative rating of "no longer required," with an annotation as to the reason the Army will not conduct a response. A list of these sites will be maintained for future reference.

(2) If it is determined under the FUDS PRP process that the Army will perform the munitions response required at the MRS, the MRSP will be applied using the regular procedures.

c. If responsibility for the conduct of a munitions response has been formally transferred (e.g., transferred under an Environmental Services Cooperative Agreement) to another party (e.g., a local reuse authority), the MRS will be assigned the alternative rating of "no longer required," with an annotation as to the reason the Army will not conduct a response. The responsible agency will maintain a list of these for future reference.

d. The MRSP will be applied to all MRS in the Army's MRS Inventory with the exception of those MRS subject to paragraph 3.a, above. When applying the MRSP:

(1) If the Explosive Hazard Evaluation (EHE) Module's Table 1 (Munitions Type) is scored as zero ("evidence of no munitions"), only Tables 1 and 10 (Determining the EHE Rating from the EHE Module Score) will be completed. Table 10 will be assigned an alternative module rating of "no known or suspected explosive hazard."

SUBJECT: Army Policy for Application of the Military Munitions Response Site Prioritization Protocol (MRSP)

(2) If the Chemical Warfare Materiel (CWM) Hazard Evaluation (CHE) Module's Table 11 (CWM Configuration) is scored as zero ("evidence of no CWM"), only Tables 11 and 20 (Determining the CHE Rating from the CHE Module Score) will be completed. Table 20 will be assigned an alternative module rating of "no known or suspected CWM hazard."

(3) Small arms ammunition does not pose a unique explosive hazard. If it is confirmed, based on physical or historical evidence, that the only munitions-related activities that occurred at an MRS were ones that involved small arms ammunition, and the CHE receives an alternative module rating of "no known or suspected CWM hazard" or "no longer required," the MRS should not be considered to present an explosive hazard. The HHE should be completed, and the MRS should be sequenced for action based on the HHE rating.

(4) Evaluation of the HHE module will normally not be required for MRS where munitions constituents (MC) are not reasonably anticipated to be present, given the absence of explosives or chemical hazards. (The exceptions are small arms ranges (see 3d(3) above)). This should be the case where the EHE and CHE have ratings of "no known or suspected explosive [or chemical] hazard." In these circumstances, Table 28 will be assigned an alternative module rating of "no known or suspected munitions constituent (MC) hazard," regardless of whether or not incidental nonmunitions-related contaminants were found.

e. For those MRS for which:

(1) A "Right of Entry" (RoE) or other arrangement to access the property has not been obtained, only those hazard modules for which sufficient information exists to complete the module will be completed, with the remaining modules assigned an alternative module rating of "evaluation pending." The fact that a RoE could not be secured will be annotated on Table A, with the portions of the MRS for which a RoE could not be secured clearly indicated. The responsible agency will maintain a list of these for future reference.

(2) A ROE or other arrangement to access the property is refused by the party that owns or controls the property, the MRS will be assigned an alternative rating of "no longer required," with an annotation as to the reason the Army will not conduct a response. In such cases, the acreage of the MRS affected by the RoR will be adjusted, with an annotation made as to the reason for the adjustment. The responsible agency will maintain a list of these for future reference.

f. If it is determined that the site was erroneously listed as an MRS, Tables 10, 20, and 28 will be assigned alternative ratings of "no known or suspected [explosive, CWM or MC] hazard," respectively, and Table 29 will be assigned an alternative rating of "no

SUBJECT: Army Policy for Application of the Military Munitions Response Site Prioritization Protocol (MRSP)

known or suspected hazard." In addition, Table A will be annotated as to the reason. If the site requires additional evaluation for environmental contaminants resulting from DoD releases, the Relative Risk Site Evaluation (RRSE) process may be used.

g. The HHE Module's application must provide a national comparison of relative risk potentially posed by MC to human health and the environment. The DoD's Munitions Response Site Prioritization Protocol Primer (April 2007) (the Primer) comparison values (Appendix B) are established only for use for determining an MRS's relative priority. These comparison values are not intended for use instead of a baseline risk assessment or as a basis for establishing remediation goals for any munitions response that is eventually conducted at an MRS.

(1) The HHE Module will evaluate MC and may consider any incidental nonmunitions-related contaminants from DoD releases found to be present on the MRS exceeding concentrations for which the Primer's Appendix B provides a standardized risk-based comparison value. If the concentration of any MC or incidental nonmunitions-related contaminant does not exceed background levels, it will not be considered.

(2) Site-specific values will not be calculated nor will non-standard regulatory values be used because such values do not support a national comparison for prioritization of munitions response actions. (Note: The use of risk based values to screen for no action will comply with the National Contingency Plan (NCP) and DoD guidance.) (See MRSP Primer, page 91.)

h. Areas of Interest (AI). Locations for which there is only anecdotal information that the site may qualify as an MRS will be investigated to the degree required to determine whether they qualify for listing on the Army's MRS Inventory before being added to the inventory of MRS. Those AI that do not qualify as an MRS will not be scored and will be included on a list of AI sites for future reference.

4. My point of contact is Mr. J. C. King at 703.697.5564; or email: jc.king@us.army.mil.

Tad Davis

Addison D. Davis, IV
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(Environment, Safety and Occupational Health)

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