

I. Application of the Munitions Response Site Prioritization Protocol

A. General Requirements

There are a number of activities that the DoD Components must undertake as part of the application of the Protocol. Among other requirements, the DoD Components will:

- (1) Ensure the total acreage of each MRA is evaluated and apply the Protocol to all MRS under their administrative control.
- (2) Involve the local community in the munitions response process as early as possible and seek continued involvement of the local community throughout the process.
- (3) Use a team approach, where each team includes members with the expertise needed to apply the Protocol at a specific MRS. Each team should be comprised of DoD Component representatives from required functional areas (e.g., explosives or chemical safety, environmental) and EPA, State regulators, and other Federal land managers, where appropriate. The DoD Component is also expected to seek involvement from American Indian or Alaskan Native Tribes when any portion of the MRS affects tribal lands, the affected local restoration advisory board (RAB) or technical review committee (TRC), and local stakeholders in the application of the Protocol. DoD is committed to working with Tribes on a government-to-government basis in recognition of their sovereignty and in a continuing effort to implement the 1998 DoD American Indian and Alaska Native Policy. To ensure American Indian and Alaskan Native Tribes, EPA, other Federal agency, State regulatory agencies, and local government officials are aware of the opportunity to participate in the application of the Protocol, the DoD Component organization responsible for implementing a munitions response at the MRS will send a certified letter to the heads of these organizations (or their designated point-of-contact), as appropriate, seeking their involvement. A copy of these letters will be placed in the Administrative Record and Information Repository for the MRS.
- (4) Develop and maintain records on the application of this Protocol for each MRS. At a minimum, the records will contain references to all information and documents used for the evaluation (e.g., data from preliminary assessments, worksheets). These records will be included in the Administrative Record and the Information Repository for the MRS.
- (5) Document in a Management Action Plan (MAP) or its equivalent all

aspects of the munitions responses required at all MRS for which that MAP is applicable. DoD guidance requires that MAPs are developed and maintained at an installation (or FUDS property) level. For the FUDS program, a State-wide MAP may also be developed.

(6) Establish a quality assurance panel to review all MRS prioritization decisions. To ensure objectivity, this panel will not include any person that was directly involved with the application of the Protocol to a specific MRS. If the panel concludes that a different priority should be assigned to a given MRS, the DoD Component will report the rationale for this change to ODUSD(I&E) with their inventory data. The DoD Component will also provide this rationale to the appropriate regulators and stakeholders for review and comment before finalizing the change.

(7) Update the priority as necessary to reflect new information that has become available.

(8) Following the panel review, report the priority for each MRS and the ratings for each hazard evaluation module to ODUSD (I&E) (or successor organizations) for inclusion in the inventory of MRS that is made publicly available.

A. Application of the Protocol

Components will apply the Protocol at an MRS when there are sufficient data to populate all the data elements in at least one of the three hazard evaluation modules (i.e., the Explosive Hazard Evaluation, the CWM Hazard Evaluation, and Relative Risk Site Evaluation modules) that comprise the Protocol. It is expected that this will occur after the CERCLA preliminary assessment phase is completed but before the CERCLA site inspection phase is completed.

Any hazard evaluation module for which there is insufficient information to complete the evaluation will be assigned the "evaluation pending" rating for that module, and the MRS's relative priority will be assigned based on the ratings of the hazard evaluation modules for which sufficient data are available to complete the hazard evaluation. The Protocol will be reapplied as soon as the data to run the hazard evaluation modules assigned "evaluation pending" ratings becomes available.

The Protocol will be reapplied at a MRS under the following circumstances:

- (1) Upon completion of a response action that could change the site

conditions evaluated by the hazard evaluation modules at the MRS.

(2) To update or validate a previously rated hazard evaluation module when new information is available.

(3) To update or validate an MRS priority that was previously assigned based on evaluation of only one or two of the three hazard evaluation modules.

(4) Upon further delineation and characterization of an MRA into MRS.

(5) To categorize MRS previously classified as "evaluation pending."

When a munitions response is fully completed and no additional munition response is required, as agreed to by appropriate Federal and State regulatory agencies, the MRS will be assigned the rating "no longer required."

It is important to note that the Protocol is a prioritization tool only and does not impact the actions taken at an MRS. The responsible DoD Component will thoroughly investigate all MRS known or suspected to contain UXO, DMM, or MC and, as required by site-specific conditions, address any UXO, DMM, or MC through removal actions, remedial actions, or a combination or removal and remedial actions.

VII. The Hazard Evaluation Modules

The three modules that evaluate the potential hazards present at an MRS are the central feature of the Protocol. Using a hazard evaluation module developed specifically to address the unique characteristics of each type of hazard, DoD will evaluate each MRS in three distinct areas:

- Explosive hazards posed by UXO and DMM through the Explosives Hazard Evaluation (EHE) module,
- Chemical hazards associated with the physiological effects of CWM through the Chemical Warfare Materiel Hazard Evaluation (CHE) module, and
- Health and environmental hazards posed by MC using the Relative Risk Site Evaluation (RRSE) module.

Each hazard evaluation module is constructed using three categories, or factors, of information. As discussed earlier in the Preamble, this is a three-axis construct as three primary factors of information are used to derive the results of each hazard evaluation module. This characteristic is important as it limits the influence of any one factor on the outcome. Although the specifics of the three factors vary for each of the three hazard evaluation modules, each module is comprised of standard factors for source of hazard, pathways for exposure, and receptors. Further, each factor is comprised of multiple data elements that are intended to capture site-specific information. While developing the data elements, the