DERP Forum

Strengthening Relationships with our Regulatory Partners

St. Louis, Missouri May 8-9, 2019

Department of Defense Military Munitions Response Program

DERP Forum May 9, 2019

MMRP

- Military Munitions Response Program (MMRP)
- MMRP Challenges
- MMRP Tools
- Partnering with Stakeholders

MMRP

- DoD developed the MMRP inventory in 2001 (10 USC 2710)
- Addresses hazards from unexploded ordnance (UXO), discarded military munitions (DMM), or munitions constituents (MC)
 - Does not include operational ranges,
 operating storage or manufacturing facilities,
 or permitted facilities for the treatment or
 disposal of military munitions
- Published the Munitions Response Site
 Prioritization Protocol (MRSPP) (32 CFR 179)
 in 2005 which assigns munitions response sites
 (MRSs) a relative priority based on potential
 risk to human health and the environment
 - MRSs with a higher relative risk will usually be assessed first ("worst first")
 - Other factors (e.g., community interests) can influence sequencing decisions

MRSs as of FY 2018		
	Total MRS Inventory	Number of MRSs at Response Complete (RC) Through FY 2018
Active Installations	2,832	2,130
BRAC Locations	360	273

MMRP Challenges

EPA

- Inefficient use of time and resources digging harmless debris mistaken for munitions
- Limited technology available to reduce costs and accelerate cleanup
- Limited data to enhance regulator confidence in cleanup decisions and minimize the potential for residual risk
- Lack of communication and coordination on project scoping, data quality objectives, and conceptual site module

States

- Acute hazard creates a unique situation for determining future land use restrictions
- No promulgated regulatory standards or "safe" levels
- Variety of sites and munitions
- Regulator oversight challenges

DoD

MMRP Tools

Advanced Classification for MRSs

 Most reliable method of data analysis and classification for detecting subsurface objects that could be munitions; used during the remedial investigation/feasibility study cleanup phases

DoD Advanced Geophysical Classification Accreditation Program (DAGCAP)

 Uses two third-party accreditation bodies to demonstrate competency and document conformance to DAGCAP requirements; 12 contracting organizations are DAGCAP accredited

MMRP Risk Management Method (RMM)

 Uses data to support remedial action objectives (RAOs) and data quality objectives (DQOs)

• Quality Assurance Project Plans (QAPPs): Advanced Geophysical Classification and Munitions Response

 Facilitates up front planning; improves communication with regulators; builds confidence in tools; supports data quality, decision making, and regulatory buy-in

Partnering with Stakeholders

- Partnering with stakeholders and maximizing transparency, public participation, and collaboration is vital to ensure cost effective and efficient decisions about the MMRP
- Exchanging views and information, and working closely with federal and state regulators and other stakeholders to develop and refine the MMRP Tools
 - Munitions Response Dialogue (MRD)
 - Environmental Council of States (ECOS)
 - Interstate Technology & Regulatory Council (ITRC)
 - Association of State and Territorial Solid Waste Management Officials (ASTSWMO)
 - Environmental Data Quality Workgroup and Intergovernmental Data Quality Task Force (EDQW & IDQTF)
 - National Association of Ordnance Contractors (NAOC)