



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
US ARMY DEFENSE AMMUNITION CENTER
1 C TREE ROAD
MCALESTER OK 74501-9053

JMAC-EST

25 July 2013

MEMORANDUM FOR US Army Corps of Engineers, Environmental and Munitions Center of Expertise (IMRE-SO), P.O. Box 1600, Huntsville, AL 35807-4301

SUBJECT: Request for Policy Interpretation of Army Regulation DAP 385-64 Chapter 19, Improved Conventional Munitions (ICM) Clean-up Operations.

1. References:

- a. DA Pam 385-63, Range Safety.
- b. DA Pam 385-64, Ammunition and Explosives Safety Standards
- c. Department of Defense Explosives Safety Board (DDESB) Technical Paper (TP) 18, Minimum Qualifications for Unexploded Ordnance (UXO) Technicians and Personnel.

2. Reference 1.a provides range safety policy for the U.S. Army and the U.S. Marines and provides guidance for the application of risk management in range operations. Many times in providing safety or best practice the applications found in Range Safety policy can and should apply to Explosives Safety and vice versa.

3. Reference 1.b provides U.S. Army safety policy on ammunition and explosives, often referred to as military munitions. This Army explosives safety policy provides mandatory procedures and guidance as well as the preferred and acceptable methods of handling and storage of ammunition and explosives. The policy also covers recovery of munitions and explosives of concern (MEC) and recovered chemical warfare materials (RCWM) for final disposition.

4. Until 1968 it was Army policy, and acceptable world policy to discard military munitions by burial or by deep trenching sea disposal. As our nation has progressed many of the military fortifications changed mission and/or were determined to be excess property and were sold off or given to civic organizations with limited use. Many of these areas when disposed of were in extremely rural areas but modern civilization has encroached onto this property and the responsibility of removal and clean-up of these ammunition and explosives items are the responsibility of the United States Army as the single item manager for ammunition and explosives to remove and make these former used defense sites (FUDS) safe from the hazards of military munitions.

5. A number of these FUDS contain a MEC referred to as ICM. These ICM contain submunitions that are considered armed and sensitive to initiation. On active ranges where U.S. military train using these ICM references 1.a Section 2-11 restricts range clean-up and recovery of ICM because of the sensitive nature of these submunitions.

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6. While this same restriction is not explicitly mentioned in reference 1.b, Chapter 19, which deals with MEC and RCWM it is acceptable safe policy and prudent practice that the same restrictions would be applicable to any clean-up operation where ICM is suspected to have been used.

7. The Department of Defense Explosives Safety Board (DDESB) has set forth personnel standards that are applicable to contractor UXO personnel working for the DoD. The requirements of these UXO Personnel are found in reference 1.c. Because of the sensitive nature of ICM the contractor must comply with the standards as contained in DDESB TP 18 when dealing with MEC if working in an area known or suspected to contain ICM, all personnel must be UXO-qualified and the same policies as found in DAP 385-63 Range Safety, Section 2-11 is the best policy when dealing with ICM should apply where safety is consistent throughout the Army when dealing with ICM. If the need for other than UXO qualified personnel is necessary in ICM areas, equipment operators, geophysics team, survey team, etc., a DARAD will be completed per DA PAM 385-30 and a copy, with proper signature authority provided to this office through the chain of command and the appropriate contracting office.

8. The POC is Dr. Jimmy L. Langley, DSN 956-8767, Commercial (918) 420-8767, email jimmy.l.langley.civ@mail.mil.

KENYON L. WILLIAMS
Deputy Director
US Army Technical Center for Explosives Safety

CF: (w/encl)

Office of the Director of Army Safety, (DACS-SF/Mr. Patton), 223 23rd Street, Crystal Plaza 5, Suite 980, Arlington, VA 22202

Office of the Deputy Assistant Secretary of the Army for Environment, Safety, and Occupational Health, Special Assistant for Munitions, (DASA-DESOH/Mr. King), 110 Army Pentagon, Washington, DC 20310-0110

U.S. Army Corps of Engineers (CESO/Ms. Roberts), 20 Massachusetts Avenue, NW, Washington, DC 20314-I00