



Assistant Secretary of the Army (Installations and Environment)



Policy Update

Military Munitions Support Services (M2S2) Workshop

August 2014

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**Office of the Deputy Assistant Secretary of the Army
for Environment, Safety and Occupational Health**



Assistant Secretary of the Army (Installations and Environment)



Highlights

- **Material Potentially Presenting an Explosive Hazard (MPPEH)**
- **Environmental Protection Agency's Military Munitions Rule**
- **DDESB Technical Paper 18**



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Material Potentially Presenting an Explosive Hazard (MPPEH)



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DoDI 4140.62

➤ Change 1, 19 Feb 14

- Mostly administrative changes

- Key non-administrative changes:

- ✓ MPPEH management procedures *do not apply to subsurface material, subsurface material*

- ✓ Add an exclusion “MPPEH are munitions within the DoD-established munitions management system, *non-munitions related material (e.g., horseshoes, rebar, other solid objects), munitions related solid metal fragments that do not realistically present an explosive hazard*, and other items . . .



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DoDI 4140.62

- **Change 2 – in formal review under SD 106**
- **Allows DoD Components to establish for:**
 - ✓ **Determining when MDAS must be reprocessed as MPPEH; and**
 - ✓ **Application of expert knowledge**
- **Contains definitional changes and clarifications**
 - ✓ **Expended small arms cartridge casings**
 - ✓ **Management and disposition**
 - ✓ **MPPEH (inclusions and exclusions)**
 - ✓ **Qualified receiver**



Definitions

expended small arms cartridge casings. Cartridge cases from center-fired and rim-fired ammunition for use in rifles and weapons .50 caliber (12.7 millimeter) and smaller, shotguns, pistols, and revolvers. Usually brass metal; however, if steel, plastic, or a combination of both, they are usually grouped for policy with the brass cartridge cases, but are collected and disposed of separately. Also referred to as brass or fired cartridges.



Definitions

management and disposition of MPPEH, MDEH, and MDAS - For the purpose of this instruction and supplemental guidance, includes the identification; recovery; collection; inspection; determination of the material's explosives safety status; marking; storage, including segregating by the explosives safety status; security; demilitarization; and the transfer or release, including sale.

qualified receiver - DoD and commercial entities (i.e., activities, units, businesses) that have personnel who are trained and experienced in the safe handling of the MDEH they are authorized, licensed, or otherwise permitted to receive, manage, and disposition material and are capable of attaining a DoD-approved site plan



Definitions

MPPEH includes:

Material owned or controlled by the DoD that, prior to determination of its explosives safety status, potentially contains explosives or munitions (e.g., munitions containers and packaging material; munitions debris remaining after munitions use, demilitarization, or disposal; and range-related debris) or potentially contains a high enough concentration of explosives that the material presents an explosive hazard (e.g., equipment, drainage systems, holding tanks, piping, or ventilation ducts that were associated with munitions production, demilitarization, or disposal operations).



MPPEH does not include:

Military munitions and military munitions-related materials, including wholly inert components (e.g., fins, launch tubes, containers, packaging material), that are to be used or reused for their intended purpose and are within a DoD Component-established munitions management system.

Non-munitions-related material (e.g., horseshoes, rebar, other solid objects) and munitions debris that are solid metal fragments that do not realistically present an explosive hazard

Other items that may present explosion hazards (e.g., gasoline cans, compressed gas cylinders) that are not munitions and are not intended for use as munitions.



Change 2 (Cont)

indicates that the explosives safety status of MPPEH does not need to be determined before allowing qualified DoD contractors who are selected to perform range clearance activities or munitions responses. However, contracts for such activities or responses must require contractors to meet:

- ✓ Applicable DoD and DoD Component explosives safety criteria and implement the provisions of this instruction.**
- ✓ Contractual inclusions and requirements and other applicable regulations or standards.**



Change 2 (Cont)

- **Recognizes that personnel assigned to a technically qualified position or designated, in writing, by the commander as technically qualified**
- **Eliminates certain documentation requirements for:**
 - ✓ **DoD's activity or installations assigned a military munitions-related that is capable of managing and dispositioning safely the material (i.e., MDEH) it is to receive**
 - ✓ **A contractor awarded a contract that possesses the appropriate permits and licenses to manage and disposition MDEH**



Personnel Qualifications

- **DASA(ESOH) issued interim guidance on 2 Jul 14 personnel qualifications for documenting the explosives safety status of MPPEH**
- **Interim guidance include language from the DoDI in formal coordination addresses MPPEH by type and the qualifications and training required for each type**



MPPEH Next Steps

- **DoDI 4140.62 - Complete SD 106**
- **De-conflict DoDM 4160.21-M, Volume 4, Defense Demilitarization: Program Administration and DoDI 4140.62**
- **DoDM 4140.62 - Management of Material Potentially Presenting an Explosive Hazard (MPPEH) Procedures**
 - **Address changes made to DoDI 4140.62**
 - **Provide for SD 106 review**



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Environmental Protection Agency's Military Munitions Rule



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EPA Military Munitions Rule

- **Current policy is DoD Munitions Rule Implementing Policy (MRIP) dated 1 Jul 98, issued**
 - **Independently by DoD Component Environmental Secretaries**
 - **As interim guidance pending its issuance as a DoD issuance**
- **DoDM 4715.ab, DoD Military Munitions Rule (MR) Implementation Procedures**
 - **Drafted by joint Service, cross functional work group over several years, with extensive pre-Service coordination**
 - **Entered formal coordination (SD 106) May 2014**
 - **Comments, to date, non-substantial**
 - **Expect DoD issuance by Oct 2014**



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EPA Military Munitions Rule (Cont)

Changes

- **Primarily tweak Service-issued MRIP, addressing concerns experienced over approximately 15 years of application**
- **Clarifies:**
 - ✓ **How the EPA Munitions Rule will be applied**
 - ✓ **The Rule does apply directly to munitions responses**
 - ✓ **DDA's responsibilities**
 - ✓ **EOD Support to munitions and explosives emergencies**



Technical Paper (TP) - 18

- **DDESB TP 18 (20 Dec 04) provides minimum qualifications for unexploded ordnance (UXO) technicians and personnel**
- **Army-drafted and submitted a revision to DDESB Nov 13**
- **DDESB formed joint Service Work Group (WG) to revise TP-18 in Nov 13, first meetings Jun 14**
- **DDESB and WG agreed to use Army revision as basis for discussion**
- **To date, WG has reviewed three of four sections**



Technical Paper (TP) - 18

Army Proposal:

- **Re-titled TP-18 to Minimum Qualifications for Personnel Conducting Munitions and Explosives of Concern-Related Activities**
- **Defined such activities as including munitions responses to MEC, range clearance-related activities, and similar operations that involve the intentional physical contact with MEC or the conduct of ground-disturbing or other intrusive activities in areas known or suspected to contain MEC**
- **Clarified and added requirements for each category of personnel involved including MEC –Related support personnel, UXO-Qualified personnel, UXO-Technicians; dive personnel**



Technical Paper (TP) - 18

Army Proposal:

- Clarified TP-18 does not apply to:
 - ✓ DoD Explosives Ordnance Disposal (EOD) operations.
 - ✓ Personnel performing duties directly related to RDT&E and quality assurance testing.
 - ✓ Trained and experienced explosive workers involved in the decontamination or demolition of explosives-contaminated buildings or infrastructure
- Clarified the requirements of Table 4-1



Technical Paper (TP) - 18

- **Separated Table 4-1 into three tables:**
 - ✓ **Minimum Qualifications for UXO-Qualified Personnel**
 - ✓ **Minimum Qualifications for UXO-Technicians**
 - ✓ **Minimum Qualifications for Non-UXO Support Personnel and Non-UXO Sweep Personnel**

- **Next Steps**
 - ✓ **Complete joint Service review**
 - ✓ **Address comments – to date, limited, but some may require minor revisions**
 - ✓ **Finalize TP-18 for publication, after DDESB Voting Member review and approval**



3Rs Explosive Safety Education

- **An integral part of risk management is education**
- **Focus on preventing behaviors (touching, moving or disturbing) that may lead to injury**
- **Guiding principles:**
 - ✓ **All munitions are dangerous**
 - ✓ **Consistency of message is important**
 - ✓ **Message must be easy to remember and accessible to all ages**
 - ✓ **Speed information to affected communities**
 - ✓ **Standardize materials reduce time lag and level of effort**





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Questions (Not limited to Subjects Discussed)



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