

INTERIM RISK MANAGEMENT (IRM) M2S2 UPDATE

Brian Jordan

"The views, opinions and findings contained in this report are those of the authors(s) and should not be construed as an official Department of the Army position, policy or decision, unless so designated by other official documentation."



US Army Corps
of Engineers®



IRM at FUDS



US Army Corps
of Engineers®



U.S. ARMY

IRM Development

- Growing regulator concerns and land manager concerns about sites between initial investigation (SI) and remedy in place (RIP) or response complete (RC)
- Risk management white papers developed by SMRF and ASTSWMO
 - ▶ Notification of property owners and public officials
 - ▶ Community education and outreach about explosive safety
 - ▶ Particularly interested in implementation at sites no longer under DoD control



US Army Corps
of Engineers®



OSD Metric for FUDS IRM

- Office of the Under Secretary of Defense memo on MMRP Goal for Munitions Response Sites in DoD's FUDS Program, 7 Feb 2014

- ▶ Establishes metric for IRM at FUDS:

“Implement Interim Risk Management (IRM) or initiate a munitions response action, to include an investigation or a removal/remedial action, at FUDS munitions response sites (MRS) that have not yet reached response complete for 90% of the FUDS MRS inventory by the end of FY18.”



US Army Corps
of Engineers®



FUDS IRM Implementation

- **FUDS IRM Management Plan, January 2015**
- **Includes sites not in Current or Budget Year Workplan**
- **Activities to mitigate impacts to human health, safety, and the environment at a point in the CERCLA process after a known or suspected risk or hazard is identified but before a response action is conducted**
- **Generally between completion of the SI but prior to initiation of RI/FS**
 - Could be anytime there is not active work and response complete has not been reached
- **Primarily coordination, public notification, and public education**



US Army Corps
of Engineers®



Key IRM Concepts

- Covers MMRP projects
- HQUSACE managed program for sites not included in the CY/BY workplan.
- Conduct IRM at eligible sites at least once every 5 years
- Consistent messaging

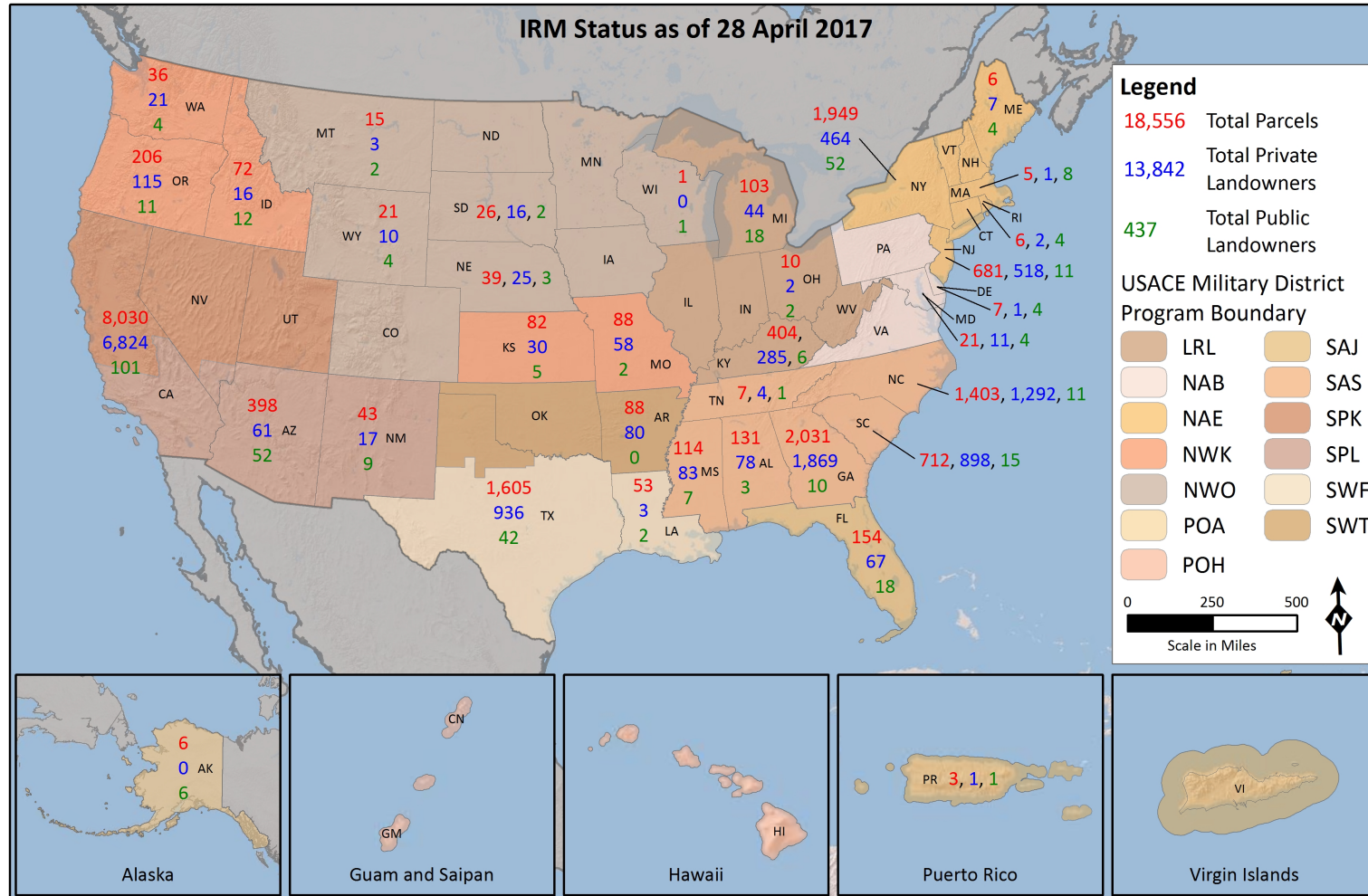


US Army Corps
of Engineers®

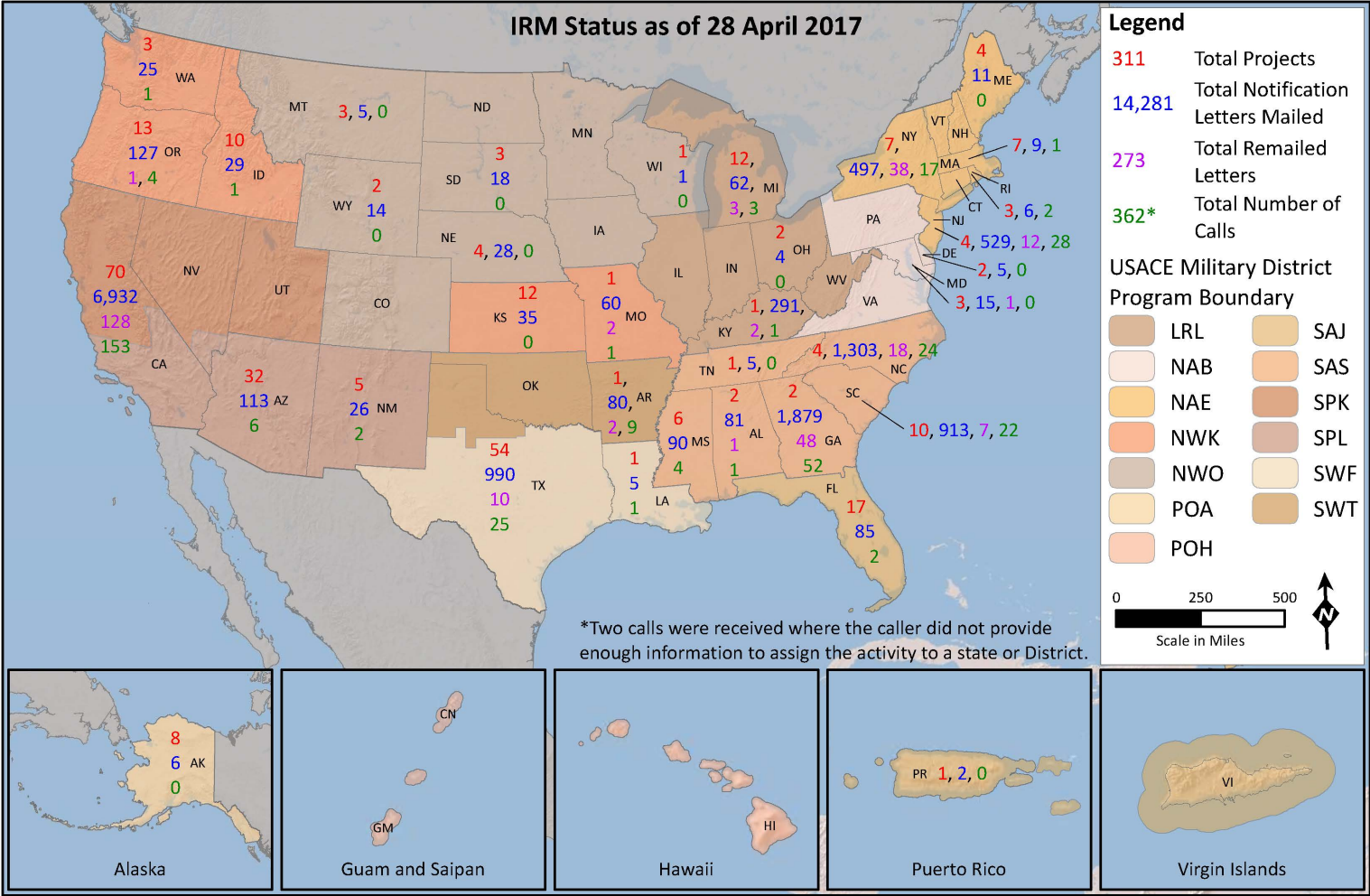


PROGRESS TO DATE

7



PROGRESS TO DATE (CONTINUED)



OVERALL RESULTS

	Deliverables			Landowner Letters			Information Center		
	CASs	SGs	Translated SGs	Ltrs Mailed	Delivered	Undeliverable	Calls	Referred Calls	Resolved Calls
Group 1 & 2/ Group 3 (In Progress) Totals	367	311	123	14,281	13,609	672	365	233	231



OVERALL RESULTS

Information Center	Number of Calls
Calls/Voicemails Received	365
Calls from Landowners	277
Calls from Government Officials	25
Calls from Media	2
Calls from Lawyers	9
Calls from Public	43
Calls from Tenants	6
Callers Referred to USACE	233
Calls Resolved by USACE	231
Calls not Related to IRM	3



GROUP 1 RESULTS

		Deliverables			Landowner Letters			Information Center		
	District	CASs	SGs	Translated SGs	Ltrs Mailed	Delivered	Undeliverable	Calls	Referred Calls	Resolved Calls
Rollout	SWF	10	6	3	340	332	8	2	0	0
	SWT	2	3	3	35	35	0	1	1	1
Group 1	NWK	15	10	4	112	111	1	3	1	1
	SWF	13	13	11	82	75	7	3	2	2
	SWT	7	7	4	24	24	0	0	0	0
	LRL	15	11	0	357	352	5	4	4	4
	POA	5	1	0	3	3	0	0	0	0
	SAJ	3	3	1	7	6	1	0	0	0
	SAS	12	11	1	2,617	2,429	188	74	56	55
	NAB	1	1	0	12	11	1	0	0	0
	NAE	15	8	0	46	45	1	5	3	3
	SPL 1	34	32	23	2,443	2,267	176	49	33	33
	SPL 2	28	14	8	111	108	3	6	5	5
Total		160	120	58	6,189	5,798	391	147	105	104



GROUP 2 RESULTS

		Deliverables			Landowner Letters			Information Center		
	District	CASs	SGs	Translated SGs	Ltrs Mailed	Delivered	Undeliverable	Calls	Referred Calls	Resolved Calls
Group 2	NWK	17	17	2	128	122	6	3	3	3
	SWF	22	17	16	504	493	11	20	12	11
	SWT	3	3	1	90	86	4	9	6	6
	POA	3	1	0	3	3	0	0	0	0
	SAJ	15	15	1	80	77	3	2	2	2
	SAS	13	9	0	1,654	1,588	66	29	20	20
	NAB	4	4	0	8	7	1	0	0	0
	NAE	9	8	1	1,006	931	75	43	32	32
	SPK	4	4	4	1,006	990	16	25	16	16
	SPL 1	32	30	25	3,483	3,385	98	79	35	35
	SPL 2	9	7	4	28	28	0	2	2	2
Total		131	115	54	7,990	7,710	280	212	128	127



GROUP 3 RESULTS

		Deliverables			Landowner Letters			Information Center		
	District	CASs	SGs	Translated SGs	Ltrs Mailed	Delivered	Undeliverable	Calls	Referred Calls	Resolved Calls
Group 3	NWK	7	6	2	36	36	0	1	0	0
	NWO	13	13	0	66	65	1			
	SWF	9	9	5						
	SWT	8	8	4						
	POA	6	2							
	POH	3	3							
	SAJ	11	11							
	SAS	9	9							
	NAB									
	NAE									
	SPK									
	SPL 1									
	SPL 2									
Total		66	61	11	102	101	1	1	0	0



US Army Corps
of Engineers®



IC TRENDS (TOP 5 FAQs)

FAQ #	FAQs	Frequency
001	What is the FUDS Notification and Safety Education program?	132
088	Why is USACE informing us about this now? [Why am I getting this letter now?]	72
032	I want to sell this property but now you're telling everyone there might be munitions on it even though the Corps of Engineers itself states in the notification letter that it's just a possibility. I don't think I'll be able to sell it now or get fair market value for it.	36
002	What is the FUDS Program?	36
021	Can the Corps of Engineers come out and inspect my property [tomorrow, next week, next month, etc.]?	35



US Army Corps
of Engineers®



IC TRENDS (TOP 5 NON-FAQS REFERRED TO DISTRICTS)

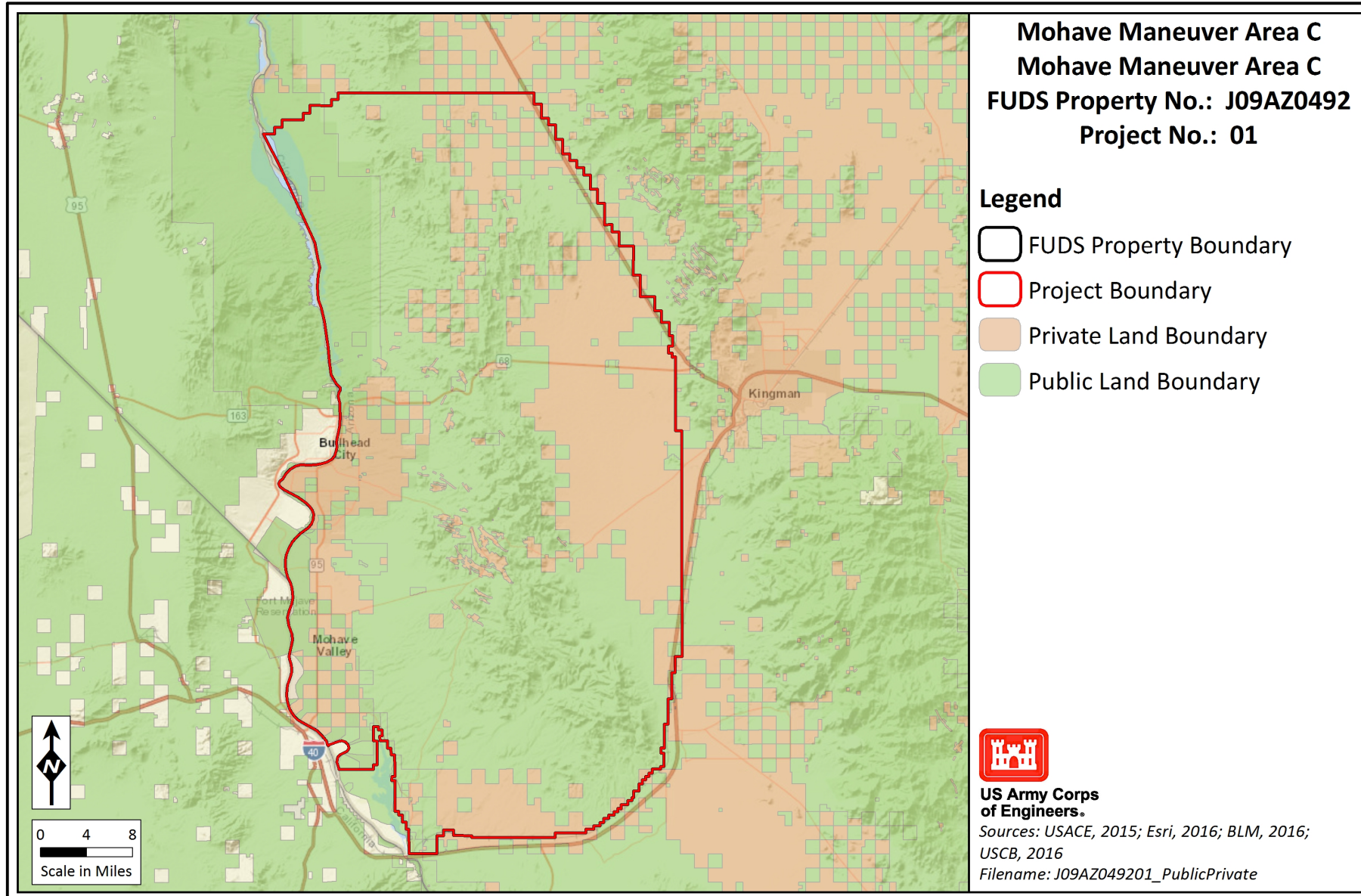
Questions	Frequency
When are they (USACE) coming to conduct further investigations?	47
Why didn't they tell us about this before we purchased the property? Why am I getting this letter now and not when I purchased my property? Did USACE notify the previous owners of this property before I purchased the property or is this the first time they are communicating this information to landowners?	19
What future investigations or activities will USACE perform at my property? How proactive is USACE about investigating this project and other FUDS in the country?	15
What is this letter about?	12
What is my responsibility as a seller? Do I have to disclose this information to future buyers? Do I have to disclose this information to the mowers, landscapers?	12



US Army Corps
of Engineers®



IRM OUTREACH ACTIVITIES



759,618 Acres
~ 80,000 Parcels
~ 56,000 Landowners



**US Army Corps
of Engineers®**



IRM OUTREACH ACTIVITIES

Mohave Maneuver Area C (J09AZ049201)

3Rs Outreach and Education at 3 Schools:

Camp Mohave Elementary School (9 May 2017)

- 350 Students in 3rd, 4th, and 5th Grade

Fort Mojave Elementary School (10 May 2017)

- 250 Students in 1st and 2nd Grade

Mohave Valley Junior High (11 May 2017)

- 450 Students in 6th, 7th, and 8th Grade



US Army Corps
of Engineers®

