OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON
WASHINGTON, DC 20301-3000

ACQUISITION,
TECHNOLOGY
AND LOGISTICS

MAY 01 2007

MEMORANDUM FOR DEPUTY ASSISTANT SECRETARY OF THE ARMY
(ENVIRONMENT, SAFETY, & OCCUPATIONAL HEALTH)
DEPUTY ASSISTANT SECRETARY OF THE NAVY
(ENVIRONMENT)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE
(ENVIRONMENT, SAFETY, & OCCUPATIONAL HEALTH)

SUBJECT: DoD Quality Assurance Guidance for the Munitions Response Site Prioritization Protocol

The Department of Defense (DoD) published the Munitions Response Site Prioritization Protocol as a final rule in the Federal Register on October 5, 2005, codified at 32 CFR Part 179. The Protocol provides a framework for implementing the requirement established by Section 311(b) of the National Defense Authorization Act for Fiscal Year 2002. The Components will use the Protocol to assign a relative priority to each defense site (a.k.a. munitions response site) in the Department's inventory of munitions response sites known are suspected to contain unexploded ordnance, discarded military munitions, and munitions constituents.

DoD developed the attached Quality Assurance Guidance for the Protocol to ensure that the requirements found in the final rule are applied appropriately and consistently across all munitions response sites. This guidance describes QA in the context of the roles and responsibilities of the Components and the ODUSD(I&E), and the opportunities for stakeholder participation. This document includes the QA requirements outlined in the Protocol and also explains other oversight functions and responsibilities associated with the Protocol.

Copies of this memo and the QA guidance are available on the World Wide Web at: https://www.denix.osd.mil/denix/Public/Library/Cleanup/CleanupOfc/index.html.

My staff associate responsible for this QA guidance is Mr. Vic Wieszek, available at (703) 571-9061 or victor.wieszek@osd.mil.

Alex A. Beehler

Alex A. Beehler
Assistant Deputy Under Secretary of Defense
(Environment, Safety and Occupational Health)

Attachment:
As stated

FINAL

DoD Quality Assurance Guidance for the Munitions Response Site Prioritization Protocol (32 CFR Part 179)

PURPOSE

This document provides quality assurance (QA) guidance to the Department of Defense (DoD) Components for the Munitions Response Site Prioritization Protocol (hereinafter the Protocol). The Protocol is the methodology that DoD developed to assign a relative priority for response actions to each defense site (hereinafter munitions response site [MRS]) known or suspected to contain unexploded ordnance, discarded military munitions, or munitions constituents.

While the Protocol outlines a methodology to prioritize MRSs, DoD developed this QA guidance to ensure that requirements found in Section 179.5 of the Protocol are properly addressed. This enables the Components to apply the Protocol appropriately and consistently across all MRSs, preserving accountability and credibility of the Protocol's initial application and subsequent reapplication. This guidance describes QA in the context of the roles and responsibilities of the Components and the Office of the Deputy Under Secretary of Defense for Installations and Environment (ODUSD(I&E)), and the opportunities for stakeholder participation. This document includes QA requirements outlined in the Protocol and also explains other oversight functions and responsibilities associated with the Protocol.

APPLICABILITY AND SCOPE

This guidance applies to each MRS assigned a relative priority in DoD's Inventory of Defense Sites (hereinafter the MRS Inventory). For the purposes of the Protocol, the Components include the Department of the Army, Department of the Navy (including the Marine Corps), and Department of the Air Force. While this guidance outlines general requirements for the Components, each Component shall develop Component-specific guidance that ensures the Protocol is applied in a consistent and appropriate manner.

This document should be used in conjunction with the Protocol.

QUALITY ASSURANCE PANEL

Components will establish a QA Panel composed of Component representatives to review all MRS prioritization decisions. The QA Panel will review and assess the data used to determine an MRS's relative priority to ensure that the priority adequately reflects site-specific conditions and is consistently applied by the Component. If the QA Panel concludes that the Protocol has not been applied to an MRS correctly, the Panel may recommend a change that results in a different priority. If the change does not affect the relative priority (e.g., a change in a data element score that results in the same module rating), the Component does not need to apply all of the procedures set forth in this document but must notify the involved Component organizations of this change.

The QA Panel will be comprised of a minimum of three Component representatives who are trained in the Protocol's application. Components will determine the appropriate level of Protocol training necessary to serve on the QA Panel. The QA Panel will review initially, or as ODUSD(I&E) directs, all MRS relative priorities as determined by the Protocol. However, QA Panelists may not review any MRS in which they were directly involved in the initial Protocol application.

The QA Panel will ensure that the Protocol has been properly and consistently applied. Because a relative priority cannot be finalized without the QA Panel's concurrence, it is essential that the Components provide sufficient information for the QA Panel to replicate, if necessary, the application of the Protocol at an MRS. Recommended QA Panel review practices include:

- Reviewing supporting documentation and validating data entry to ensure that reasonable logic and application of the Protocol's procedures were exercised.
- Ensuring that relative priorities accurately reflect documented MRS conditions.
- Ensuring that equivalent relative priorities reflect similar MRS conditions throughout the Component inventory (i.e., MRSs with similar hazards should have similar prioritizations).

In addition to initial MRS prioritizations, the QA Panel is responsible for reviewing those relative priorities determined by the reapplication of the Protocol. The Protocol requires Components to review each MRS Priority at least annually and update the relative priority, as necessary, to reflect new information. Reapplication of the Protocol is required under any of the following circumstances:

- Upon completion of a response action that changes MRS conditions in a manner that could affect the evaluation under the Protocol.
- To update or validate a previous evaluation at an MRS when new information is available.
- To update or validate the priority assigned based on evaluation of only one or two of the three hazard evaluation modules.
- Upon further delineation and characterization of an MRA into MRSs or an MRS into multiple MRSs.
- To prioritize any MRS previously classified as "Evaluation Pending."

In cases where the QA Panel believes a relative priority was assigned incorrectly, it will change the priority accordingly. The QA Panel's decision, when adopted, will supersede the original priority assigned. Each Component shall develop procedures for updating the original MRS prioritization, if necessary, with the Panel's revised priority. Procedures for updating MRS prioritizations should include providing the relevant stakeholders with the QA Panel's rationale for the change and for provision of stakeholder comments to be heard and addressed before finalizing the change. The QA Panel will not direct activity personnel to reapply the Protocol.

Once an MRS's relative priority is determined, the MRS is sequenced against other MRSs for munitions response actions. The sequencing of an MRS for action will be based primarily on the MRS's relative priority; an MRS with a higher relative risk will usually be addressed before an MRS with a lower relative risk. The QA Panel will conduct the review prior to site sequencing and is not responsible for reviewing site sequencing decisions.

COMPONENT RESPONSIBILITIES

Each Component shall develop guidance for its QA responsibilities based on its own needs and unique requirements but will include, at a minimum, the documentation requirements and procedures specified in this guidance. The Component-specific guidance will include procedures for:

1. Identifying which office is responsible for coordinating the review.
2. Establishing a QA Panel.
3. Providing the QA Panel any information used in the original prioritization decisions and any comments received for review.
4. Reviewing MRS Priorities by the QA Panel.
5. Ensuring that all involved stakeholders are provided at least 30 days to review and comment on the rationale for any proposed change in the priority by the QA Panel.
6. Finalizing the QA Panel's determination of the affected MRS's priority.
7. Notifying all interested parties of the final MRS Priority if any change in the priority is made.
8. Submitting the coordinated final prioritization to ODUSD(I&E) in accordance with the procedures outlined in the *Documentation and Reporting* section of this guidance.
9. Specifying who will maintain all prioritization documents to ensure the Protocol data are auditable.

A copy of the Component-specific guidance is to be provided to ODUSD(I&E) upon issuance.

STAKEHOLDER INVOLVEMENT

DoD believes that early and continuous stakeholder involvement is key to the successful application of the Protocol. Stakeholders include, but are not limited to, federal agencies, state and local regulatory agencies, tribal governments, restoration advisory boards or technical review committees, community members, and current landowners involved in the Protocol's application. Stakeholders are encouraged to participate in the application of the Protocol and to provide feedback on sequencing decisions at an MRS. Additionally, Components must offer stakeholders opportunities to comment on the QA Panel's recommended prioritization changes; however, because the QA Panel serves as a review function, it is only composed of Component personnel.

If a QA Panel proposes a change to a relative priority, the Component is required to notify and provide the stakeholders and Component organizations involved in the Protocol's application at least 30 days to comment on the proposed priority and the QA Panel's rationale for the change. At a minimum, a notice of the proposed change and rationale shall be placed in local community publications or other equivalent media outlets. This notification may include the following information:

- The name (formal and local) and location of the MRS (found in Table A of the Primer Scoring Tables);
- A statement indicating that the MRS is under evaluation pursuant to 32 CFR Part 179;
- A brief description of the munitions-related hazards known or suspected to be present at the MRS and summary of past and current environmental cleanup efforts associated with the MRS (found in Table A of the Primer Scoring Tables);
- The assigned priority, the proposed priority, and the QA Panel's rationale for the change;
- The location of the administrative record (or its equivalent) and MRS-specific information; and
- The Component's point of contact, including, name, telephone number, and e-mail address.

At the end of the comment period, the Component shall ensure that the QA Panel reviews and evaluates all the stakeholder comments received. The Component will finalize the prioritization and notify stakeholders of the final priority.

DOCUMENTATION AND REPORTING

Components shall submit to ODUSD(I&E) the results of the Protocol's application to its MRS Inventory and all other inventory data that 10 USC 2710(c) requires be made publicly available. Beginning in Fiscal Year (FY) 2007, Components must submit the following information to ODUSD(I&E) for each MRS in its MRS Inventory:

- A module rating or alternative module rating for each hazard evaluation module, as appropriate;
- An MRS Priority or Alternative MRS Rating;
- The rationale for a change in an MRS Priority or Alternative MRS Rating, if applicable; and
- The Component's rationale for sequencing an MRS of a lower relative priority before an MRS with a higher relative priority, if applicable.

Data collection for the Protocol will be conducted annually through the Knowledge-Based Corporate Reporting System (KBCRS) data request in November. Definitions for the data fields will be included in the KBCRS dictionary.

In addition to reporting to ODUSD(I&E), the Components shall ensure documentation that influenced the prioritization or sequencing of an MRS, including information provided by and distributed to stakeholders, are maintained as part of the Administrative Record and the project file (or its equivalent). The documentation maintained for each MRS shall meet all legal requirements and shall be sufficient to be auditable and provide full accountability of the Protocol application to an MRS.

ODUSD(I&E) RESPONSIBILITIES

ODUSD(I&E) is responsible for providing oversight of the Protocol's application to all MRSs included in the MRS Inventory. ODUSD(I&E) will collect and maintain all data required by 10 USC 2710(c) and any additional data deemed necessary to provide sufficient oversight and quality control of the Protocol's application. ODUSD(I&E) will review and compare the Components' application of the Protocol for compliance with the Protocol's requirements and consistency in implementation across all Components. Once ODUSD(I&E) determines that the Components are applying the Protocol in a consistent manner and the Protocol's application is leading to decisions that are representative of MRS conditions, it may establish a sampling-based approach for the Components to use for such reviews.

ODUSD(I&E) may identify any inconsistencies found in its review and convey them to the appropriate Component for explanation or correction. ODUSD(I&E) will organize a DoD Protocol Workgroup to exchange information relating to the Protocol's application and discuss lessons learned. The Workgroup will:

- Meet at least annually.
- Be comprised of ODUSD(I&E) and Component representatives.
- Address any discrepancies noted between the Components in the Protocol's application; however, the Workgroup will not direct the Components to assign a specific relative priority.
- Develop and document lessons learned and disseminate such to the Components for distribution, consideration, and action, as appropriate.

ODUSD(I&E) will publish the results of the Protocol's application to the MRS Inventory and inventory data that 10 USC 2710(c) requires be made publicly available in the Defense Environmental Programs Annual Report to Congress for each fiscal year beginning in FY 2007.

When necessary, ODUSD(I&E) shall develop additional policies and guidance to address systemic issues related to the Protocol application and process.