



Munitions Response Site Prioritization Protocol

Module 8. Administrative Requirements

April 2007

Outline

- Summary of Component Responsibilities
- Quality Assurance (QA) of the Protocol
- MRS Sequencing
- Documentation of Results
- Annual Review of Prioritization Decision

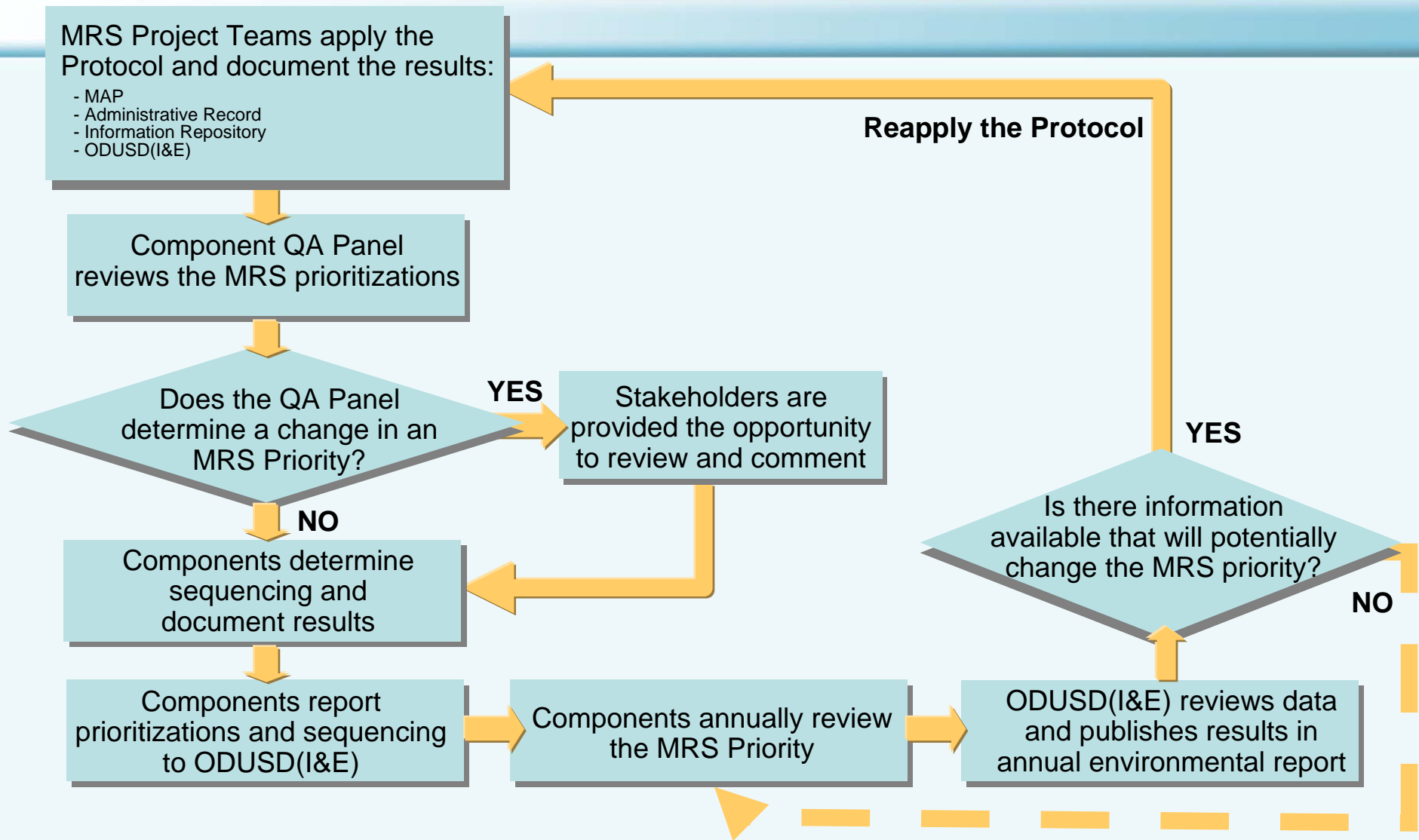


Summary of Component Responsibilities

- The Protocol requires DoD Components to fulfill specific administrative requirements
- Components have the following responsibilities –
 - ◆ Apply the Protocol to all MRSs
 - ◆ Establish a QA Panel
 - ◆ Develop sequencing decisions
 - ◆ Document and report the prioritization and sequencing processes and decisions
 - ◆ Ensure information provided by stakeholders is included in the MRS Administrative Record, Information Repository, or project file
 - ◆ Review each MRS Priority or Alternative MRS Rating at least annually and reapply the Protocol as necessary to reflect new information
 - ◆ Ensure stakeholders are offered opportunities as early as possible and throughout the process to participate in the application of the Protocol and sequencing decisions



Administrative Process



Quality Assurance of the Protocol

- The purpose of Protocol QA is to –
 - ◆ Ensure consistency among the Components' data collection methodologies, application of the Protocol, and use and reporting of Protocol data
 - ◆ Ensure that each MRS Priority appropriately reflects documented MRS conditions
 - ◆ Serve as an internal management and oversight function
 - ◆ Establish and preserve the accountability and credibility of the Protocol evaluations
- Each Component shall develop guidance on the QA requirements to ensure that the Protocol is applied appropriately and consistently across all MRSs



Quality Assurance Panel

- Each Component will form a QA Panel to provide oversight for the application of the Protocol
- The panel will not include any individual involved in applying the Protocol to the MRS under review
- The panel will ensure that the Protocol is applied appropriately and consistently across Component MRSs
- After DoD determines that the Protocol is being applied appropriately and consistently across the Components, DoD may implement a sampling review process
- If the panel recommends a revision that changes an MRS Priority, it will –
 - ◆ Develop a rationale for the change
 - ◆ Allow stakeholders to comment on the rationale before the change is finalized



QA Panel



MRS Sequencing

- 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
- As a matter of DoD policy, an MRS with higher relative risks will be addressed before an MRS with lower relative risks
- However, once an MRS Priority or Alternative MRS Rating is determined, the Component may consider other factors. These other risk-plus factors –
 - ◆ Do not change or influence the MRS Priority or Alternative MRS Rating
 - ◆ May influence sequencing decisions
- DoD ensures that stakeholders are offered opportunities to participate throughout the Protocol's application and in making sequencing recommendations



Factors to be Considered in MRS Sequencing

Examples of Risk-Plus Factors

- Concerns expressed by regulators or stakeholders
- Cultural and social factors
- Economic factors
- Findings of health, safety, or ecological risk assessments or evaluations based on MRS-specific data
- A community's reuse requirements at BRAC installations
- Specialized considerations of tribal trust lands
- Reasonably anticipated future land use
- Implementation and execution considerations
- Mission-driven requirements
- The availability of appropriate technology
- Implementing standing commitments
- Established program goals and initiatives
- Short-term and long-term ecological effects and environmental impacts in general, including injuries to natural resources



Documentation of Results

- The Components shall –
 - ◆ Ensure each installation or property annually documents and updates all aspects of the munitions responses, as well as all sequencing decisions in the MAP or its equivalent
 - ◆ Be responsible for updating and maintaining the MRS Administrative Record, information repository, or project file
 - ◆ Report the results of the Protocol's application to ODUSD(I&E) along with any other inventory data that is required to be made publicly available by 10 USC § 2710(c)
 - ◆ Report justification for sequencing decisions that result in a munitions response at an MRS with a lower relative priority ahead of an MRS with a higher relative priority to ODUSD(I&E)



Documentation locations of Protocol results



Annual Review of Prioritization Decision

- The Components will review each MRS Priority at least annually and reapply the Protocol under any of the following circumstances –
 - ◆ Upon completion of a response action that changes an MRS's conditions in a manner that could affect the evaluation under this Protocol
 - ◆ To update or validate a previous evaluation of 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 more than a single MRS
 - ◆ To categorize any MRS previously assigned an alternative rating of “Evaluation Pending”



Annual Review of Prioritization Decision (cont)

- If new information justifies updating an MRS Priority, the Component shall –
 - ◆ Provide stakeholders the opportunity to review and comment on any changes to the priority originally assigned
 - ◆ Include all required information in the MRS Administrative Record, Information Repository, or project file, if applicable
 - ◆ Include any sequencing changes in subsequent updates to the MAP or its equivalent
- If no new data are available at the time of annual review, the Protocol does not need to be reapplied
- The Components will provide ODUSD(I&E) an updated prioritized list of MRSs annually



Administrative Requirements

Questions?

