Munitions and Explosives of Concern Hazard Assessment (MEC HA) Initiative

> DoD - Munitions Response Committee Sept 12, 2005



Purpose of this Briefing

- Overview Why a MEC HA?
- Discuss the participants, progress, and process
- Discuss what the MEC HA will provide
- Structure overview
- Scoring example "Camp Sample"
- Discuss next steps and outreach
- Emerging issues for Guidance document

Why a MEC HA?

- CERCLA & NCP require "risk assessment"
- Traditional risk assessment methods not applicable to MEC hazards
- Need for consistent method under CERCLA for MEC response actions
- Emphasis for EE/CA, RI/FS analysis to support remedy selection

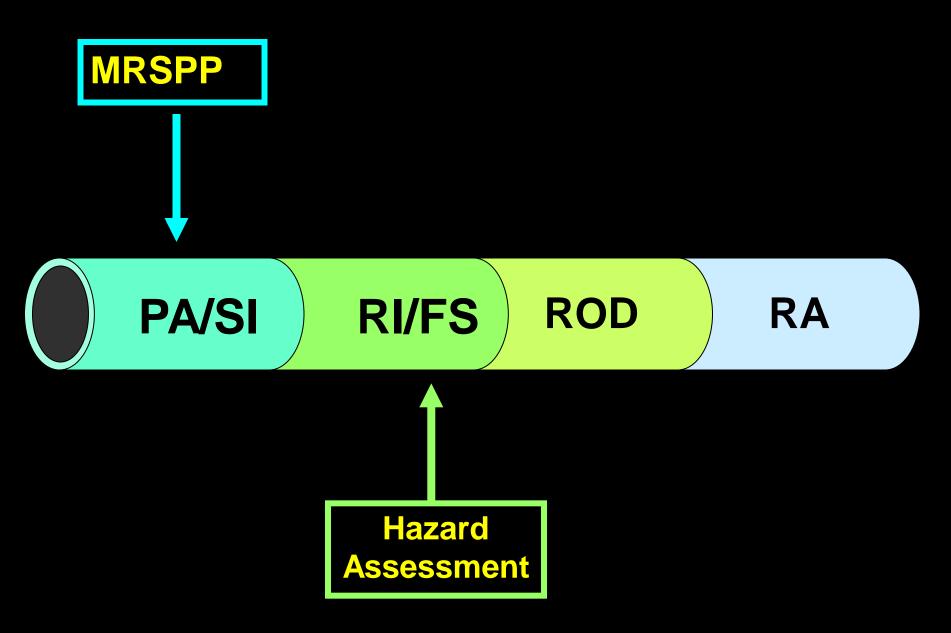
Relationship Between the MEC HA and the MRSPP

- MRSPP Supports Programmatic Goals
 - Provides relative priority for each Munitions Response Site, based on overall risks

- Allows sequencing decisions to consider Other Factors (e.g., programmatic, environmental justice, development)

- MEC HA Supports Site Specific Decisions
 - Removal & Remedial Actions
 - Land Use Activities

CERCLA PROCESS



MEC HA Work Group Participants

EPA
DOD
DOI
ASTSWMO
TASWER

Work Group Underlying Principles

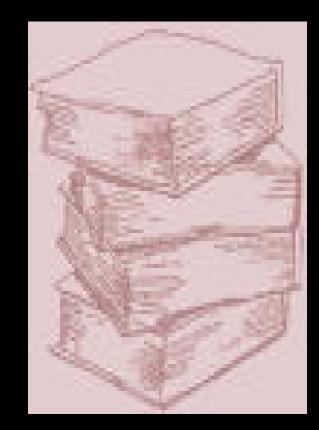
- Support the management of uncertainty
- Connection to the Conceptual Site Model
- Utilize a relative hazard assessment approach

Work Group Underlying Principles

- Rely on input factors compatible with the MRSPP
- Support early decision making
- Support communication with stakeholders.

Work Group Progress

- Issue Papers
- Framework Papers
- Outreach Plan
- Pilot Tests



Issue Papers

- Review of Existing Methods
- Purpose of MEC HA
- Role of Uncertainty
- Probabilistic Risk
- Input Factors
- Analysis of Response Alternatives
- MEC HA as Communication Tool

Framework Papers

- Performance Objectives
- Comparison of MRSPP to MEC HA
- Input Factors
- Structure and Output
- MEC HA in the CERCLA Process

What will the MEC HA Provide ?

- Consistent framework for developing a site-specific hazard assessment
- Assistance in managing uncertainty
- Facilitate site-specific land use activity decisions

What will the MEC HA Provide ?

- Evaluation of hazard management choices – response actions
- Support hazard communication
- Build confidence in decision making process



Relationship to Conceptual Site Model (CSM)

- The CSM components (source, pathways, receptors) are addressed by the MEC HA
- MEC HA organization follows the Hazard Assessment functions

 Recognizes the fundamental differences from human health risk assessment

-Focus on the functions of the MEC HA

- Includes scoring, weighting, and combining input factors
- Will use a relative numeric approach, similar to the approach used in the EHE module of the MRSPP
- The organization of the structure will follow the severity, accessibility and sensitivity components.

The functional relationships addressed in the MEC HA are:

- Severity: The potential severity of the result should an MEC item function.
- Accessibility: The likelihood that a receptor will be able to interact with an MEC item.
- Sensitivity: The likelihood that an MEC item will function should a receptor interact with it.

- Severity: Input Factors
- Filler Type
- Distance to Additional Receptors
- Proximity of Critical Infrastructure
- Proximity of Cultural Resources
- Proximity of Ecological Resources

| Input Factor | Category or Value | Score | | | |
|---|---|-----------|-------------------------|----------------------------|--|
| | | Untreated | Surface MEC Response | Subsurface MEC Response | |
| Filler Type | High Explosive | 100 | 100 | 100 | |
| | Incendiary | 80 | 80 | 80 | |
| | Spotting Charge | 80 | 80 | 80 | |
| | Propellant | 20 | 20 | 20 | |
| Distance of Additional Potential Human Receptors to Explosive Hazard | Within MRS or hazardous distance of the MRS boundary | 30 | 30 | 30 | |
| | Outside of the hazardous distance | 0 | 0 | 0 | |
| | Non-HE filler type | 0 | 0 | 0 | |

Accessibility: Input Factors

- Site Accessibility
- Potential Contact Hours
- Amount of MEC
- MEC Depth Relative to Intrusive Depth
- Migration Potential

| Input Factor | Category or Value | Score | | | |
|-------------------------|----------------------------|-----------|----------------------------|-------------------------------|--|
| | | Untreated | Surface MEC Response | Subsurface MEC Response | |
| Site Accessibility | Full accessibility | 80 | 60 | 15 | |
| | Moderate Accessibility | 55 | 25 | 10 | |
| | Limited Accessibility | 15 | 10 | 5 | |
| | Very Limited Accessibility | 5 | 5 | 5 | |
| Potential Contact Hours | Many Hours | 120 | 90 | 30 | |
| | Some Hours | 70 | 50 | 20 | |
| | Few Hours | 40 | 20 | 10 | |
| | Very Few Hours | 15 | 10 | 5 | |

| Input Factor | Category or Value | Score | | | |
|---------------|--|-----------|----------------------------|----------------------------|--|
| | | Untreated | Surface MEC Response | Subsurface MEC Response | |
| Amount of MEC | Target area | 180 | 120 | 30 | |
| | OB/OD area | 180 | 140 | 30 | |
| | QA function test range | 165 | 90 | 25 | |
| | Burial Pit | 30 | 30 | 10 | |
| | Maneuver areas | 115 | 15 | 5 | |
| | Storage | 25 | 10 | 5 | |
| | Explosive-related industrial facility | 20 | 10 | 5 | |
| | Firing points | 75 | 10 | 10 | |
| | Safety buffer areas (Range safety fans and OB/OD kick-out areas) | 30 | 5 | 5 | |

| Input Factor | Category or Value | Score | | |
|---|---|-----------|-------------------------|----------------------------|
| | | Untreated | Surface MEC Response | Subsurface MEC Response |
| Minimum MEC Depth Relative to the Maximum Intrusive Depth | MEC located on surface | 240 | 25 | Not Applicable |
| | MEC located subsurface, intrusive depth overlaps | 220 | 220 | 150 |
| | MEC located subsurface, intrusive depth does not overlap | 25 | 25 | 25 |
| Migration Potential | Possible | 30 | 30 | 10 |
| | Unlikely | 10 | 10 | 10 |

Sensitivity: Input Factors

- MEC Category
- MEC Size

| Input Factor | Category or Value | Score | | |
|--------------|---------------------------|-----------|-------------------------|----------------------------|
| | | Untreated | Surface MEC Response | Subsurface MEC Response |
| MEC Category | UXO special case | 180 | 180 | 180 |
| | UXO | 110 | 110 | 110 |
| | DMM with category 1 fuzes | 105 | 105 | 105 |
| | DMM with category 2 fuzes | 55 | 55 | 55 |
| | Unfuzed DMM | 45 | 45 | 45 |
| MEC Size | Small | 40 | 40 | 40 |
| | Large | 0 | 0 | 0 |

MEC HA Outputs

- The Output Categories for the MEC HA are based on relative numeric scores
- Score Range is from 115 to 1000
- Score Range is broad enough to differentiate between hazard categories
- Uses a different range than the MRSPP

MEC HA Outputs

The Output Categories Scores for the MEC HA are:

- Category 1:
- Category 2:
- Category 3:
- Category 4:

MEC HA Outputs

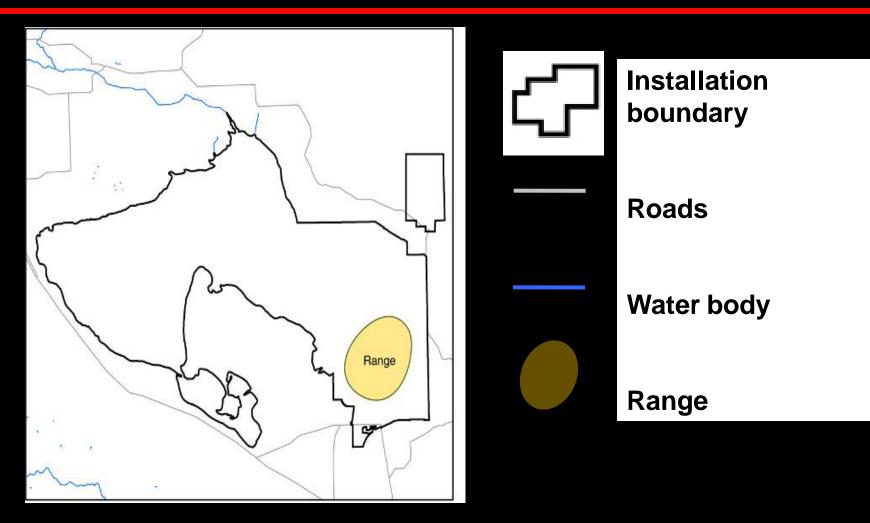
The Output Categories for the MEC HA are:

- Category 1: Sites with the highest hazard potential under current use conditions.
- Category 2: Sites with a hazard potential under current use conditions.
- Category 3: Sites compatible with current uses, not with more intrusive future uses.
- Category 4: Sites compatible with current or future uses.

MEC HA Scoring Example

"Camp Sample"

Historical Research at "Camp Sample" Practice Range Identified



Former "Camp Sample" Site Features

- Undeveloped inside boundaries
- Nature trail through portion of the property
- Existing residential area nearby
- Elementary school planned nearby



"Camp Sample" Historical Information

2.36" rockets used for training
Training in WWII through 1950's





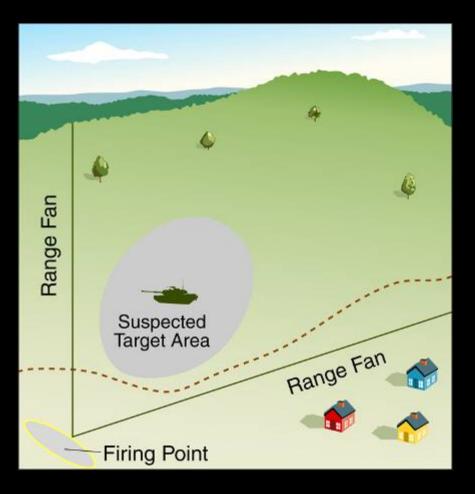
Historical Information

Site boundary

Proposed school location

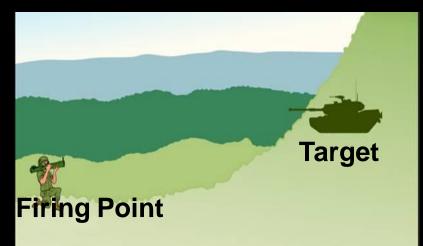


Preliminary Conceptual Site Model



 Suspected locations of

 Firing point
 Range fan

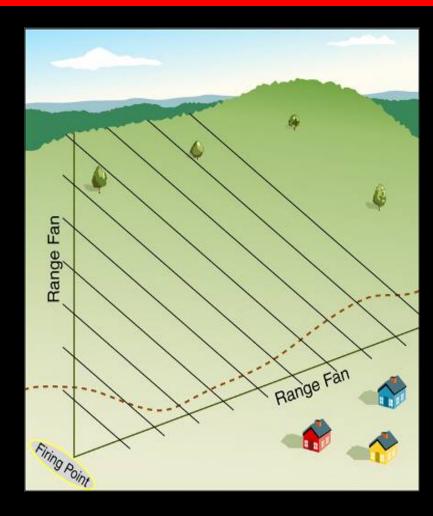


Data Quality Objectives (DQOs)

- Specify the type and quality of data needed to support site investigation
- Statements that :
 - Clarify objectives of data collection
 - Specify how data will be used to support hazard assessment
 - Define appropriate type, quantity, and quality of data to collect
 - Specify acceptable levels of decision errors

Identify Data Needs for Investigation Design

Data Need 1. – Define boundaries of the target area – Define geophysical transect spacing



Identify Data Needs for Investigation Design (Cont)

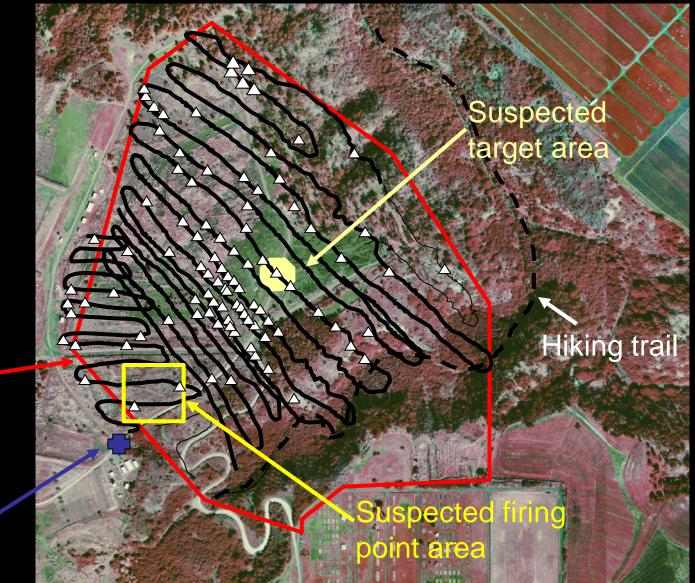
- Data Need 2: Where is the most likely boundary of the target area ?
- Increase transect density over suspected target
- Data Need 3: What are the UXO distributions in the target area ?
- Use of mini-grids to better define nature and extent within target area.

Detected Anomalies

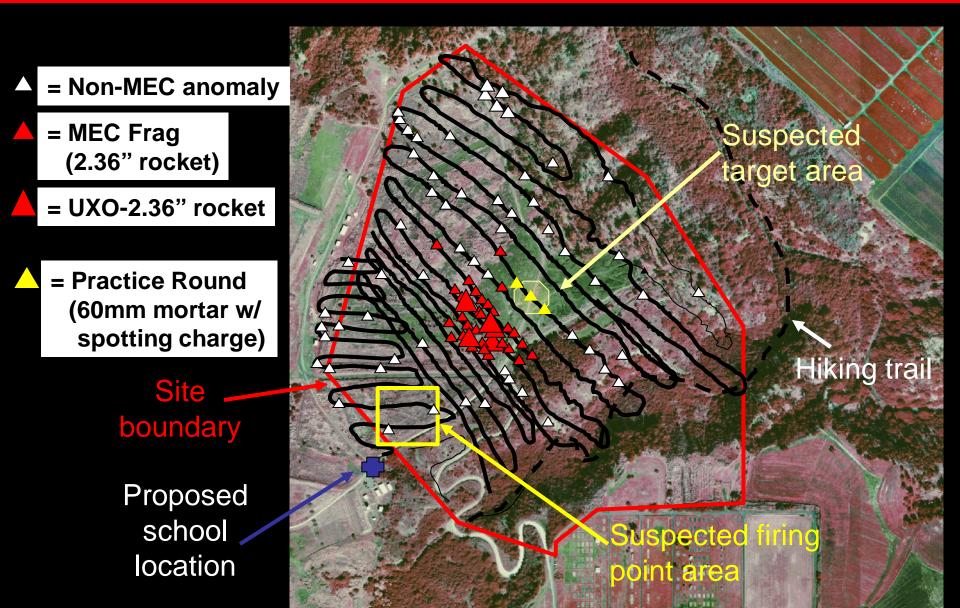
detected anomaly

Site – boundary

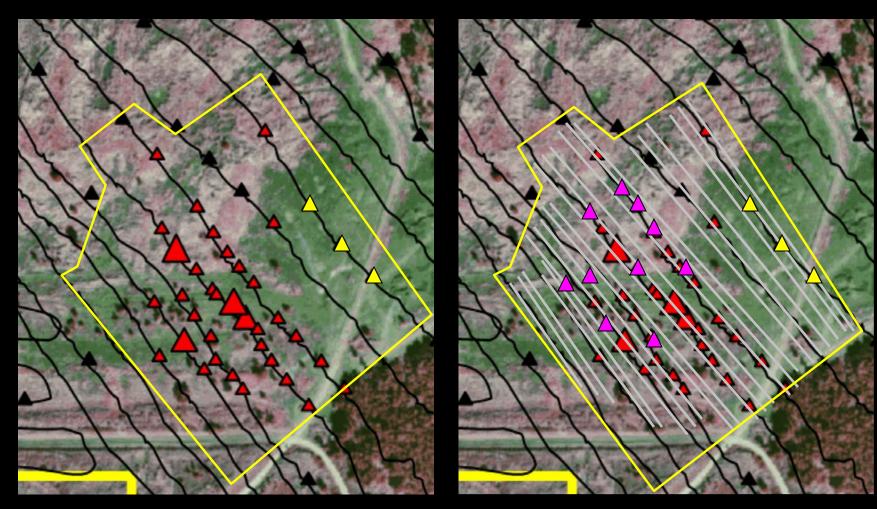
Proposed school location



Anomalies Identified



Results of Increased Transects

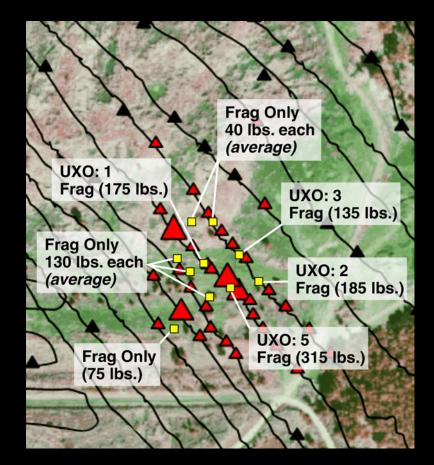


Increased transects in this area

Results of adding 25 foot transects added to investigation

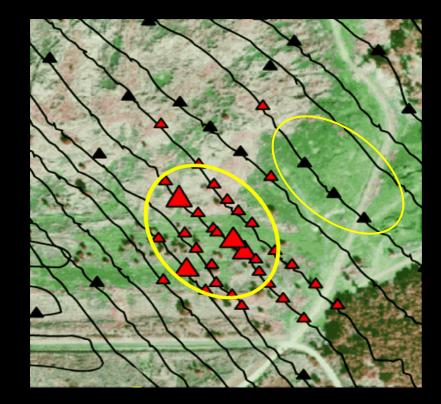
Detailed Sampling Results – Live Target Area

- Items detected: 2.36" rockets (HE) and 2.36" rocket frag
- Depth ranges: Surface to one-foot
- UXO density: estimated 4/acre
- Scrap density: estimated 480 anomalies/acre

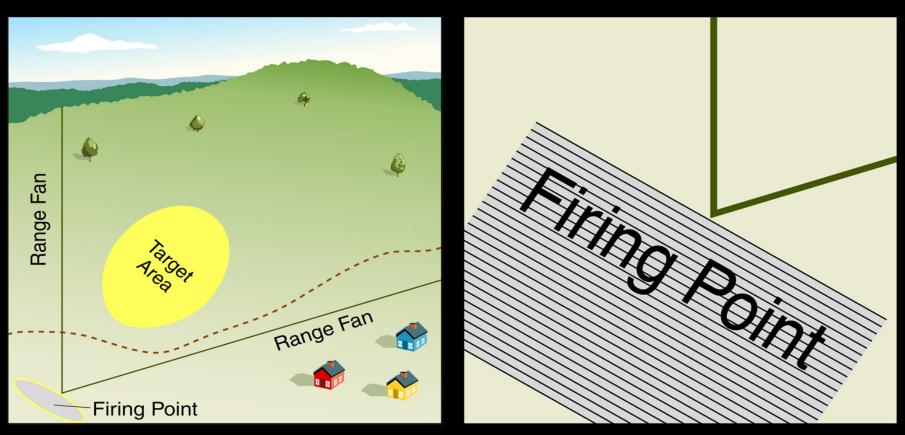


Target Area Delineated – Extent of Contamination

- Estimated area of targets
 - Live target: 17 acres
 - Practice target:
 15 acres



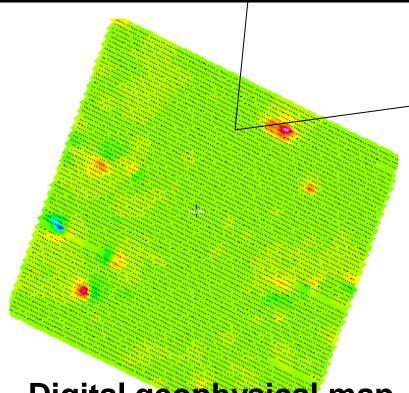
Continuing the Investigation – Firing Point



Investigation of range fan complete 100% investigation of firing point to be conducted

Results of the Investigation of the Firing Point

- Anomalies identified during mapping are cultural features (buried tin rations and metal fence)
- No evidence of buried discarded military munitions found



Digital geophysical map of firing point

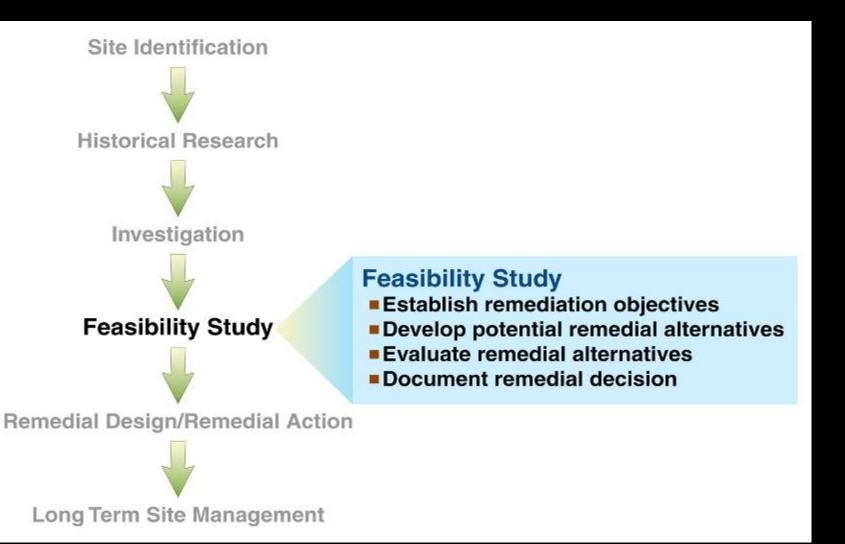
Geophysical Investigation Complete

- Additional site information needed for MEC HA
- Ready to begin feasibility study and site remediation process
- Camp Sample example is a simplified example of an investigation of a munitions response site

Additional Site Information for MEC HA

- Determine distance to additional receptors
- Accessibility determination
- Estimate potential contact hours
- Determine if there are intrusive site activities that could result in contact with MEC items
- Evaluate migration potential

Ready to Begin Feasibility Study



Remediation Objectives for Target Area

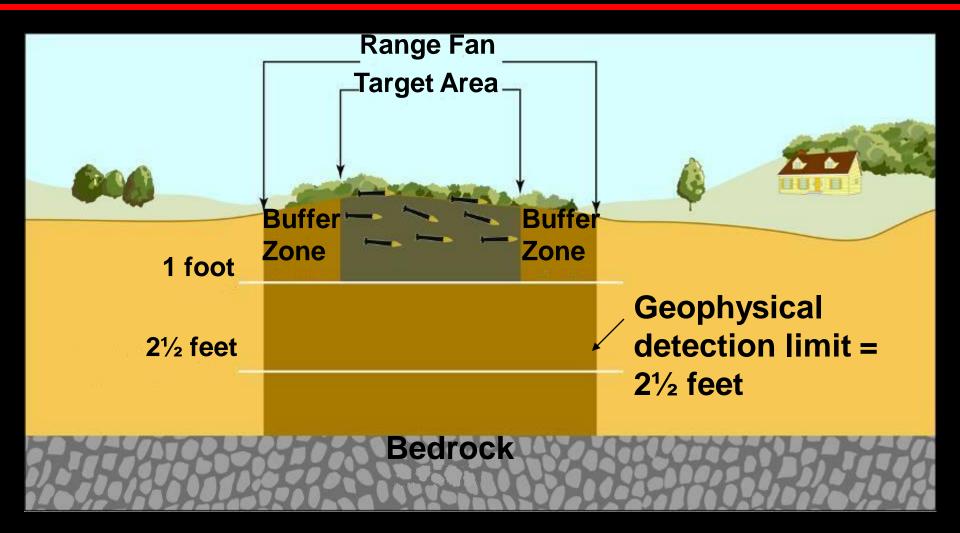
- Target area objective: remove detectable UXO
 - To maximum depth of penetration as determined in investigation
 - Use best available technology
 - To support future land use activities

Developing Specific Remedial Alternatives

 Technology options developed for target area remedial alternatives

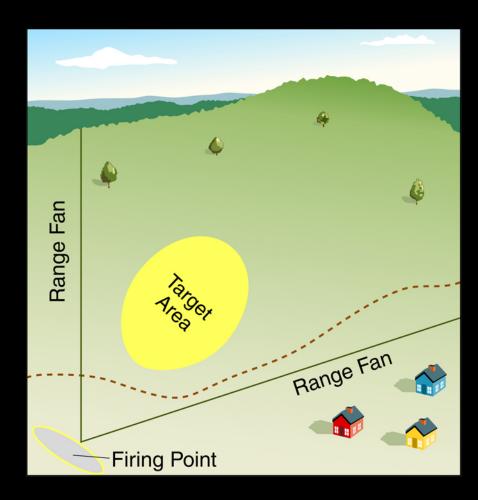
 Alternatives are evaluated using CERCLA nine criteria

Example Alternative: Clearance to Depth of Detection for Target Area



Other Information to Inform the Remedial Alternatives Evaluation

- Consider remediation objectives and land use
- Consider site-specific conditions
 - Proximity to populations
 - Terrain, site geology, vegetation
 - Nature and extent of contamination
 - Cultural and ecological resources



Scoring Example: 2.36" Rockets

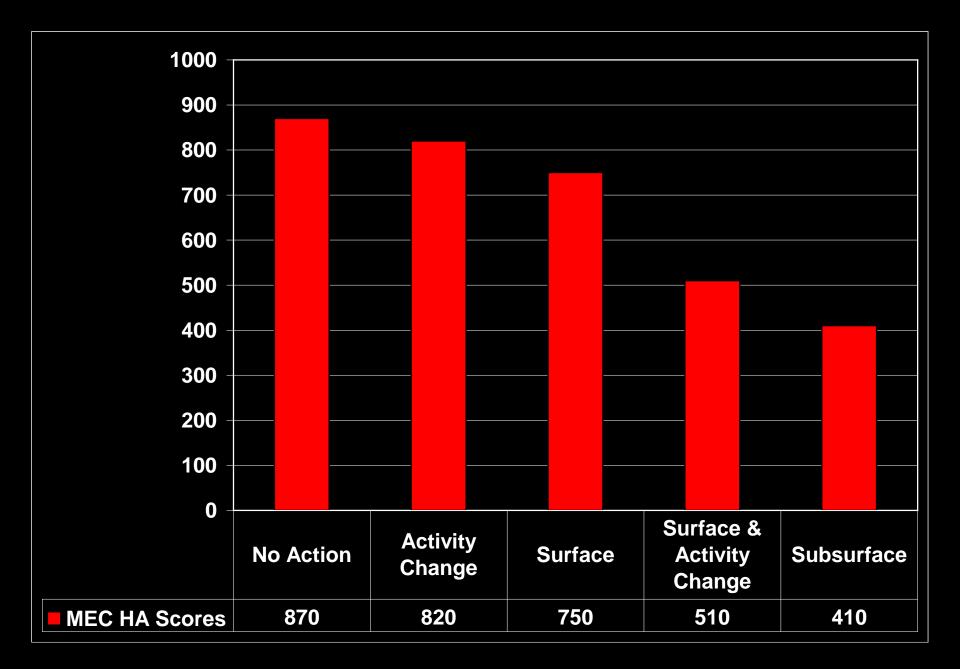
| | Current Conditions | |
|--|-----------------------------------|-------|
| Input Factor | Input Factor Category | Score |
| Type of Filler | High Explosive | 100 |
| Distance between additional receptors and explosive hazard | Outside of the hazardous distance | 0 |
| Site Accessibility | Full accessibility | 80 |
| Potential Contact Hours | Few Hours | 40 |
| Amount of MEC | Target area | 180 |
| Minimum MEC Depth/ Maximum Intrusive Depth | MEC located on surface | 240 |
| Migration Potential | Unlikely | 10 |
| MEC Category | UXO, Special Case | 180 |
| MEC Size | Small | 40 |
| Total Scores | | 870 |
| | Output Category | 1 |

Remedial Alternatives for Camp Sample Target Areas

- No Action
- Land Use Activity Change
- Surface Treatment
- Surface Treatment and Land Use Activity Change
- Subsurface Treatment

Remedial Alternatives Outputs for 2.36 "Rocket Target Area

- No Action Category 1
- Land Use Activity Change Category 2
- Surface Treatment Category 2
- Surface Treatment and Land Use Activity Change – Category 3
- Subsurface Treatment Category 4

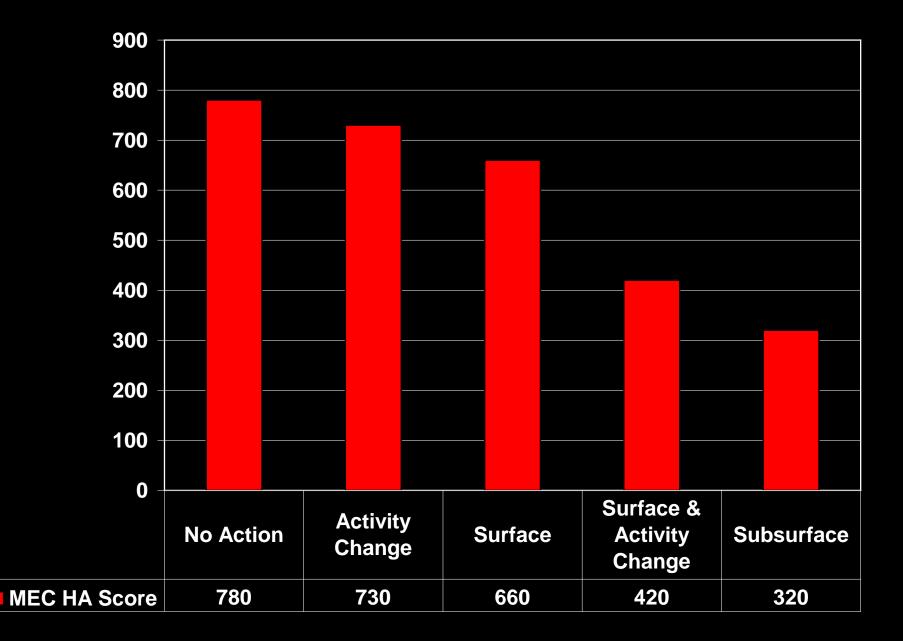


Scoring Example: Practice Target Area

| | Current Conditions | |
|--|-------------------------------------|-------|
| Input Factor | Input Factor Category | Score |
| Type of Filler | Spotting Charge | 80 |
| Distance between additional receptors and explosive hazard | Outside of the hazardous distance | 0 |
| Site Accessibility | Full accessibility | 80 |
| Potential Contact Hours | Few Hours | 40 |
| Amount of MEC | Target area | 180 |
| Minimum MEC Depth/ Maximum Intrusive Depth | MEC located on surface & Subsurface | 240 |
| Migration Potential | Unlikely | 10 |
| MEC Category | UXO, Normal Fuze | 110 |
| MEC Size | Small | 40 |
| Total Scores | | 780 |
| | Output Category | 2 |

Remedial Alternatives Outputs for Practice Target Area

- No Action Category 2
- Land Use Activity Change Category 2
- Surface Treatment Category 3
- Surface Treatment and Land Use Activity Change – Category 4
- Subsurface Treatment Category 4

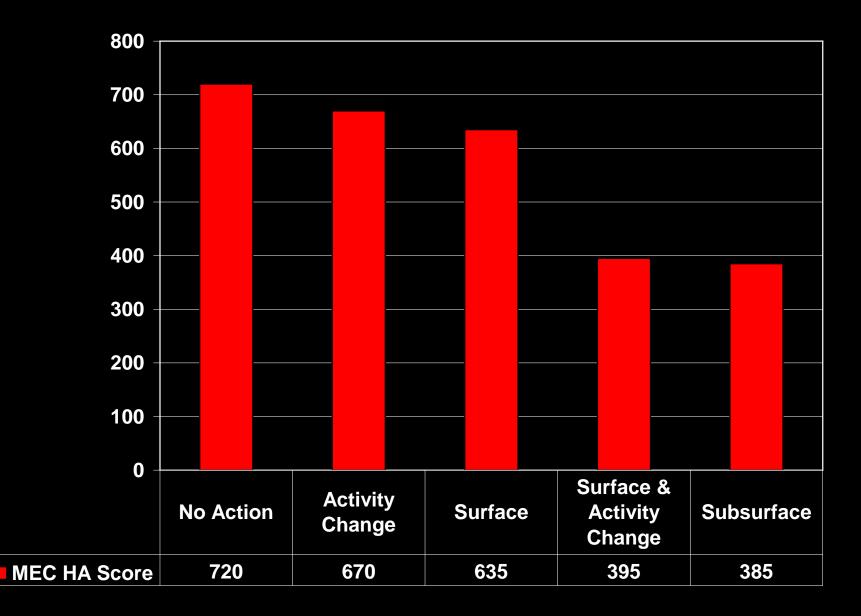


Scoring Example: Range Safety Fan

| | Current Conditions | |
|--|-------------------------------------|-------|
| Input Factor | Input Factor Category | Score |
| Type of Filler | High Explosive | 100 |
| Distance between additional receptors and explosive hazard | Outside of the hazardous distance | 0 |
| Site Accessibility | Full accessibility | 80 |
| Potential Contact Hours | Few Hours | 40 |
| Amount of MEC | Safety buffer area | 30 |
| Minimum MEC Depth/ Maximum Intrusive Depth | MEC located on Surface & Subsurface | 240 |
| Migration Potential | Unlikely | 10 |
| MEC Category | UXO, Special Case | 180 |
| MEC Size | Small | 40 |
| Total Scores | | 720 |
| | Output Category | 2 |

Remedial Alternatives Outputs for Range Fan

- No Action Category 2
- Land Use Activity Change Category 3
- Surface Treatment Category 3
- Surface Treatment and Land Use Activity Change – Category 4
- Subsurface Treatment Category 4



Evaluating the Remedial Alternatives

- Apply CERCLA nine criteria to remedial alternatives:
- Threshold criteria
 - Protection of human health and the environment.
 - Compliance with applicable or relevant and appropriate requirements (ARARs)
- Balancing criteria
 - Long-term effectiveness and permanence
 - Reduction of toxicity, mobility or volume through treatment
 - Short-term effectiveness
 - Implementability
 - Cost
- Modifying criteria
 - State acceptance
 - Community acceptance



Outreach Plan

- The Outreach Plan includes:
 - Munitions Response Committee involvement
 - -Opportunities for Stakeholder involvement.
 - -Schedule for informational briefings.
 - -Use of outlets such as websites, fact sheets, and mailing lists.
 - -www.epa.gov/fedfac/documents/munitions/



- Incorporate Pilot Test Feedback
- Stakeholder Workshop
- Draft Guidance in Early 2006



Pilot Test Process

- Camp Beale complete, Camp Butner complete on August 9th
- Interaction between project teams and MEC HA TWG on framework details
- Evaluation of MEC HA, feedback to TWG
- Modifications to framework in response to pilot process with project teams
- Identification of guidance issues

Pilot Test Objectives

Evaluation & Feedback

- -Usability
- -Transparency
- -Consistency
- Do the input factors make sense ?
- -Does the weighting & scoring work well?
- Do the output factors make sense ?

Pilot Test Objectives

- Reality checks based on site-specific data & evaluations from project teams
- Modifications to framework
- Identification of issues for guidance development

Emerging Issues for Guidance Document

- Emphasis on collaborative decisionmaking
- Clear instructions on use of MEC HA needed
- Sufficiency & quality of data
- Use of MEC HA to support NOFA

Emerging Issues for Guidance Document

- Should Construction Support be included in MEC HA scoring?
- Activity (intrusiveness) has greater emphasis than land use category
- Scores are relative
- Greater scoring reduction for clearance than for activity or access changes
- Output category descriptions qualitative

Questions?

Kevin Oates 334-270-3427 oates.kevin@epa.gov