

NAOC 2019 GENERAL MEMBERSHIP MEETING

Presenter: John Sikes

Title: *USACE MMRP Policy/Procedures Updates*

USACE Environmental and Munitions CX

Date: 11 December 2019



**US Army Corps
of Engineers®**



ANYONE HERE FROM SOUTH DAKOTA?





TODAY'S TOPICS



- Institutional Analysis
 - Remedial Investigation (RI) Report
 - Feasibility Study
- EM CX Independent Technical Review (ITR) Process
- SES Approval of MMRP QAPPs
- Quick Policy and Guidance update





INSTITUTIONAL ANALYSIS IN THE RI REPORT



Include the following:

- State if pre-existing LUCs are in place and their impact on baseline risk determinations.
- Describe any ecological or cultural restrictions in place that could impact development of alternatives in an FS.
- Summarize current and reasonably anticipated future land use, receptors and pathway, including frequency of use, and associated activities.
- List stakeholders (city/local/state government agencies; private, federal and state land owners) with the potential to implement and support LUCs if necessary. (This is not meant to be a detailed analysis at this point, but we should have some idea of the opportunities that exist to implement LUC's).



INSTITUTIONAL ANALYSIS IN THE FS



Once the RAO has been defined:

- ❖ Develop specific LUC options that can achieve the RAO as a standalone alternative or in conjunction with other alternatives.
- ❖ Engage specific stakeholders/agencies to determine the appropriateness, capability and willingness of the stakeholder/agency to implement, maintain, and/or enforce specific LUCs.
- ❖ Five (5) elements to consider:
 - ✓ Jurisdiction of the Agency
 - ✓ Authority Exercised by the Agency within its Jurisdiction
 - ✓ Mission of the Agency
 - ✓ Capability of the Agency
 - ✓ Desire of the Agency to Participate
- ❖ This information then is used in the screening and detailed analysis of alternatives under implementability and short/long term effectiveness.
- ❖ Key point – each individual LUC considered must go through the analysis, do NOT simply provide a laundry list of potential LUC's and think you are good. Each one must address some specific aspect of the risk and contribute to risk reduction.



LAND USE CONTROL – WAS THE RAO ACHIEVED?





EM CX INDEPENDENT TECHNICAL REVIEW (ITR)



We have modified our internal processes (again) – but we need you (the PDT) to play with us





CHANGES TO EM CX ITR SOP



- EMCX has updated Document Review Lead assignments:
 - Leads:
 - **Primary Lead All MMRP – John Sikes**
 - INPR / PA Lead - Kari Meier
 - Five Year Review Lead - Mike Bailey
 - MRSPF Lead - Jim Manthey
- Change in SOP to encourage more coordination between EM CX and PDT.
- **District PM and PDT, contact the EM CX Lead or reviewer(s) to discuss draft Response To Comments (RTC) before formal responses are submitted.**
- Unresolved comments will be elevated to the Division.

 US Army Corps Of Engineers Engineering and Support Center, Huntsville	Work Instruction CEHNC-WI-CX 70-02 Document Review Process		 Huntsville Center
	Effective Date: 14 February 2013 Issue: 4 Revision: 0		

Authorized by: EM CX Director
 Process Owner (PO): Dave Splichal, Chief EMG
 Generated By: John Sikes
 Reviewed By: Splichal, Meyer, Peterson, Heaton, Vancleef
 Approved By: John Nebelsick, Director EM CX

No changes can be made to this document without the agreement of the authorizing signatory and must be approved by the authorizing signatory before implementation.

Date	Issue	Revision	Description	Approved By
14 Feb 13	1	N/A	Original Document	/s/
1 August 13	2	0	Substantial revision made to incorporate new comment template and update EM CX Lead roles and responsibilities.	/s/
10 Sep 15	2	1	Periodic review and update.	/s/
1 Oct 18	3	0	Periodic review. New issue to update management and software changes since last revision.	/s/
14 Nov 19	4	0	Periodic review.	/s/

This document will be reviewed as detailed:

Next Review Due:	Aug 2015	Aug 2017	Oct 2019	Oct 2020		
Action By:	Chief, EMG	Chief, EMG	Chief, EMG	Chief, EMG		



CHANGES TO EMCX COMMENT PROCESS



- EMCX comment system modification.
- **CX significant comments must identify reason:**
 - Cost - Significant potential cost savings while maintaining work quality
 - Facts - Misrepresentation/omission of significant facts or details
 - Safety – Significant safety risk
 - Flaw – Flaws directly affect success/validity of work
 - Policy – Not in accordance with Policy, Guidance or Regulation.
- **If it doesn't fit one of the five options; the comment is not significant.**

The screenshot shows the 'EM CX Document Review - Entry' web application interface. At the top, there is a green header with the title and a US Army Corps of Engineers logo. Below the header, the interface is divided into several sections:

- TADDS Document # 82158**: A dropdown menu showing the document number and a preview of the document content: 'Draft - Training Materials - QA Review, Explosive Safety for OESS, Course # 204, FUDS Program Training, Environmental and Munitions Center of Expertise, US Army Engineering and Support Center, Huntsville AL/Omaha NE.'
- Reviewer**: A dropdown menu showing 'JAS'.
- Date Stamp**: A dropdown menu showing '25-Nov-19'.
- Discipline**: A dropdown menu showing 'MEC Response'.
- Comment Type**: A dropdown menu showing 'Significant'.
- Issue Type**: A dropdown menu showing 'Facts'.
- Global** and **Coordination**: Two checkboxes, both of which are unchecked.
- Section**, **Page**, and **Line**: Three input fields for identifying the location of the comment.
- Comment: 16**: A text area containing the comment: 'This is the BEST group of attendees of any NADC meeting EVER!!!'.
- Recommendation**: A text area containing the recommendation: 'Great job!!'.
- Definitions**, **Spell Check**, **Use Std. Cmt.**, and **Save as Std.**: A vertical stack of buttons on the left side of the interface.
- Citation/Reference/Standard** and **Related Documents**: Two empty text areas at the bottom of the main content area.
- Footer**: A dark blue bar at the bottom containing several buttons: 'View Saved Comments', 'Find Related Comments', 'Save Comment', 'New Document', 'go BACK WITHOUT save', and 'go BACK with SAVE'.



MR-QAPP SES SIGNATURE - HEADS UP



Because of significant developments of geophysical technology during the past ten years, analog tools currently do not represent the best available science for most applications. Specifically, they do not provide a permanent, auditable record of the data, and do not generate data capable of being substantially reproduced. Developing rigorous QC measures capable of assessing operator performance is more challenging and less precise than for digital methods. For these reasons analog geophysical tools should not be used for munitions response activities, except in rare cases where threatened or endangered vegetation or difficult terrain precludes the use of digital tools. Furthermore, when using analog technology and making analog data publicly available, project teams must disclose the uses and limitations of the data; specifically, the probability of detection is inferior to that achieved using digital methods and the manner in which coverage is assessed is qualitative and subjective.

9. The undersigned concur that the use of analog technology is justified in area (to be completed)

a. Lead Organization, Flag Level

(name/title/signature/date)

b. Lead Regulatory Agency

(name/title/signature/date)

EMCX will be tasked with insuring signature is obtained prior to finalizing QAPP and mobilization.



USACE GUIDANCE AND POLICY UPDATES



ER 200-3-1 - FUDS Program Regulation:

- Approval of HQUSACE leadership after OSD final coordination

FUDS Handbook:

- Approval of HQUSACE leadership after OSD final coordination

EP 1110-1-18 – Ordnance and Explosives Response:

- Rescinded by EC 25-1-365
- For now – Use IGD 06-04 (Draft EP 1110-1-18 – April 2006)

EM 385-1-97 – Explosives Safety and Health Requirements Manual:

- Seeking funding to update

EM 200-1-15 – Technical Guidance for Military Munitions Response Actions:

- 78 comments from NAOC
- 228 comments from USACE
- ***By this time next year:***
 - ***NAOC and USACE review of revision completed, and comments addressed***
 - ***HQ USACE staffing in progress***





QUESTIONS?



What are “Caution Ripples” and why do motorcycles use them?