

Session 5

Prioritization, Sequencing, and Admin Requirements



Table 29
MRS Priority

DIRECTIONS: In the chart below, circle the letter **rating** for each module recorded in Table 10 (EHE), Table 20 (CHE), and Table 28 (HHE). Circle the corresponding numerical **priority** for each module. If information to determine the module rating is not available, choose the appropriate alternative module rating. The MRS priority is the single highest priority; record this number in the **MRS or Alternative Priority** box at the bottom of the table.

Note: An MRS assigned Priority 1 has the highest relative priority; an MRS assigned Priority 8 has the lowest relative priority. Only an MRS with CWM known or suspected to be present can be assigned Priority 1; an MRS that has CWM known or suspected to be present cannot be assigned Priority 8.

EHE Rating		CHE Rating		HHE Rating	
Priority	Priority	Priority	Priority	Priority	Priority
		A	1		
A	2	B	2	A	2
B	3	C	3	B	3
C	4	D	4	C	4
D	5	E	5	D	5
E	6	F	6	E	6
F	7	G	7	F	7
G	8			G	8
Evaluation Pending		Evaluation Pending		Evaluation Pending	
No Longer Required		No Longer Required		No Longer Required	
No Known or Suspected Explosive Hazard		No Known or Suspected CWM Hazard		No Known or Suspected MC Hazard	
MRS or ALTERNATIVE PRIORITY					

Determining an MRS's Priority (cont)

Table 29
MRS Priority

DIRECTIONS: In the chart below, circle the letter **rating** for each module recorded in Table 10 (EHE), Table 20 (CHE), and Table 28 (HHE). Circle the corresponding numerical **priority** for each module. If information to determine the module rating is not available, choose the appropriate alternative module rating. The MRS priority is the single highest priority; record this number in the **MRS or Alternative Priority** box at the bottom of the table.

Note: An MRS assigned Priority 1 has the highest relative priority; an MRS assigned Priority 8 has the lowest relative priority. Only an MRS with CWM known or suspected to be present can be assigned Priority 1; an MRS that has CWM known or suspected to be present cannot be assigned Priority 8.

EHE Rating	Priority	CHE Rating	Priority	HHE Rating	Priority
		A	1		
A	2	B	2	A	2
B	3	C	3	B	3
C	4	D	4	C	4
D	5	E	5	D	5
E	6	F	6	E	6
F	7	G	7	F	7
G	8			G	8
Evaluation Pending		Evaluation Pending		Evaluation Pending	
No Longer Required		No Longer Required		No Longer Required	
No Known or Suspected Explosive Hazard		No Known or Suspected CWM Hazard		No Known or Suspected MC Hazard	
MRS or ALTERNATIVE PRIORITY				2	

Circle the priority associated with each module rating from Tables 10, 20, and 28

The MRS's priority is determined by the single highest module priority



MRS Priority

MRS priority is determined by reviewing the three module ratings and selecting the module that has the highest hazard rating

		CHE Module Rating	
EHE Module Rating			HHE Module Rating
	Hazard Evaluation A 2	Hazard Evaluation A (Highest) 1	
Hazard Evaluation A 2		Hazard Evaluation B 2	Hazard Evaluation A 2
Hazard Evaluation B 3		Hazard Evaluation C 3	Hazard Evaluation B 3
Hazard Evaluation C 4		Hazard Evaluation D 4	Hazard Evaluation C 4
Hazard Evaluation D 5		Hazard Evaluation E 5	Hazard Evaluation D 5
Hazard Evaluation E 6		Hazard Evaluation F 6	Hazard Evaluation E 6
Hazard Evaluation F 7		Hazard Evaluation G 7	Hazard Evaluation F 7
Hazard Evaluation G (Lowest) 8			Hazard Evaluation G (Lowest) 8



Alternative Outcome – Evaluation Pending

Table 29
MRS Priority

DIRECTIONS: In the chart below, circle the letter **rating** for each module recorded in Table 10 (EHE), Table 20 (CHE), and Table 28 (HHE). Circle the corresponding numerical **priority** for each module. If information to determine the module rating is not available, choose the appropriate alternative module rating. The MRS priority is the single highest priority; record this number in the **MRS or Alternative Priority** box at the bottom of the table.

Note: An MRS assigned Priority 1 has the highest relative priority; an MRS assigned Priority 8 has the lowest relative priority. Only an MRS with CWM known or suspected to be present can be assigned Priority 1; an MRS that has CWM known or suspected to be present cannot be assigned Priority 8.

EHE Rating	Priority	CHE Rating	Priority	HHE Rating	Priority
		A	1		
A	2	B	2	A	2
B	3	C	3	B	3
C	4	D	4	C	4
D	5	E	5	D	5
E	6	F	6	E	6
F	7	G	7	F	7
G	8			G	8
Evaluation Pending		Evaluation Pending		Evaluation Pending	
No Longer Required		No Longer Required		No Longer Required	
No Known or Suspected Explosive Hazard		No Known or Suspected CWM Hazard		No Known or Suspected MC Hazard	
MRS or ALTERNATIVE PRIORITY					

- DoD intends for the Protocol to be applied to an MRS as soon as sufficient information is available to complete any module
- When sufficient information is not available to score any module, an MRS should be assigned a status of Evaluation Pending
- MRSs assigned a status of Evaluation Pending shall be programmed for additional study



Alternative Outcome – Prioritization No Longer Required

Table 29
MRS Priority

DIRECTIONS: In the chart below, circle the letter **rating** for each module recorded in Table 10 (EHE), Table 20 (CHE), and Table 28 (HHE). Circle the corresponding numerical **priority** for each module. If information to determine the module rating is not available, choose the appropriate alternative module rating. The MRS priority is the single highest priority; record this number in the **MRS or Alternative Priority** box at the bottom of the table.

Note: An MRS assigned Priority 1 has the highest relative priority; an MRS assigned Priority 8 has the lowest relative priority. Only an MRS with CWM known or suspected to be present can be assigned Priority 1; an MRS that has CWM known or suspected to be present cannot be assigned Priority 8.

EHE Rating	Priority	CHE Rating	Priority	HHE Rating	Priority
		A	1		
A	2	B	2	A	2
B	3	C	3	B	3
C	4	D	4	C	4
D	5	E	5	D	5
E	6	F	6	E	6
F	7	G	7	F	7
G	8			G	8
Evaluation Pending		Evaluation Pending		Evaluation Pending	
No Longer Required		No Longer Required		No Longer Required	
No Known or Suspected Explosive Hazard		No Known or Suspected CWM Hazard		No Known or Suspected MC Hazard	
MRS or ALTERNATIVE PRIORITY					

- **Prioritization No Longer Required indicates all necessary munitions responses have been completed. This rating requires that –**
 - ◆ DoD has conducted a final response
 - ◆ All objectives set out in the decision document has been achieved
 - ◆ No further action, except for long-term management and recurring reviews, is required

- **This outcome is used only when all three hazard evaluation modules are rated as Prioritization No Longer Required**



Alternative Outcome – No Known or Suspected Hazard

Table 29
MRS Priority

DIRECTIONS: In the chart below, circle the letter **rating** for each module recorded in Table 10 (EHE), Table 20 (CHE), and Table 28 (HHE). Circle the corresponding numerical **priority** for each module. If information to determine the module rating is not available, choose the appropriate alternative module rating. The MRS priority is the single highest priority; record this number in the **MRS or Alternative Priority** box at the bottom of the table.

Note: An MRS assigned Priority 1 has the highest relative priority; an MRS assigned Priority 8 has the lowest relative priority. Only an MRS with CWM known or suspected to be present can be assigned Priority 1; an MRS that has CWM known or suspected to be present cannot be assigned Priority 8.

EHE Rating	Priority	CHE Rating	Priority	HHE Rating	Priority
		A	1		
A	2	B	2	A	2
B	3	C	3	B	3
C	4	D	4	C	4
D	5	E	5	D	5
E	6	F	6	E	6
F	7	G	7	F	7
G	8			G	8
Evaluation Pending		Evaluation Pending		Evaluation Pending	
No Longer Required		No Longer Required		No Longer Required	
No Known or Suspected Explosive Hazard		No Known or Suspected CWM Hazard		No Known or Suspected MC Hazard	
MRS or ALTERNATIVE PRIORITY					

- This outcome is reserved for MRSs where there is evidence that there are no known or suspected hazards
- Physical and historical evidence must *affirmatively* support this classification
- This outcome is only used as the MRS Priority when all three hazard evaluation modules are rated No Known or Suspected Hazards



MRS Sequencing

- 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's priority is determined, the Component may consider other factors. These other, or risk-plus, factors –
 - ◆ Do not change or influence the MRS Priority
 - ◆ May influence sequencing decisions
- DoD ensures that stakeholders are offered opportunities to participate throughout the Protocol's application and in making sequencing recommendations



Risk-Plus Factors

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



Stakeholder Involvement in MRS Sequencing

Stakeholders have the opportunity to provide input into and review and comment on how MRSs are sequenced for funding

Sequencing 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
- Reasonably anticipated future land use
- A community's reuse requirements at Base Realignment and Closure (BRAC) installations
- Specialized considerations of tribal trust lands
- 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

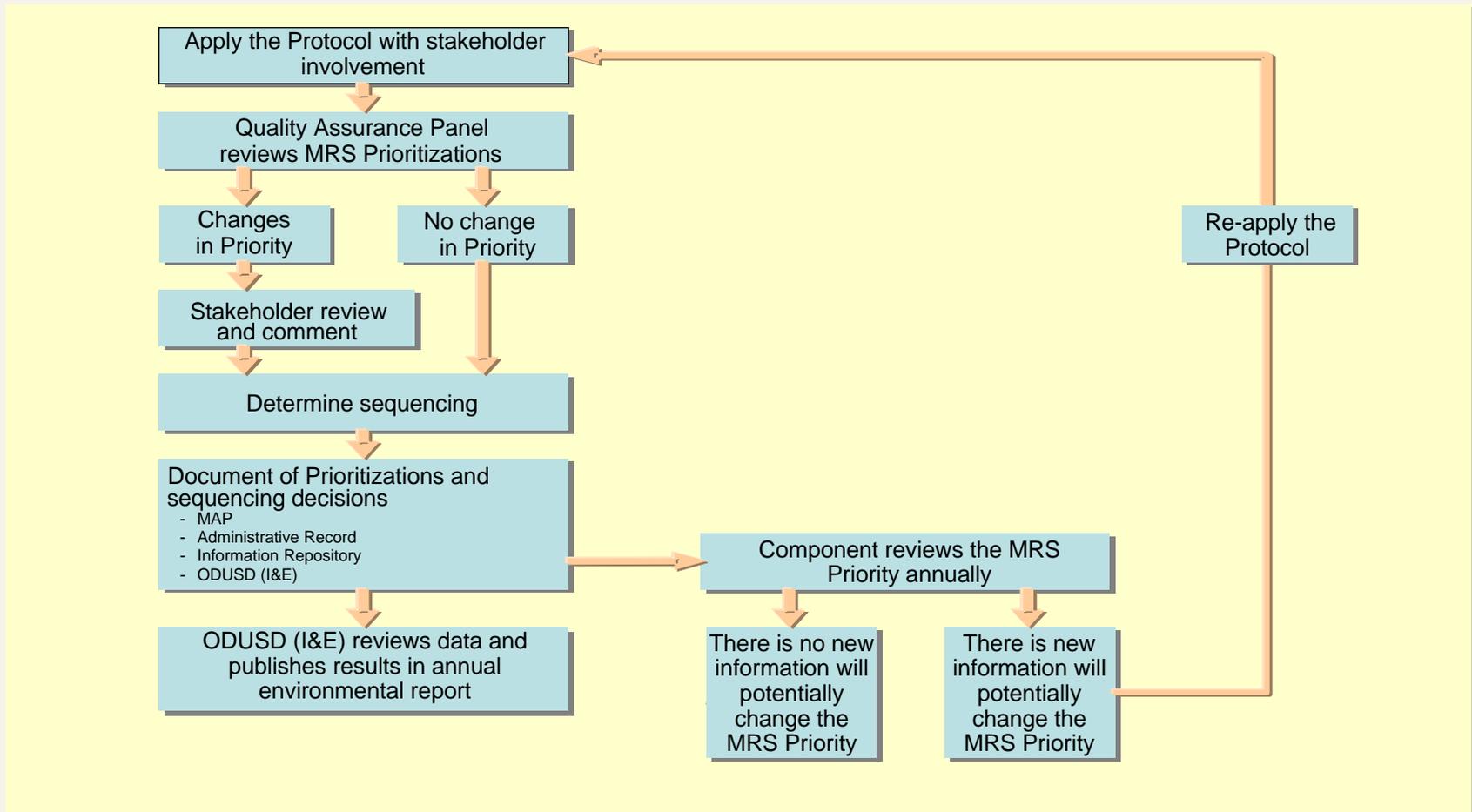


Admin Requirements

- The Protocol requires DoD Components to fulfill specific administrative requirements
- Components have the following responsibilities –
 - ◆ Apply the Protocol to all MRSs within each MRA under its administrative control
 - ◆ Establish a QA Panel of Component personnel to review, initially, all MRS prioritization decisions
 - ◆ Develop sequencing decisions at installations and FUDS, and document this development in the MAP or its equivalent
 - ◆ Document and report the prioritization and sequencing processes
 - ◆ Ensure influential information provided by stakeholders is included in the MRS's munitions response file, or Administrative Record and Information Repository, if applicable
 - ◆ Review each MRS Priority 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 making sequencing decisions



Administrative Process



Quality Assurance Process

- Each Component shall develop guidance on the QA process to ensure that the Protocol is applied appropriately and consistently across all MRSs
- The purpose of the QA process 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's priority appropriately reflects MRS conditions
 - ◆ Serve as an internal management and oversight function
 - ◆ Establish and preserve the accountability and credibility of the Protocol evaluations



Quality Assurance Process (cont)

- The QA process shall include provisions to establish a QA Panel that reviews each MRS's priority
- Each Component will establish the QA Panel of Component personnel to review, initially, all MRS prioritization decisions. Additionally, the Components shall –
 - ◆ Ensure the QA Panel is trained in the application of the Protocol and not involved in the initial scoring of a specific MRS under review
 - ◆ Ensure that stakeholders are provided an opportunity to review and comment on any changes the QA Panel recommends to the priority originally assigned to an MRS
 - ◆ Provide ODUSD(I&E) the relative priority assigned to each MRS and rationale for any change to an MRS's priority as a result of a QA Panel review



QA Panel



Documentation of Results

The Components shall –

- Ensure each installation or property documents and updates annually all aspects of the munitions responses required as well as all sequencing decisions in the MAP or its equivalent
- Be responsible for updating and maintaining an MRS's appropriate munitions response file, or Administrative Record and Information Repository, if applicable
- Report the results of the Protocol's application along with any other inventory data that 10 USC § 2710(c) requires be made publicly available to ODUSD(I&E)
- 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 ODUD(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 an MRS, where that priority has been previously 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 classified as “Evaluation Pending”



Annual Review of Prioritization Decision (cont)

- If new information justifies updating an MRS's 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's munitions response file, or Administrative Record and Information Repository, 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



Stakeholder Involvement

Each Component shall –

- Notify leaders of stakeholder organizations of the opportunity to participate in the application of the Rule and seek their involvement
- Publish an announcement in local community publications about stakeholder participation in the initial application of the Rule and request information pertinent to prioritization or sequencing
- Include a copy of all public notices and announcements in the MRS's munitions response file, or Administrative Record and Information Repository, if applicable
- Incorporate stakeholders' input in prioritization and sequencing decisions and document the decisions in the MAP
- Include information provided by stakeholders in the MRS's munitions response file, or Administrative Record and Information Repository, if applicable
- Provide stakeholders with information for prioritization and sequencing changes and request their comments

– [32 CFR § 179.5]



Promoting Involvement

- Candid two-way communication can establish trust and ensure dissemination of accurate information
- Component representatives should –
 - ◆ Involve stakeholders as early as possible and throughout the process
 - ◆ Educate stakeholders on the Protocol and its application
 - ◆ Inform stakeholders of Protocol initiatives
 - ◆ Include community organizations in event preparation (e.g., sponsor stakeholder events and meetings)
 - ◆ Request input from stakeholders in Protocol data collection efforts and application

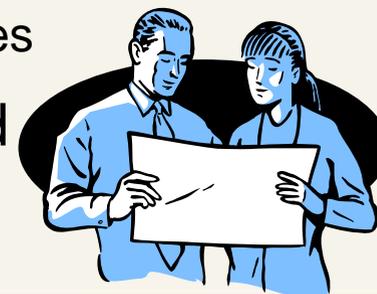


Stakeholders engaged in DoD activities



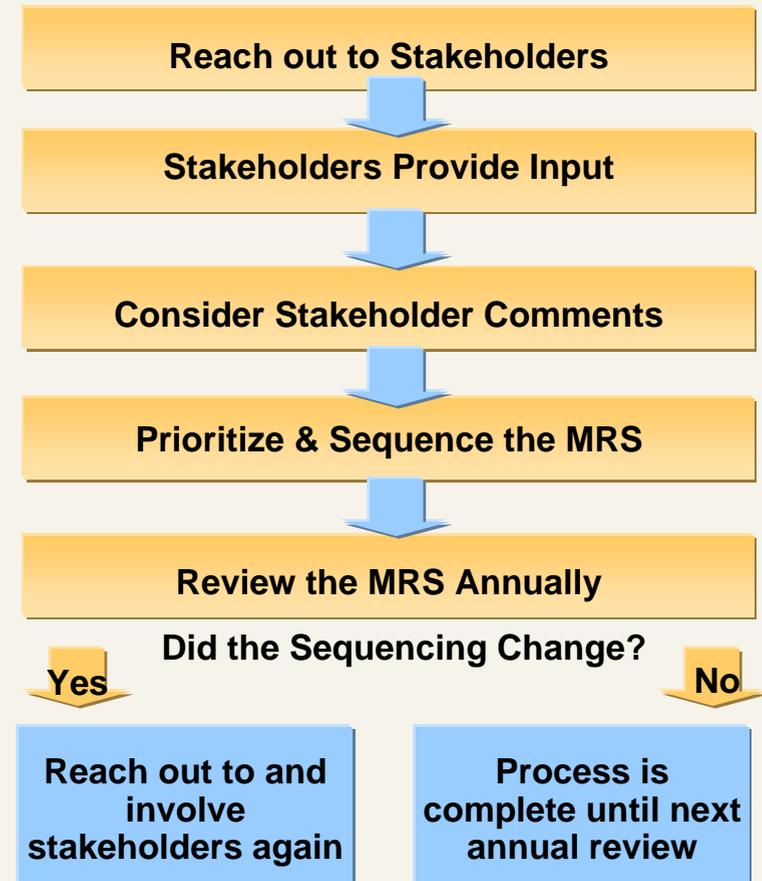
Community Relations Plan

- Each installation or property is required to have a Community Relations Plan
- The Community Relations Plan –
 - ◆ Identifies appropriate mechanisms for disseminating information to the public (e.g., media publications, public meetings, websites)
 - ◆ Contains strategies for providing opportunities for community participation
 - ◆ Identifies and considers any environmental justice issues (e.g., issues associated with minority and economically disadvantaged populations)
 - ◆ Reflects input gained through interviews with a sufficient number of persons to represent the diversity of the community
 - ◆ Provides analysis of the impacts of environmental restoration activities on the community and evaluates the degree and nature of community interest in these activities
- The Community Relations Plan should be updated to address the Protocol, as appropriate



When does Stakeholder Involvement end?

- Stakeholder involvement is a continuous process
- Each MRS's priority will be reviewed at least annually
- If the sequencing of any MRS changes during the annual review, the Component will provide stakeholders with the reason for the change and allow opportunity for review and comment
- Stakeholder involvement ends when the MRS is assigned either –
 - ◆ Prioritization no longer required
 - ◆ No known or suspected hazard



Camp Swampy Fictitious Example:

- The MRA, Camp Swampy, is located about four miles from the Gulf of Mexico. The Swampy River flows through the Camp and discharges into the Gulf
- The southern half of Camp Swampy (MRS 1C) is now a fenced-in wildlife refuge
- Lead was identified in the Swampy River within the MRS containing the wildlife refuge (MRS 1C)
- Additionally, MRS 1C was determined to be a former practice range. MEC, in the form of practice munitions, and non-explosive CWM were confirmed below the surface of the geologically active area



Table 10
Determining the EHE Module Rating

DIRECTIONS:

- From Tables 1-9, record the data element scores in the **Score** boxes to the right.
- Add the **Score** boxes for each of the three factors and record this number in the **Value** boxes to the right.
- Add the three **Value** boxes and record this number in the **EHE Module Total** box below.
- Circle the appropriate range for the **EHE Module Total** below.
- Circle the **EHE Module Rating** that corresponds to the range selected and record this value in the **EHE Module Rating** box found at the bottom of the table.

Note:
An alternative module rating may be assigned when a module letter rating is inappropriate. An alternative module rating is used when more information is needed to score one or more data elements, contamination at an MRS was previously addressed, or there is no reason to suspect contamination was ever present at an MRS.

	Source	Score	Value
Explosive Hazard Factor Data Elements			
Munitions Type	Table 1	30	38
Source of Hazard	Table 2	08	
Accessibility Factor Data Elements			
Location of Munitions	Table 3	25	38
Ease of Access	Table 4	08	
Status of Property	Table 5	05	
Receptors Factor Data Elements			
Population Density	Table 6	03	16
Population Near Hazard	Table 7	05	
Types of Activities/ Structures	Table 8	05	
Ecological and /or Cultural Resources	Table 9	03	
EHE MODULE TOTAL			92
EHE Module Total	EHE Module Rating		
92 to 100	A		
82 to 91	B		
71 to 81	C		
60 to 70	D		
48 to 59	E		
38 to 47	F		
less than 38	G		
Alternative Module Ratings	Evaluation Pending		
	No Longer Required		
	No Known or Suspected Explosive Hazard		
EHE MODULE RATING	A		

After completing the EHE Module, we determined that the Camp Swampy MRS had a module total of 92 and an EHE Module Rating of A

Table 20
Determining the CHE Module Rating

	Source	Score	Value	
<p>DIRECTIONS:</p> <ol style="list-style-type: none"> From Tables 11-19, record the data element scores in the Score boxes to the right. Add the Score boxes for each of the three factors and record this number in the Value boxes to the right. Add the three Value boxes and record this number in the CHE Module Total box below. Circle the appropriate range for the CHE Module Total below. Circle the CHE Module Rating that corresponds to the range selected and record this value in the CHE Module Rating box found at the bottom of the table. <p>Note: An alternative module rating may be assigned when a module letter rating is inappropriate. An alternative module rating is used when more information is needed to score one or more data elements, contamination at an MRS was previously addressed, or there is no reason to suspect contamination was ever present at an MRS.</p>	CWM Hazard Factor Data Elements			
	CWM Configuration	Table 11	30	40
	Sources of CWM	Table 12	10	
	Accessibility Factor Data Elements			
	Location of CWM	Table 13	05	18
	Ease of Access	Table 14	08	
	Status of Property	Table 15	05	
	Receptors Factor Data Elements			
	Population Density	Table 16	03	16
	Population Near Hazard	Table 17	05	
	Types of Activities/ Structures	Table 18	05	
	Ecological and /or Cultural Resources	Table 19	03	
	CHE MODULE TOTAL			74
	CHE Module Total	CHE Module Rating		
	92 to 100	A		
	82 to 91	B		
	71 to 81	C		
	60 to 70	D		
	48 to 59	E		
	38 to 47	F		
less than 38	G			
Alternative Module Ratings	Evaluation Pending			
	No Longer Required			
	No Known or Suspected CWM Hazard			
CHE MODULE RATING	C			

After completing the CHE Module, we determined that Camp Swampy MRS had a module total of 74 and an CHE Module Rating of C

Table 28
Determining the HHE Module Rating

DIRECTIONS:

1. Record the letter values (H, M, L) for the **Contaminant Hazard, Migration Pathway, and Receptor Factors** for the media (from Tables 21-26) in the corresponding boxes below.
2. Record the media's 3-letter combinations in the **3-Letter Combination** boxes below (3-letter combinations are arranged from Hs to Ms to Ls).
3. Using the reference provided below, determine each media's rating (A–G) and record the letter in the corresponding **Media Rating** box below.

Media (Source)	Contaminant Hazard Factor Value	Migratory Pathway Factor Value	Receptor Factor Value	3-Letter Combination (Hs-Ms-Ls)	Media Rating (A-G)
Groundwater (Table 21)					
Surface Water/Human Endpoint (Table 22)					
Sediment/Human Endpoint (Table 23)					
Surface Water/Ecological Endpoint (Table 24)					
Sediment/Ecological Endpoint (Table 25)	H	H	M	HHM	B
Surface Soil (Table 26)					

DIRECTIONS (cont.):

4. Select the single highest Media Rating (A is highest; G is lowest) and enter the letter in the **HHE Module Rating** box below.

Note:

An alternative module rating may be assigned when a module letter rating is inappropriate. An alternative module rating is used when more information is needed to score one or more media, contamination at an MRS was previously addressed, or there is no reason to suspect contamination was ever present at an MRS.

HHE MODULE RATING

B

HHE Ratings (for reference only)

Combination	Rating
HHH	A
HHM	B
HHL	C
HMM	
HML	D
MMM	
HLL	E
MML	
MLL	F
LLL	G

Alternative Module Ratings

Evaluation Pending

No Longer Required

No Known or Suspected MC Hazard

After completing the HHE Module, we determined that Camp Swampy MRS had the values HHM, with an HHE Module Rating of B

Camp Swampy Fictitious MRS Priority

Table 29
MRS Priority

DIRECTIONS: In the chart below, circle the letter **rating** for each module recorded in Table 10 (EHE), Table 20 (CHE), and Table 28 (HHE). Circle the corresponding numerical **priority** for each module. If information to determine the module rating is not available, choose the appropriate alternative module rating. The MRS priority is the single highest priority; record this number in the **MRS or Alternative Priority** box at the bottom of the table.

Note: An MRS assigned Priority 1 has the highest relative priority; an MRS assigned Priority 8 has the lowest relative priority. Only an MRS with CWM known or suspected to be present can be assigned Priority 1; an MRS that has CWM known or suspected to be present cannot be assigned Priority 8.

EHE Rating	Priority	CHE Rating	Priority	HHE Rating	Priority
		A	1		
A	2	B	2	A	2
B	3	C	3	B	3
C	4	D	4	C	4
D	5	E	5	D	5
E	6	F	6	E	6
F	7	G	7	F	7
G	8			G	8
Evaluation Pending		Evaluation Pending		Evaluation Pending	
No Longer Required		No Longer Required		No Longer Required	
No Known or Suspected Explosive Hazard		No Known or Suspected CWM Hazard		No Known or Suspected MC Hazard	
MRS or ALTERNATIVE PRIORITY					

Table 29 compares the ratings and priorities based on the three individual modules

How should we complete Table 29?



Camp Swampy Fictitious MRS Priority

Table 29
MRS Priority

DIRECTIONS: In the chart below, circle the letter **rating** for each module recorded in Table 10 (EHE), Table 20 (CHE), and Table 28 (HHE). Circle the corresponding numerical **priority** for each module. If information to determine the module rating is not available, choose the appropriate alternative module rating. The MRS priority is the single highest priority; record this number in the **MRS or Alternative Priority** box at the bottom of the table.

Note: An MRS assigned Priority 1 has the highest relative priority; an MRS assigned Priority 8 has the lowest relative priority. Only an MRS with CWM known or suspected to be present can be assigned Priority 1; an MRS that has CWM known or suspected to be present cannot be assigned Priority 8.

EHE Rating	Priority	CHE Rating	Priority	HHE Rating	Priority
A	2	C	3	B	3
B	3	D	4	C	4
C	4	E	5	D	5
D	5	F	6	E	6
E	6	G	7	F	7
F	7			G	8
G	8				
Evaluation Pending		Evaluation Pending		Evaluation Pending	
No Longer Required		No Longer Required		No Longer Required	
No Known or Suspected Explosive Hazard		No Known or Suspected CWM Hazard		No Known or Suspected MC Hazard	
MRS or ALTERNATIVE PRIORITY				2	

Table 29 compares the ratings and priorities based on the three individual modules

The MRS received an A rating (Priority 2) in the EHE Module

The MRS received a C rating (Priority 3) in the CHE Module

The MRS received a B rating (Priority 3) in the HHE Module

The highest priority for the MRS is a 2; therefore, the MRS Priority is a 2

