

CHAPTER 3 TYPES OF ESS's

3-1. Introduction.

a. This chapter discusses the four types of ESSs. The four types are listed below and are described in more detail in the following sections.

(1) An ESS prepared as part of a response action when the recommended response alternative in the decision document is the physical removal of conventional OE.

(2) An ESS prepared as part of a response action when the recommended response alternative in the decision document is Institutional/Engineering Controls.

(3) An ESS prepared as part of a response action when the recommended response alternative in the decision document is NDAI. Once a site has been listed on the DOD's munitions response inventory, it cannot proceed to a NDAI without an ESS, regardless of the response phase completed.

(4) An ESS prepared for a Time Critical Removal Action (TCRA).

b. Depending on the circumstances at a site, different identified OE areas may not be included in the same ESS. If this is the case, the ESS will identify the other areas and explain why they were not included (e.g., the other areas were covered in a previous ESS or will be covered in a future ESS). In the event that an ESS had been previously approved for a different OE area at a site, then the previously approved ESS will be referenced in the new ESS.

3-2. Removal Action ESS.

a. This type of ESS is prepared as part of the removal design phase of a response action when the recommended response alternative in the decision document involves the physical removal of conventional OE.

b. The ESS must be approved prior to the initiation of intrusive operations.

EP 385-1-95b
28 Mar 03

c. The format for a removal action ESS is described in the Department of Defense Explosive Safety Board's (DDESB's) "Memorandum Guidance for Clearance Plans", dated January 1998. This memorandum may also be found on the U.S. Army Technical Center for Explosive Safety's (USATCES') website at <http://www.dac.army.mil/es/documents/esslist.pdf>. Additional information on this type of ESS is provided in the OE Mandatory Center of Expertise's (MCX's) Data Item Description (DID) OE-060, "Conventional Explosives Safety Submission", which is located on the OE MCX website at <http://www.hnd.usace.army.mil/oew/dids.asp>.

d. The ESS will include a description of the Recurring Review Plan as presented in the EE/CA report.

e. The ESS will describe the type of engineering controls that will be used during the removal action, if applicable. An engineering control is any process or device designed to reduce the blast or fragmentation effects of an OE detonation. Engineering controls may be used to reduce the Minimum Separation Distances (safe separation distances) for removal actions.

(1) Engineering controls may be used as needed with prior approval from DDESB at any USACE project. The OE Design Center will review any application of an approved engineering control to assure proper utilization at the specific site. This site-specific application will be described in the ESS. The technical data package and DDESB approval must be maintained on site during the application of the engineering control.

(2) An engineering control may be submitted without prior approval by DDESB as part of the ESS for DDESB approval, but will only be approved for that specific site and the specific application(s) described in the ESS.

(3) "Prior approval" as used here means a separate (not site-specific) report describing the design, testing, and capabilities of an engineering control was developed, sent through explosives safety channels for review and concurrence, and was ultimately approved by DDESB for general application. Example engineering controls applications can be found on the OE MCX website at http://www.hnd.usace.army.mil/oew/tech/analytical_tools/analindx.htm.

3-3. Institutional/Engineering Controls ESS.

a. This type of ESS is prepared upon finalization of the decision document that identifies Institutional/Engineering Controls as the recommended response alternative for an OE site.

b. The ESS is submitted for approval after the approval of the decision document.

c. The format for an Institutional/Engineering Controls ESS is provided in Appendix B. Because UXO is not being removed, several sections required for a removal action ESS are not applicable to the Institutional/Engineering Controls ESS.

3-4. NDAI ESS.

a. This type of ESS is prepared upon finalization of a decision document that identifies NDAI as the recommended response alternative for an OE site. The ESS is prepared after the public comment period has been held on the decision document and any comments received as a result of the public comment period have been addressed in the decision document.

b. The ESS is submitted for approval after the decision document has been approved.

c. The format for a NDAI ESS is provided in Appendix C. Because UXO is not being removed, several sections required for a removal action ESS are not applicable to the NDAI ESS.

3-5. TCRA ESS.

a. A TCRA may be required to respond to an imminent danger posed by OE hazards at a site, such that cleanup or stabilization actions must be initiated within six months to reduce the risk to public health or the environment. The increased urgency of a TCRA requires an ESS process, which is described below.

b. The format for a TCRA ESS is provided in Appendix D.

c. A TCRA will not proceed to a NDAI status without a Site Specific Final Report that addresses all items required in a NTCRA ESS and justifies the NDAI. Site Specific Final Reports will be reviewed and approved in accordance with the requirements for a NTCRA ESS.