

APPENDIX B

Chemical Event Reporting



DEPARTMENT OF THE ARMY  
U.S. ARMY CORPS OF ENGINEERS  
WASHINGTON, D.C. 20314-1000

REPLY TO  
ATTENTION OF:

CEMP-CE (200-1a)

23 Apr 2004

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Interim Guidance - Notification Procedures for Discovery of Recovered  
Chemical Warfare Materiel (RCWM) During USACE Projects

1. The enclosed subject Interim Guidance provides a summary of the notification requirements when suspected RCWM (with known or unknown fillers – herein called RCWM) are discovered. This guidance shall be distributed to all military munitions response and construction project teams for incorporation into future site health and safety plans. Existing site health and safety plans will be reviewed to comply with these requirements.
2. This guidance supersedes any prior USACE guidance on the subject. This guidance only addresses RCWM discovery notification procedures. It does not address notification requirements of other regulations for chemical release, accidents or incidents.
3. Questions regarding RCWM notification requirements should be directed to Ms. Toni Hamley of the CEHNC-OE-CX office at (256) 895-1761, or Ms. Blanca Roberts of the CESO-E office at (202) 761-4989.

FOR THE COMMANDER:

Encl

A handwritten signature in cursive script that reads "Patricia A. Rivers".

PATRICIA A. RIVERS  
Chief, Environmental  
Community of Practice  
Directorate of Military Programs

CEMP-CE (200-1a)

SUBJECT: Interim Guidance - Notification Procedures for Discovery of Recovered Chemical Warfare Materiel (RCWM) During USACE Projects

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30 Nov 04

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(CEHNC-OE)

COMMANDER, U.S. ARMY CORPS OF ENGINEERS HTRW CENTER OF EXPERTISE  
(CENWO-HX)

CESO

CECW-E

CEMP-CE (200-1a)  
23 Apr 2004

**USACE Interim Guidance**  
**Notification Procedures for Discovery of Recovered Chemical Warfare**  
**Materiel (RCWM) During USACE Projects**

1. **Purpose.** To provide interim guidance procedures for notification of RCWM discoveries during execution of USACE projects.

2. **Applicability.** This interim guidance applies to all USACE commands having responsibilities for munitions response action and construction projects.

3. **References.**

- a. EP 75-1-3, Recovered Chemical Warfare Materiel (RCWM) Response
- b. AR 50-6. Chemical Surety
- c. AR 360-1. The Army Public Affairs Program
- d. EP 75-1-2. Unexploded Ordnance (UXO) Support During Hazardous, Toxic, and Radioactive Waste (HTRW) and Construction Activities

4. **Background.**

- a. This Interim Guidance provides procedures to ensure the timely notification (AR 50-6, Chapter 11) of discovered RCWM.
- b. USACE will report any discovery of RCWM at the projects it manages and/or executes:
  - 1) For planned RCWM activities. The notification (see attached RCWM Notification Format) procedures will be addressed in the workplan (WP). At a minimum, it will include: (a) Project specific agencies and/or organizations receiving the report, (b) Reporting chain-of-command, (c) Initial telephonic notification within 3 hrs of discovery, (d) Written notification within 24 hrs of discovery, and (e) Follow up written notifications the first working day of each quarter, if changes to prior written reports occur or upon report closeout or suspension of operations.
  - 2) For unplanned RCWM activities. Follow the procedures specified in paragraphs 4.c and 5, below.
- c. Upon an unexpected discovery of RCWM, all work will immediately cease. Project personnel will withdraw along cleared path upwind from the discovery. A team, consisting of a minimum

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Notification Procedures for Discovery of Recovered Chemical Warfare Materiel (RCWM)  
During USACE Projects (page 2 of 4)

of two personnel, will secure the area to prevent unauthorized access. Personnel must position themselves as far upwind as possible while still maintaining visual security of the area.

5. **Requirements/Procedures.** The following requirements/procedures apply to RCWM notifications and are for inclusion in the notification section of the project WP, as applicable. The attached RCWM Notification Format shall be used as a guide for both, telephonic and written notification. Provide as much information as is available at the time of report.

**a. Projects managed and executed by USACE (e.g., FUDS sites).**

1) Immediately after RCWM discovery, the UXO/HTRW/Construction team (or on-site USACE project team) will follow paragraph 4.c and notify the local point of contact (POC) as designated in the WP. The local POC will contact and facilitate Explosive Ordnance Disposal (EOD) response. If the local POC is not the local law enforcement agent, he/she will notify the local enforcement agency of the discovery, which will contact EOD. Simultaneously, the UXO/HTRW/Construction team (or on-site USACE project team) will notify the Chemical Warfare Design Center (OE-CW) at USAESCH by calling the 24/7 telephone number at 256-895-1180 (Email: [Wilson.C.Walters@hmd01.usace.army.mil](mailto:Wilson.C.Walters@hmd01.usace.army.mil)).

2) Within three hours of discovery, the OE-CW will (in coordination with the on-site USACE project team), notify the Army Operation Center, the Director of Army Safety and HQ USACE (USACE Operation Center, Safety and Environmental offices). After telephonic notification or as soon as additional information becomes available but not later than 24 hrs, the OE-CW will follow-up with written notification to offices above and those in AR 50-6, paragraph 11-3(7)(a). Status report will be required until the disposition of the item, see paragraph 5.a.5. Close out reports are required after final disposition of the item. The UXO/HTRW/Construction team (or on-site USACE project team) will also inform the project chain of Command, including its Public Affairs Office (PAO) within the same time limits stated above.

3) The UXO/HTRW/Construction Team with support from the PAO (or through the PAO) will notify State/local government officials and the local Congressional office before news releases to the general public if at all possible. If the attempt to notify the Congressional office is unsuccessful, state this fact in the chemical event report, and make the news release (see paragraph 5.a.4). In cases where health and safety reasons preclude prior Congressional notification, the news release and local Congressional notification may occur simultaneously.

4) The District Commander (in consultation with his/her staff) will authorize release of information to the media regarding RCWM discoveries. Prior to the initial release of information, the information will be coordinated with the Army Office of the Chief of Public Affairs (OCA) through the chain of Command. This applies to all Army agencies, contractors, subcontractors, vendors, and suppliers. Releasing of new information on chemical munitions may become an item of national interest. Such information must be cleared through the Office of the Assistant Secretary of Defense for Public Affairs (OASD (PA)) by the OCA (ref 3.c).

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5) The UXO/HTRW/Construction team (or on-site USACE project team) will provide periodic status of the RCWM to the OE-CW. The OE-CW will provide status report the first working day of each month to offices on paragraph 5.a.2). Status reports are required when there are changes to prior written notifications (e.g., a) to confirm the item's identification as RCWM, b) to advise that it was determined not to be RCWM, c) to inform the item movement to storage, transport off-site for disposition, or demilitarization on-site, d) to inform of suspension of operations or upon project closeout). The EOD/TEU is also responsible for providing status reports thru their chain-of-command once they have custody of the item.

6) To ensure the notification has been accomplished, the on-site USACE project team will perform quality assurance check to ensure the notification was done. This quality assurance check could be feedback from the OE-CW and vice versa. Copies of the chemical event report shall be submitted to the Project Team for inclusion in the project administrative file.

**b. Project executed for Active/BRAC installations.**

1) The UXO/HTRW/Construction team (or on-site USACE project team) will notify the installation POC who will follow paragraph 4.c and notify the installation Range Control Officer, Facility Engineer, Post Headquarters, BRAC Environmental Coordinator (BEC) and others as designated in the WP. The installation POC will provide prompt information to the Commander for his/her notification. Per AR 50-6, Chapter 11-3, the installation Commander (or his/her designee) is responsible for making the chemical event report.

2) The installation Commander should follow their own established procedures for notification IAW AR 50-6 and AR 360-1.

3) The on-site USACE project team shall provide quality assurance check on the notification, verifying the telephonic notification was made and by requesting a copy of the written notification. The USACE project team shall document notification efforts in the project administrative file.

4) To ensure that UXO/HTRW/Construction team (or on-site USACE project team) keeps the USAESCH informed, the UXO/HTRW/Construction team (or on-site USACE project team) will notify the OE-CW of the discovery and actions taken by calling the 24/7 telephone number at 256-895-1180 (Email: Wilson.C.Walters@hnd01.usace.army.mil).

5) If USACE is responsible for the installation notification (per agreement or negotiation), then the UXO/HTRW/Construction team (or the on-site USACE project team) will contact and facilitate the closest Army EOD unit (unless USACE has an agreement with other services EOD or by the installation service EOD unit). The EOD unit will notify the Technical Escort Unit (TEU) after their assessment of the item, if required. If the item is a suspect RCWM, the BRAC/Installation will secure the item until TEU arrives. The UXO/HTRW/Construction team (or on-site USACE project team) will also notify the OE-CW by calling the 24/7 telephone

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Notification Procedures for Discovery of Recovered Chemical Warfare Materiel (RCWM)  
During USACE Projects (page 4 of 4)

number at 256-895-1180 (Email: Wilson.C.Walters@hnd01.usace.army.mil)). The UXO/HTRW/Construction team (or on-site USACE project team) will also inform the project chain of Command, including its Public Affairs office. Then follow paragraph 5.a.2)-6). The on-site USACE team will keep the installation POC informed.

**c. Projects executed for state, federal and/or local government (e.g., work for others (WFO)).**

- 1) At discovery the UXO/HTRW/Construction team (or on-site USACE project team) will notify the WFO POC who will make notification as appropriate or as required by the WP. We understand that the WFO will notify the closest local EOD enforcement unit or closest DoD EOD unit. The on-site USACE project team will provide quality assurance, ensuring an EOD unit is called-up to the site since they are the primary group to handle the materiel and follow paragraph 4.c.
- 2) The WFO POC should follow their own established procedures for notification to State/local government officials, the local Congressional office, and to the general public.
- 3) To keep the USAESCH informed, the UXO/HTRW/Construction team (or on-site USACE project team) will notify the OE-CW of the discovery and actions taken by calling the 24/7 telephone number at 256-895-1180 (Email: Wilson.C.Walters@hnd01.usace.army.mil). The USACE project team shall document notification efforts in the project administrative file.
- 4) The OE-CW will (in coordination with the on-site USACE project team) provide notification to the Army Operation Center, the Director of Army Safety and HQ USACE (USACE Operation Center, Safety and Environmental offices), within three hours of discovery. As soon as information is available regarding ownership of the item (if munitions, it belongs to DOD), the OE-CW will provide status and follow paragraph 5.a. or b, and the WFO WP as applicable.
- 5) If USACE is responsible for the WFO notification (per agreement or negotiation), then follow paragraph 5.a, and the agreement requirements, as applicable. The on-site USACE team will keep the WFO POC informed.