

## DoD Releases MPPEH Manual - DODM 4140.722

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Related Categories: Policies, Regulations, and Laws

**Washington, D.C.** DoD released a policy manual on the management of Material Potentially Presenting An Explosive Hazard (MPPEH). The manual expands upon previously issued polices regarding MPPEH by going into more specific detail as to how MPPEH should be managed at DoD sites. The manual starts off with an expanded definition of MPPEH into five broad categories including 1) munitions and munitions debris, 2) range-related debris, 3) munitions containers and packaging, 4) munitions-related facilities and associated equipment, and 5) other debris.

The manual includes a section on munitions used for training or display which requires these items to be certified as Material Documented as Safe (MDAS) and be permanently marked as inert. In addition, the manual requires that DoD components track training or display items in an inventory management system along with the MDAS chain of custody paperwork.

Methods for determining the explosives safety status explained in the manual include: visual inspections, DDESB-approved processing methods, and the application of expert knowledge. The manual provides separate language for the 1348 specific to the type of method utilized.

The manual re-iterates that MDAS certification is accomplished by two independent signatures from qualified personnel who must be "designated in writing by the responsible authority (e.g., installation commander) as technically qualified and authorized to determine the material's explosives safety status." Prior to this manual, only the Navy required personnel to be designated in writing. The manual also states that "certifications must indicate the specific categories of MPPEH that each individual may document as MDEH or MDAS."

In order to prevent or minimize the potential for munition constituents to be released to the environment the manual requires the DoD Components to "limit the amount of time MPPEH, MDEH, and MDAS are accumulated or retained at a location: during its management and processing activities. The manual also suggests the use of non-permeable surfaces (e.g., paving, concrete slab) with drainage to storm water management systems for MPPEH processing areas and covering MPPEH (or using closed containers) to prevent exposure to precipitation and weathering.

The manual requires MPPEH processing areas to be explosively sited in accordance with explosive safety regulations which includes a DDESB-approved explosives site plan (ESP).

From a personnel perspective, it appears that the DDESB 1348s must be signed by UXO Technicians III or higher as the manual specifically states "Individuals documenting the explosives safety status of munitions or range-related debris from range clearance activities require extensive formal training and levels of experience commensurate with DDESB TP 18 UXO Technician III qualification."

Unauthorized transfers or releases are covered in the manual to include the requirement for DoD Components to investigate and implement appropriate corrective actions for such releases and report such transfers or releases to their chain of command. For unauthorized releases that are a result of contractor actions are reported to the contracting officer's representative.

The new requirements in the manual including the ones summarized above will certainly impact the UXO industry.

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