

Handling Impacted Range Material on Fort Leonard Wood (FLW)

Environmental Management Bulletin

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The Environmental Protection Agency's (EPA) Military Munitions Rule 266.202(c)(1) states the following:

"A used or fired military munitions are a solid waste when transported off range or from the site of use, where the site is not a range, for the purposes of storage, reclamation, treatment, disposal, or treatment prior to disposal; or recovered, collected, and then disposed of by burial, or land filling either on or off range."

On FLW, all live fire ranges, firing lines and impact areas, are now considered to be part of one range complex. This allows for more flexibility in handling impacted range material (sand, soil, rock, vegetation, timber, concrete) under the EPA's Military Munitions Rule. Now, impacted range material from one FLW firing activity area may be used at another FLW firing activity area without first testing the material for hazardous constituents, with the following exceptions:

1. Impacted range material shall be used *for range maintenance purposes only*; specifically, the material shall not be transported off its original site for the purposes of storing or disposing of the removed material.
2. Range material from impact areas shall not be used in firing lines; range material may be moved from firing lines to impact areas and between impact areas only.
3. Surface danger zones are not considered part of the range complex for the purposes of the EPA's Military Munitions Rule. Although munitions may fall in the surface danger zones, the concentration of munitions found there is much less than the concentrations found in the impact areas. For this reason, material may not be taken from the firing lines or the impact areas for use in a surface danger zone.
4. As the range complex is defined by the EPA's Military Munitions Rule, the definition applies only when making a *hazardous waste determination* for material being removed from one firing activity area to another firing activity area on FLW; this definition may not be used for other range activities without prior written approval from the FLW Directorate of Public Works (DPW) Environmental Division.
5. For the purpose of transporting material from one FLW firing activity area to another FLW firing activity area, roads with hardened surfaces, such as asphalt, may be used provided that connecting roads between firing activity areas cannot be accessed, are deemed unsafe, or are nonexistent. To decrease the possibility of spillage, range personnel shall monitor loading to ensure over loading does not occur. Furthermore, when transporting impacted range material, the material must be immediately delivered to the receiving FLW firing activity area.



Fort Leonard Wood Directorate of Public Works Environmental Branch

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6. All range materials being transported on paved or off-range roads must have a Non-Tactical Vehicle (NTV) escort to monitor for spillage. All spilled range materials must be cleaned up immediately. The NTV escort must have communication with the transport vehicle to stop further movement and spillage. If there is the loss of range material while transporting on the paved or off-range roads, all operations will come to a halt until the spilled material has been fully recovered. Recovered material shall include, but is not limited to, (sand, soil, rock, vegetation, timbers, concrete), expended rounds, live ammunition, unexploded ordnance, and detonated ordnance. Transport and escort personnel will immediately recover spilled range materials and place into the transport vehicle.
7. Sediment control measures must be installed and maintained so that sediment does not leave the site.
8. It is the responsibility of Range Control personnel to recover, to the fullest extent possible, any material lost during transport and to oversee all requirements.
9. For more information on the EPA Military Munitions Rule and the information contained in this Environmental Management Bulletin, please contact the FLW DPW Environmental Division at 573-596-0882.