USAG Italy

EXPLOSIVES SAFETY MANAGEMENT PROGRAM (ESMP)

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1. PURPOSE

- a. This document establishes and implements the Explosives Safety Management Program (ESMP) for United States Army Garrison (USAG) Italy. This policy complies with the requirements outlined in Department of Defense (DoD) Directive 6055.9E, DoD Instruction 6055.16, Defense Explosives Safety Regulation (DESR) 6055.09, Army Regulation (AR) 385–10, Department of Army Pamphlet (DA Pam) 385-64, DA Pam 385-65, AER 385-64, Explosives Safety TP-26 Site Planning, and PASA MOA effective 20 November 2020.
- b. This ESMP identifies the roles and responsibilities of all organizations with an Ammunition and Explosives (A&E) mission in USAG Italy's Area of Responsibility (AOR) including any service components, contractors, installation, and/or tenant activities.
- c. It provides the policy and framework for addressing the sixteen elements (organization and staffing, site planning, facilities conformance, emergency response, tenants, master planning, ranges, contractors, accident prevention program, facility maintenance, demilitarization/ destruction, risk management, explosives safety issuances, records management, inspections/evaluations/audits and training) required by the Army and DoD.

2. POLICY

- a. USAG Italy's facilities and operations involving A&E must comply with the requirements of all applicable Federal, DoD, and Army Regulations, and this plan. The following minimum requirements shall govern explosives facilities and A&E operations at USAG Italy.
- (1) Perform all conventional and chemical A&E Commander duties required by AR 385-10 and DA Pam 385-64.
 - (2) Establish and implement an ESMP.
- (3) Ensure that personnel receives explosives safety training as required by Army policy and standards, and contracts include appropriate explosives safety training requirements.
- (4) Conduct periodic reviews, inspections, and audits to ensure compliance with the ESMP and implement risk mitigation measures.
- (5) Unless prohibited by law or regulation, delegate authority to others to conduct duties as deemed appropriate.
- b. It is the Garrison Commander's policy to follow the cardinal rule of explosives safety: limit the exposure to a minimum number of personnel, for a minimum amount of time, to a minimum amount of A&E consistent with safe and efficient operations.

3. APPLICABILITY

The provisions of this ESMP apply to all units, activities, and tenants that have operations and activities involving the handling, storage, shipping, receiving, and/or disposal of A&E.

NOTE: Throughout this ESMP, A&E will mean not only conventional ammunition but also nonstandard A&E, commercial A&E, chemical agent A&E, ordnance, and explosives clean-up operations when and where appropriate.

4. ROLES AND RESPONSIBILITIES

- a. Tenants/Organizations with an A&E mission in USAG Italy's AOR will:
 - (1) Comply with this ESMP.
- (2) Establish a Standard Operating Procedure (SOP) in compliance with AR 385 10, DA Pam 385 64, or service component command directive.
 - b. Managers/Supervisors operating an A&E mission in USAG Italy's AOR will:
- (1) Ensure personnel receive and document explosives safety training as required by DoD, Army, and/or service component command policy and standards.
- (2) Ensure A&E contracts include appropriate explosives safety training requirements.
- (3) Every effort will be taken to remove excess, unwanted, unneeded, or unknown A&E inventory from storage. Each organization will have a surveillance program IAW Supply Bulletin (SB) 742-1 and AR 702-6 to ensure the safety of A&E in storage.
- (4) Participate in the USAG Italy Explosives Safety Council (ESC) and/or Explosive Safety Working Group (ESWG).
- (5) Coordinate with USAG Italy Safety Office in the preparation of A&E safety site plans. Obtain higher HQ or component command concurrence of A&E safety site plans before submitting them to Garrison Safety Office for review and concurrence.
- (6) Maintain the proper fire and chemical hazard symbols of A&E present within A&E facilities and notify USAG Italy Fire Department and Safety Office when those hazards change, unless specifically authorized not to do so due to, for example, security concerns.
 - (7) Ensure periodic inspection, testing, and documentation is maintained on all

A&E facilities IAW DA Pam 385-64 (such as lightning protection systems (LPSs)).

- (8) Conduct periodic inspections and/or audits of A&E activities to ensure compliance with the activity SOP and DA Pam 385 64, including compliance with the Hazards of Electromagnetic Radiation to Ordnance (HERO) requirements.
- (9) Ensure SOPs are properly staffed and approved before starting operations, and that no deviations are allowed without proper review and final approval.
- (10) Coordinate with USAG Italy Garrison Safety Office for an explosives license review for every separate A&E operating and storage location within the USAG Italy AOR.
- (11) Submit a DARAD, approved at the appropriate level IAW USAG Italy Risk Management Policy and DA Pam 385-30, in the event DoD and Army explosives safety policies cannot be met.
 - (12) Participate as required in A&E inspections and evaluations.
- (13) Report, investigate, and analyze all A&E mishaps with the Army Safety Management Information System 2.0 (ASMIS 2.0).
- (14) Perform all operations with approved Explosives Safety Site Plans (ESSPs), licenses, and DARADs.
- (15) Use facilities approved for A&E storage and operations according to their approved purposes.
- (16) Before hazardous operations begin, prepare a Deliberate Risk Assessment Worksheet (DD form 2977) or equivalent signed by the appropriate authority level IAW ATP 5-19.
- (17) Verify all operating personnel working with A&E are trained, certified, and familiar with ATP 4-35.1, Techniques for Munitions-Handlers.
- (18) Ensure all required tools and equipment are on hand and in serviceable condition for ammunition operations.
- (19) Provide appropriate Personal Protective Equipment (PPE), ensure personnel are trained in its proper use, maintenance, cleaning, and personnel are using PPE where required.
 - c. The USAG Italy Explosives Safety Representative will:
- (1) Serve as the POC for all ESMP related actions and is the POC for the Installation Safety Office.

- (2) Identify requirements, and assist with the preparation, coordination, and review/approval of explosives licenses, A&E safety site plans, safety submissions, SOPs, and A&E safety deviations for the organization.
- (3) Ensure all USAG Italy Potential Explosion Sites (PESs) and Exposed Sites (ESs) are covered by a DoD and Army-approved A&E ESSP and are properly depicted on the Installation Master Plan.
- (4) Ensure plans and construction designs for explosives, chemical agents, or ordnance clean up, manufacture, testing, storage, surveillance, maintenance, response actions, demilitarization, and disposal facilities are properly reviewed for compliance with safety standards, by appropriate experienced personnel.
- (5) Ensure safety inspections are conducted and documented at least semiannually for all areas where A&E-related activities (for example, production, handling, use, maintenance, munitions response, demilitarization, and disposal) routinely occur. Maintain a list of all such areas and records of inspections. Static storage and Arms Rooms will be inspected annually.
- (6) Ensure special analysis and management controls are in place for any nonstandard A&E.
- (7) Monitor A&E uploads and other A&E activities that involve the transportation, storage, and operations of A&E to verify explosives safety requirements comply to U.S. Army Standards.
- (8) Serve as the point of contact for and coordinate ESMP requirements with commanders, and provide concurrence on tenant unit or component command SOPs.
- (9) Review the USAG Italy Installation Master Plan for planned facilities construction on or near the USAG Italy ASAs both before and after construction to ensure compliance with explosives safety standards.
- (10) Review policies, SOPs, and directives for compliance with explosives safety requirements. Provide copies of SOPs to the Garrison Safety Office.
- (11) Review risk assessments, DARADs, and secretarial certifications for completeness and accuracy before forwarding for approval and yearly thereafter.
 - (12) Review explosives safety licenses annually.
- (13) Maintain a list of approved A&E safety deviations and brief incoming Commanders of their existence and plans for correction.
- (14) Actively participate in the Master Planning process and annually review the Master Plan to ensure current and future operations Explosives Safety Quantity

Distance (ESQD) arcs are appropriately drawn.

- (15) Actively participate in the Master Planning process and annually review the Master Plan to ensure current and future operations Explosives Safety Quantity Distance (ESQD) arcs are appropriately drawn.
- (16) Develop a plan to address the adequacy of Lighting Protection Systems (LPS) IAW the Memorandum, Office of the Assistant Secretary of the Army, Installations, Energy and Environment Defining Adequate Lightning Protection Systems for U.S. Army Ammunition and Explosives Facilities (Munitions Operating Facilities).
- (17) Maintain a listing of all Emergency Services POCs to include Provost Marshall, Military Police, and Fire and Emergency Services.
- (18) Ensure the completed ESMP and Appendix A is provided to the USAREUR-AF Safety Office, IMCOM-E Safety Office, local Department of Emergency Services, and the Installation Safety Manager.
 - (19) Maintain a comprehensive list of all of ESSPs, DARADs and PESs.
 - d. Employees who are involved in A&E activities will:
 - (1) Use the PPE and protective devices provided.
- (2) Develop safe working habits by following safe practice rules and regulations to protect themselves and fellow workers from injury.
 - (3) Read, sign, and adhere to all applicable SOPs before working with A&E.
 - (4) Properly secure all A&E loads when transporting munitions.
- (5) Stop any operation that will cause or is likely to cause death or serious injury or property damage. Immediately notify a supervisor or safety specialist for further guidance. Do not proceed with any A&E operation that cannot be performed safely.
 - (6) Notify supervisor of all safety deficiencies.
 - (7) Do Not engage in any operations involving A&E unless certified.
- e. Contracting Officer Representatives (CORs) will:
- (1) Monitor, control, and manage contractor operations involving A&E to ensure their explosives safety posture meets, or is compatible with, the Army and mission requirements of the organization.
- (2) Coordinate with the Installation / Garrison Safety Office to perform periodic evaluations IAW DA PAM 385-64.

(3) If contractors are involved in a safety-related incident or work-related illness, ensure prompt reporting to the appropriate authority or chain of command. All incidents and work-related illnesses must be reported immediately to the supervisor. Immediately after management/supervisory personnel notifications, notify the Garrison Safety Office and the Contracting Officer.

5. CONTRACTING

- a. All contracts involving A&E will include DFARS, clause 223.370. DFARS, clause 223.370 requires the use of DoD contract safety manual and safety oversight. This clause cannot be removed without authorization from the appropriate command level. The lead contracting agency will review appropriate A&E contracts for other explosives safety requirements.
- b. In addition to the DFARS clause, all A&E contracts will require compliance with A&E safety requirements, accident reporting provisions and develop a SOP as required by DoD 6055.9, AR 385-10, DA Pam 385-64 and DoDM 4145.26M, whichever is most stringent. Use of DoDM 4145.26M in lieu of Army Safety documents/ regulations will require approval by the Commanding General (AMC).
- c. For operations monitored by Defense Contract Management Agency (DCMA), the DCMA safety representative will coordinate any A&E safety issues with the Army Sustainment Command (ASC) Safety Office.

6. MASTER PLANNING

- a. Real Property Planning:
- (1) Real Property Master Planning (RPMP) is a continual, collaborative, and integrated process, primarily performed at the installation level, reflective of mission requirements. In order to maintain this process, it is imperative that all tenants and component commands use the systems specified in AR 210-20, RPMP for Army Installations, 16 May 2005 when requesting changes or additions to the RPMP. The Senior Commander, or his/her designated representative, participates in the installation Real Property Planning Board (RPPB) to ensure that all new construction is properly sited according to explosives safety standards.
- (2) Any real property known or suspected to contain MEC (RCWM) IAW DODD 6005.09M and DA Pam 385-64 chapter 19, Unexploded Ordnance (UXO) IAW DA Pam 385-64 chapter 19, or Chemical Warfare Materiel (CWM) IAW DA Pam 385-61 will be treated and handled accordingly.
- (3) Master Planning maintains an A&E Master Plan map showing locations of A&E operations and quantity distance arcs for Pisa Ammunition

Storage Area (PASA) and Ammunition Storage Area #7 (ASA7). The maps are developed by the Installation Safety Office and the Installation Master Planning department.

- (4) The A&E Master Plan map includes the following:
- (1) A&E hazard class and division and the Net Explosives Weight (NEW) authorized at each site.
- (2) A&E safety 'clear zones' are required around each location based on ESQD criteria outlined in DA PAM 385-64.
 - (3) Primary and alternate routes for the transport of A&E through the installation.
- (4) Locations, outside of designated impact areas, authorized for the conduct of A&E operations to include on or offloading and combat aviation and ground loading.
- (5) Airfield locations designated for jettisoning or addressing hung AE and gunclearing operations will be addressed in applicable regulatory policy.
 - (6) Vehicles upload and download areas (other than at authorized firing ranges).
 - (7) A&E support facilities.
- (8) Locations of real property and facilities known or suspected to contain MEC, Material Presenting a Potential Explosives Hazard (MPPEH) and areas where a munitions response (cleanup) have been completed, but residual hazards are known or suspected to be present.
 - (9) Date the map was last validated.
- (5) The Garrison Safety Office annually documents a review of the A&E Master Plan map to monitor encroachment within ESQD and ensure required explosives safety site plans, submissions, and explosives licenses are accomplished.

a. Real Property Planning:

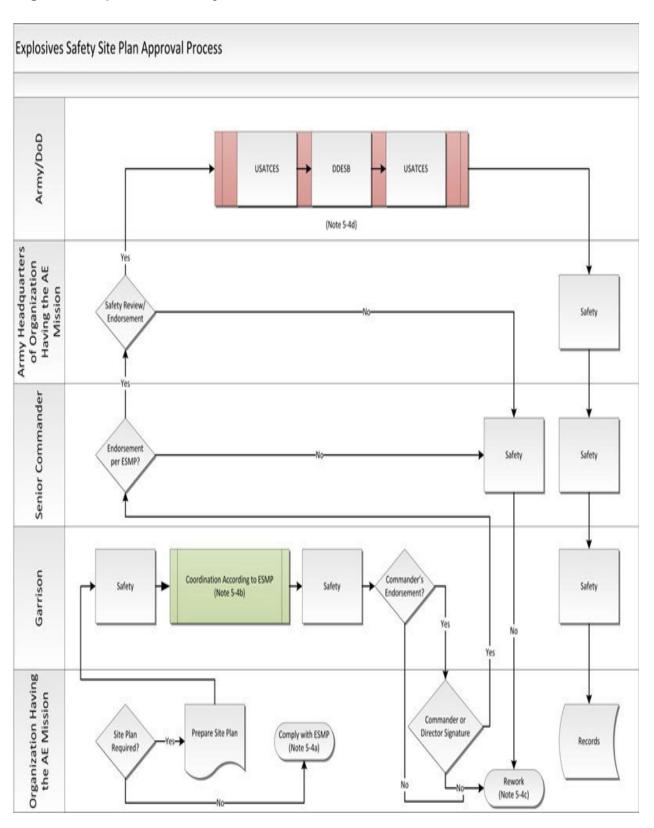
- (1) Proponents of a construction project will submit a complete construction project proposal through command channels to the U.S. Army Technical Center for Explosives Safety (USATCES) for review and approval prior obtaining approval for the construction. This review and approval requirement applies regardless of the project dollar amount or the intended facility's or structure's use. This policy applies to:
 - (a) The construction of A&E operating facilities.
- (b) Modifications of existing military munitions operating facilities that have the potential to increase explosive risk to other facilities.

- (c) Construction of non-munitions facilities (e.g., child care centers) on an installation or activity or placement of temporary structures (e.g., Intermodal containers used for storage) regardless of use, on Army installations or activities that have a military munitions mission (e.g., livefire training or testing, munitions storage, demilitarization), by the Army or other entities; or other Service installations or activities that have a military munitions-related mission.
- (2) This review and approval requirement applies to proposed construction projects for (1) tenant activities, regardless of Service or Agency, on Army installations or activities; (2) Army tenants on other Service installations or activities; and (3) other locations for which Army has explosives safety responsibilities and where DoD military munitions may be present.

7. SITE PLANNING

- a. All locations within the ESQD arcs of USAG Italy (PASA and ASA7) A&E mission must have an approved ESSP as required by DA Pam 385-64. All future ESSPs submitted will use the automated Explosives Safety Siting (ESS) Software. The US Army Technical Centerfor Explosives Safety assists in developing ESSPs.
- b. Before submission, technical issues associated with the ESSP should be discussed with the USAG Italy Garrison Safety Office, the ASC Safety Office, and USATCES which will expedite the ESSP approval process.
- c. All ESSPs will be coordinated with the USAG Italy Garrison Safety Office and routed through the command channels and MACOM Safety Office or their designees before submission to USATCES.
- d. Upon approval of an ESSP by DDESB and USATCES, the Explosives Safety Representative will ensure a copy of the approved ESSP is maintained at the Garrison Safety Office and Installation Master Planning.
- e. Every A&E operation will be conducted using an SOP. SOPs will comply with DA Pam 385-10 and will be used as a guide for the preparation of SOPs. The SOP will reflect explosives limits authorized for safe and efficient A&E operations, but in many cases will be less but never more than the maximum permitted by ESSPs and explosives licenses.

Figure 1, Explosives Safety Site Plan Flowchart



8. EXPLOSIVES SITE LICENSE

- a. All A&E facilities that store explosives must have an explosives license as required by DA Pam 385-64. A copy of the current explosives license will be posted in all A&E locations. The Installation Safety Office issues, reviews and maintains explosives licenses.
- b. Every explosives license must be reviewed annually by the Explosives Safety Representative against their approved ESSP and will provide the Installation Safety Office a memorandum stating verification of this annual review.
- c. Explosives site licenses do not have an expiration date. The license is a locally developed form following the guidelines established in DA PAM 385-64.
- d. The explosive license form will, at a minimum, contain the following information:
 - (1) The organization requesting the license.
 - (2) Ammunition or explosives area location.
- (3) Site plan file number. If authorized using a DARAD, spell out DARAD until a site plan is attained.
 - (4) The A&E facility number.
- (5) Type of facility, i.e., Earth-Covered Magazine (ECM), Above-Ground Magazine (AGM), etc.
- (6) The Hazard Class/Division (HC/D) is authorized by an approved site plan i.e., 1.1, 1.2.1, 1.3, etc.
- (7) Allowable limits of each HC/D are expressed in pounds (lbs) NEW authorized by an approved site plan or DARAD.
- (8) The determining or limiting factor limits the amount of the NEW being stored.
- (9) Actual separation distance between the facility site plan and the determining or limiting factor.
- (10) If "Z" storage compatibility is authorized for the facility, the words "Z Storage Authorized" must appear in the comment section of the explosive site license.
 - e. A signed copy of the explosive site license will be posted in each of the

licensed facilities. The license will be posted in an area as close to the entrance of the structure as possible in a conspicuous location.

f. Original licenses will be prepared by USAG Italy's Explosives Safety Representative. The final approval for a license is the USAG Italy's Garrison Commander. USAG Italy arms room and PES license signature authority is delegated to the USAG Italy Safety Director/Manager for low and medium risk.

9. FACILITIES CONFORMANCE

- a. The Explosive Safety Representative is responsible to ensure facility construction meets the requirements of approved ESSP per DA Pam 385-64.
- b. Tenants/Organizations/Activities within USAG Italy are responsible for ensuring periodic inspections of their A&E facilities and/or operations to ensure continued compliance with approved ESSP and other safety requirements. They are responsible for reporting facility non-conformances.
- c. The USAG Italy Safety Office and DPW review and release work orders for explosives safety.
- d. The USAG Italy Safety Office, or their designee, has the authority to inspect any facility and/or operation at any time.

10. FACILITIES MAINTENANCE

- a. Ensure periodic inspection and trend analysis are conducted on lightning protection systems. See DA Pam 385-64 for guidance.
- b. Army installation senior commanders; Army activity commanders, when storing A&E on an installation under the control of another Military Service; or an Army commander's designated representative who has the appropriate authority, are required to either:
- (1) Ensure the adequacy of LPS for A&E facilities requiring LPS (See Paragraph 5); or
- (2) Accept the risk associated with the waiver or exemption of LPS requirements for A&E facilities requiring LPS.
- c. Use the work order process through DPW for facility maintenance to be performed by Installation personnel/contractor.

11. RANGES

a. USAG Italy does not own or operate ranges.

b. Ranges are owned and operated by the 7th Army Training Command (ATC), Regional Training Support Division South (RTSD- South).

12. DEMILITARIZATION/DESTRUCTION

a. Methods:

- (1) Disposition of ammunition, explosives, and propellants will be accomplished by reclamation, open detonation (OD), open burning (OB), incineration, or other approved methods. Unless emergency disposition is required, resource recovery and recycling efforts will be the primary means of disposing of unwanted ammunition and explosive materials. The burying or dumping of ammunition, explosives, or propellants is not an approved method of disposal.
- (2) The Explosive Ordnance Disposal (EOD) unit assigned is designated as the installation/activity representative and operates the permitted OB/OD area.

b. Safety Precautions:

- (1) No demilitarization operation will take place without an approved SOP. The SOPs used for these types of operations will be reviewed at the local level at least annually for compliance with local laws and regulations involving demilitarization. The SOPs that are not in continuous use and have not been used within the past 6 months will be reviewed and updated before the beginning of an operation.
 - c. Site Selection for Burning or Demolition Grounds:
- (1) OB/OD operations and sites for burning of A&E shall be separated from other facilities as specified in DA PAM 385-64 paragraph 8-29.
- (2) Recurring demilitarization operations require a DDESB approved site plan or DARAD.
- (3) Burning and demolition sites. All disposal sites permitted as hazardous waste treatment facilities under 40 CFR 265.382.

13. UNEXPLODED ORDNANCE (UXO)

- a. UXO is considered the most dangerous category of military munitions. There are no safe procedures for moving, rendering safe, or destroying UXO, but merely procedures considered less dangerous. Destruction-in-place (referred to as either blow-in-place or BIP) is the least dangerous and is the preferred method of UXO destruction.
- b. Only Explosive Ordnance Disposal (EOD) will excavate, touch, move, render safe or dispose of any suspected ammunition item.

c. When a suspected UXO is discovered, it should be immediately reported to the MPs and the USAG Italy Safety Office. UXO response and reporting procedures are outlined in section 13d.

d. UXO Response Procedures:

- (1) Notification: If any UXO is located, during or after work hours, follow the "3Rs" response process: Recognize, Retreat, and Report.
- (2) Recognize that you may have found something in the form of Munitions and Explosives of Concern (MEC). Remember the general location the UXO was found.
- (3) Retreat once you have discovered the UXO. Do not touch, move or disturb the UXO and carefully leave the area, but do not run. The recommended initial withdrawal distance is 2500 feet.
- (4) Report the UXO once you are at a safe distance. Notify the authorities and provide a geographic reference such as the nearest intersection or facility number. Provide a brief description of the item, whether the area is secure, and contact information.
- (5) Notify the MPs who will in turn notify EOD and Garrison Safety. DPTMS Watch Desk will be notified if a CCIR or SIR is required.
- (6) Military police will respond to the location and assess the situation, responding to any injuries appropriately, and controlling the scene until EOD arrives.
- e. Awareness Training. UXO awareness training is required for all workers performing excavation, demolition, or any other activities that require disturbing the ground.

14. AMMUNITION AMNESTY PROGRAM

- a. Purpose: The Ammunition and Explosives (A&E) Amnesty Program is intended to ensure maximum recovery of military A&E items outside the supply system. It is not intended to circumvent normal tum-in procedures. This amnesty program must be conducted on a no-questions-asked basis to provide an opportunity for individuals to return items without fear of reprisal or prosecution.
- b. Applicability: This Policy Memorandum applies to all units assigned, attached, or tenants within USAG Italy.

c. General:

(1) USAG Italy will establish and maintain amnesty containers to support the

Installation A&E Amnesty Program in support of assigned and tenant units or activities. Four amnesty containers are located throughout Caserma Ederle/Del Din/Longare to support the Installation Amnesty Program. Containers are placed at the following locations:

- (a) Caserma Ederle, outside the motor pool gate by building 204 and DECA truck loading lot.
- (b) Caserma Ederle, adjacent to the Multi-purpose Indoor Range (MIR) Complex, Building 369.
- (c) Caserma Del Din, North Perimeter Loop, near motor pool#3 and the Weaver obstacle.
 - (d) Longare, adjacent to the military working dog obstacle course.
- (2) Amnesty containers located on Caserma Ederle, Del Din and Longare will only accept .50 caliber and smaller ball ammunition.
 - (3) Amnesty containers will be marked with contact information.
- (4) Amnesty collection containers will be checked and cleared regularly and as necessary to prevent excessive accumulation of A&E to reduce the risk to personnel. The QASAS will be responsible for checking and coordinating the clearing of the amnesty containers. They will be checked randomly and there will be no detectable pattern.
- (5) Removal and transport of items will be coordinated by the QASAS with the oversight of the ASA Manager. The QASAS will ensure coordination is conducted with, Movement Control South, Carabinieri, and the USAG Italy 3/5/7 as necessary.
- (6) The first available unit conducting an ammunition draw or turn-in should assist with Amnesty turn-in. Under special conditions when determined by the QASAS or emergency personnel that ammunition(s) within the container is incompatible, or creates a hazard, transportation will be performed by emergency vehicles under the emergency provision provided within the European Agreement Concerning the International Carriage of Dangerous Goods by Road (ADR). QASAS and ASA personnel will coordinate the removal of items and assist in the development of tasking requests to the USAG Italy 3/5/7. All units that conduct ammunition operations at ASA #7 (located in Arcugnano) are responsible for supporting the amnesty program.
- (7) Unidentifiable ammunition or explosives except for small arms type ammunition will be considered dangerous. When dangerous ammunitions or explosives are discovered personnel will contact the Military Police (MP) Desk at 118, or QASAS at DSN: 634-6867. If items are suspected or determined to be

unsafe after inspection by qualified personnel then EOD will be notified through the MP Desk and Carabinieri.

(8) Installation Operations Watch Desk will be notified if the situation meets CCIR criteria.

d. Responsibilities:

- (1) Unit Commanders:
- (a) Each unit that uses ammunition and explosives is required to implement a supplement program that supports the Installation's amnesty program. Commanders will brief all personnel on the details of this amnesty policy before each training event or exercise that requires the use of ammunition or explosives including the location of the nearest amnesty-collection container.
- (b) Develop a standard operating procedure (SOP) that establishes procedures for the amnesty collection and turn-in at local and major training areas, inspection and disposal of munitions and explosives, and training of personnel responsible for removing and transporting amnesty ammunitions and explosives.
- (c) Provide temporary amnesty-collection containers in support of weapons qualification ranges and all training events involving ammunition and explosives. Conduct brass and ammunition checks before departing training facilities involving the use of ammunitions.
- (d) Ensure properly trained personnel are available to evaluate ammunition and explosives before the movement for turn-in from training locations.
- (e) Ensure that ammunition and explosive residue generated during training exercises are turned-in properly and not deposited in installation amnesty containers or turned-in to ASA #7 under the amnesty program. Standard tum-in procedures and accountability must be followed for ammunition and explosive residue from range training events.
 - (2) USAG Italy Safety Office:
- (a) Promote the Amnesty Program through all available media sources. These sources include local Armed Forced Network (AFN) Radio/Television and e-mail distribution. Information will include amnesty program intent, procedures for reporting and disposing of A&E found on or off post, and locations of amnesty containers.
- (b) Approve locations and design of amnesty-collection containers in coordination with the Provost Marshall's Office and QASAS.
 - (3) ASA #7 QASAS:

- (a) Inspect and prepare for turn-in of ammunition.
- (b) Accept ammunition turned-in under the provisions of the A&E Amnesty Program. Individuals turning in A&E as part of the amnesty program will not be required to have a turn-in document. Units tasked to turn-in Amnesty ammunition under normal conditions will be provided transportation documents by ASA QASAS.
- (c) Submit reports to the Garrison Safety Office indicating the quantity and description of A&E turn-ins under the amnesty program when requested.
- (d) QASAS will determine the serviceability of the ammunition and take appropriate action for disposition (following regulatory requirements).
 - e. Amnesty-collection containers:
- (1) Amnesty-collection containers are placed as indicated in paragraph 14c(1). Containers will be accessible 24 hours a day.
- (2) Amnesty containers are positioned to ensure proper quantity-distances and fire safety. For safety reasons, amnesty containers in populated areas (next to inhabited buildings) are designed with an opening no larger than necessary to accept .50 caliber ammunition.
- (3) Amnesty containers are designed to prevent extraction through the deposit opening. Amnesty containers will be secured to prevent unauthorized movement.
 - f. Explosive items found outside the Installation must be reported to the MPs.

15. RISK MANAGEMENT

a. When DoD and Army explosives safety regulations and policies cannot be met, the procedures outlined in DA Pam 385-30 will be followed. Figure 15.1 gives signature authority per level of residual risk. Other Government Agencies (OGAs) and Non-Government Organizations (NGOs) operating on USAG Italy will specify an equivalent risk acceptance process in their SOP.

Figure 15-1
USAG Italy Risk Acceptance Matrix

	Duration of Risk			
	Event Waiver	Waiver		Exemption
Category of Risk	<1 month	1-12 month(s)	1-5 years	>5 years/permanent
Extremely High (EH)	IMCOM-E SES	IMCOM CG	Army HG CG	Army HG CG
High (H)	GC	IMCOM-E SES	IMCOM CG	IMCOM CG
Medium (M)	O-5/GS-13/equiv	GC/DGC/DGM	IMCOM-E SES	IMCOM-E SES
Low (L)	O-3/GS-12/equiv	O-5/GS-13/equiv	GC	GC

b. DARAD approval authority will be IAW Army requirements specified in DA

Pam 385-30. Submit all deviations from DoD and Army regulations requiring a DARAD to the Garrison Safety Office and then to USAREUR Safety office for review. Copies of approved DARADs will be submitted to USATCES as well as copies of reviews conducted on approved DARADs.

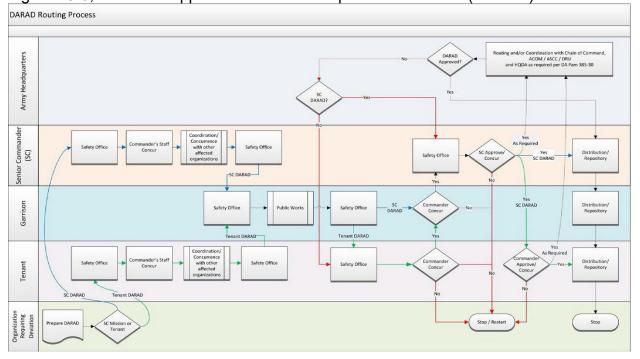
- c. The DoD and Army recognize in the referenced regulations that explosives safety deviations may be necessary at times, and when required must be documented and managed with appropriate risk management processes.
- d. All DARADs will be provided to the USAREUR-AF Safety Office within 30 days of approval to forward to USATCES.
- e. A notification of all canceled and expired DARADs will be provided to the USAREUR-AF Safety Office within 30 days of termination.
- f. Arms Room risk assessments will be accomplished using the spreadsheet in Table 15-2 and signed by the unit commander.

Figure 15-2

USAG Italy Arms Room Approval/Signature Authority

	Arms Room Risk Assessment (RA) Signature/Approval Level	Arms Room License Signature/Approval	
Residual Risk			
Extremely High (EH)	GO/SRO	SRO	
High (H)	Unit O-6	GC	
Medium (M)	Unit O-5/GS-13/equiv	USAG Italy Safety Director	
Low (L)	Unit O-3/GS-12/equiv	USAG Italy Safety Director	

Figure 15-3, Deviation Approval and Risk Acceptance Document (DARAD) Flowchart



16. ACCIDENT PREVENTION PROGRAM

- a. Explosive safety is an integral part of USAG Italy's overall accident prevention plan.
- b. The accident prevention plan will be tailored to the operation being conducted and will address the program elements required in AR 385-10, Table 1-1 and DA Pam 385-10 as a minimum.
- c. A copy of the accident prevention plan is provided to the Garrison Safety Office.

17. EMERGENCY RESPONSE

- a. USAG Italy Fire and Emergency Services (FES) conducts annual fire prevention inspections in A&E facilities and has the authority to inspect any facility at any time. A digital copy of that annual inspection will be provided to the Garrison Safety Office.
- b. All organizations with an A&E mission within the USAG Italy will maintain the proper fire and chemical hazard symbols of explosives present within the facility. In addition, the Garrison Safety Office and the Fire Department will be notified when those hazards change.
- c. In the event of an explosives accident, the Senior Fire Officer will be the Incident Commander in charge of the emergency response until the scene is declared safe. The Garrison Safety Office is part of the Incident Commanders Response Team.
- d. When notified by Department of the Army Safety, the incident scene will be turned over to the Accident Board-appointed investigation team. The appointed Accident Investigation Board (AIB) will control the site after the completion of emergency response actions.
 - e. Any release of information will go through the Public Affairs Office (PAO).

18. EMERGENCY ACTION PLAN

- a. All organizations with an A&E mission within the USAG Italy will have an Emergency Action Plan (EAP) that complies with the requirements of the United States Department of Labor Occupational Safety and Health Administration (OSHA) 29 CFR 1910. EAPs development and minimum requirements are available at the OSHA website [https://www.osha.gov/SLTC/etools/evacuation/eap.html]. Minimum requirements of the EAP will include the following six elements IAW 29 CFR 1910.38(c):
 - (1) Means of reporting fires and other emergencies.

- (2) Evacuation procedures and emergency escape route assignments.
- (3) Procedures for employees who remain to operate critical plant operations before they evacuate.
- (4) Accounting for all employees after an emergency evacuation has been completed.
 - (5) Rescue and medical duties for employees performing them.
 - (6) Names or job titles of employees who can be contacted.
 - (7) Personnel working within USAG Italy will follow the USAG Italy Installation EAP.

19. INSPECTIONS/EVALUATIONS/AUDITS

- a. All organizations with an A&E mission on USAG Italy will conduct and document periodic internal (at least annual) inspections and/or audits of A&E activities (e.g. A&E storage, packing, handling, surveillance, maintenance, demilitarization, and disposal activities) to ensure compliance with DoD and Army A&E policies. Inspection findings shall be documented and followed up to ensure the implementation and effectiveness of corrective measures. At a minimum, inspections shall address the elements required by DA Pam 385-64, of paragraph 1-9.
- b. The Explosives Safety Representative will document final A&E facilities acceptance inspections following construction, renovation, or modification of facilities before commencing any explosives operation.
- c. The results of external inspections, evaluations, audits, and surveillance efforts (HQ, IG, technical assistance, DDESB survey, or program evaluation) will be incorporated into action plans, and lessons learned will be tracked to remediate inspection deficiencies.
- d. Inspection records will be made available for review during all external program evaluations/audits.
- e. Organizations with an A&E mission within USAG Italy shall conduct periodic surveys of A&E transportation activities to evaluate the implementation of A&E transportation safety requirements. At a minimum, A&E transportation inspections shall address the elements required by DA Pam 385-64, paragraph 1-10.

20. EXPLOSIVES SAFETY ISSUANCES

a. ESMP issuances consist of, but are not limited to, local policies (SOPs), ARs, pamphlets, and other publications. All organizations with an A&E mission within USAG Italy will have a safety policy and SOPs which include A&E safetymanagement.

- b. All organizations with an A&E mission will review SOPs on a bi-annual basis. The originating organization will obtain appropriate professional safety support for review and concurrence of hazard analysis and SOPs.
- c. All explosives safety policies will comply with Army and DoD requirements and will be reviewed by explosives safety personnel before approval.
- d. Any safety control measures required, such as through ESSP requirements or hazard analysis to manage A&E risk, will be documented with controls implemented and periodically monitored to ensure compliance.
- e. All organizations with an A&E mission will be aware of and take precautions with any HERO unsafe munitions. If a HERO unsafe munition is located within the ASA facilities or if a munition will be rendered HERO unsafe, the Garrison Safety Office will be notified.

21. RECORDS MANAGEMENT

- a. All organizations with an A&E mission will maintain records as required byARs. Records will be made available for review during external program reviews/audits.
- b. Lightning Protection System (LPS) test and inspection records for the past six inspection cycles will be maintained by the USAG Italy Garrison Safety Office. DPW will forward copies of inspections to QASAS and USAG Italy Safety office.
- c. All organizations with an A&E mission will maintain A&E inventory records to control NEW, Hazard Division (HD), and compatibility requirements per site plans and licensing.
- d. Arms room risk assessments and licenses are found on the USAG Italy SharePoint [IMCOM-ID-E-USAG-Italy Safety Office Arms Rooms All Items (sharepoint-mil.us)] and with the owning unit.
- e. Explosive Safety Site Plans (ESSPs) are maintained at USATCES Supporting documentation is maintained on the USAG Italy SharePoint.
- f. DARADs, waivers, and exemptions are maintained by the unit, USAG Italy, USAREUR Explosives Safety Manager, and USATCES.

22. NONSTANDARD AMMUNITION

- a. Nonstandard ammunition is defined as munitions and/or energetic materials that do not have a standard National Stock Number (NSN) or are not available for procurement through the defense supply system.
 - b. Storage of nonstandard ammunition at the ASA shall be kept to the minimum in

support of approved and funded programs.

- c. Nonstandard ammunition/propellant received with valid stabilizer test data results within the two years before receipt will be accepted for a period not to exceed two years from the last test date, or the date of manufacture.
- d. All nonstandard ammunition requires a DoD, Hazard Division, and Compatibility Group assignment. All nonstandard ammunition that is without properly assigned HD and Compatibility Group, will be stored as HD 1.1 and Compatibility Group L. Small arms items (.50 caliber and below, in which the projectile does not contain energetic other than tracer material) will be stored as HD 1.4, Compatibility Group G. Storage of nonstandard ammunition that requires Compatibility Group L occupies valuable excessive storage space and is discouraged.
- e. DOD-titled nonstandard ammunition in storage or transportation will have the Interim Hazard Classification (IHC) physically present with the ammunition at all times.

23. TRAINING

- a. For all organizations with an A&E mission within USAG Italy operating under DoD 4145.26M, DoD Contractor's Safety Manual for Ammunition and Explosives, training of personnel will be IAW C3.3.3. Personnel shall receive appropriate training before performing work that involves exposure to A&E. The training shall include specific safety and health hazards, emergency procedures including shutdown and safe work practices and safe work practices applicable to the employee's job tasks. The contractor shall ensure that each employee involved in an A&E process has received and understood the training and receives appropriate refresher training. The contractor shall prepare a record that contains the identity of the employee, the date of training and the means used to verify that the employee understood the training. Organizations are responsible for ensuring subcontractors supporting their A&E operations receive appropriate A&E training to meet contractual requirements
- b. All A&E personnel operating under Army Regulations within USAG Italy will be trained IAW DA Pam 385-64, Figure 1-1. Personnel responsible for the development and review of deviations and risk assessments will be trained in explosives risk management.
- c. DA Pam 385-64, Paragraph 1-8.c, authorizes local courses providing the same degree and level of training to be substituted for Figure 1-1 courses, however, any substitution must be approved by the Army Sustainment Command Safety Director IAW DA Pam 385-64.

24. EXPLOSIVES STORAGE

a. Arms Room Licensing and storage will be IAW AR 385-10, Army in Europe and Africa Regulation 385-64, and DA PAM 385-64. USAREUR-AF Safety has developed a

Standardized Arms Room Licensing Template for this purpose. USAG Italy Arms room licenses are found on the USAG Italy SharePoint [https://armyeitaas.sharepoint-mil.us/teams/imcom-id-e-usag-italy-safety-office]. This is a reserved area for Arms Room Management.

- b. Mixed or "Z" compatibility storage will follow the guidance outlined in DA PAM 385-64 and ATP 4-35.1. Mixed storage will not be for convenience and will only be granted temporarily not to exceed 364 days.
- c. Storage of A&E within the ASA will be IAW AR 385-10, DA PAM 385-64, and this ESMP. A&E shall only be stored in structures that are approved for this purpose and have posted storage limits.
 - (1) Supervisors are responsible to ensure all storage requirements are met.
- (2) When conditions are such that storage requirements cannot be maintained IAW approved explosives limits, the Garrison Safety Office will be made aware of the situation immediately.
- d. All facilities containing explosives and ammunition shall be kept clean and orderly, with proper aisle clearance maintained at all times.
- e. Quality Assurance Specialists Ammunition Surveillance (QASAS) are available to provide technical assistance on ammunition and explosives operations. They will also inspect all facilities on an annual basis IAW SB 742-1.

25. Arms Rooms Risk Assessment and Licenses (Ammunition Storage)

- a. DA Pam 385-64 discourages but allows the storage of limited amounts of hazard division (HD) 1.2.2, HD 1.3, and HD 1.4 in arms rooms, hangers, and operations buildings without regard to explosives quantity-distance (QD) requirements if operational necessity requires this storage.
- NOTE: The qualifier *operational necessity* is intended to provide commanders the flexibility to accomplish their missions and training requirements without wasting resources. It is not intended to permit the storage of ammunition in or near inhabited buildings for convenience.
- b. Ammunition storage in ammunition holding areas (AHAs) and at ammunition support activities (ASAs) will be used to store ammunition unless this storage would adversely affect operations or require an unusual commitment of resources (for example, require unit personnel to provide 24-hour security). Locations that have facilities authorized for storing A&E are considered ammunition-storage facilities.
 - c. Hazard Divisions, Storage-Compatibility Groups, and NEQ/NEW Quantities.
 - (1) Hazard Divisions (HD) indicate the character and predominate hazard of

A&E items. HDs are defined in DA Pam 385-64 and are listed for all Army ammunition items on the Joint Hazard Classification System (JHCS) list. The USATCES hazards Classification of U.S. Military Explosives and Ammunition ("Yellow Book") can be used as an unofficial source.

- (2) Units may mix Storage-Compatibility Groups (SCG) (except for items in groups A, K, and L) in amounts up to 453.6kg (1,000 pounds) of Net Explosive Quantity (NEQ) and Net Explosive Weight (NEW) in parenthesis for each storage, provided the items are serviceable and packed in original or like-original containers. AE REG 385-64 Appendix E provides the Army in Europe Storage-Compatibility Chart.
- (3) Storage-Compatibility requirements do not apply to unit ABL when it is stored according to DESR 6055.09 and DA Pam 385-64.
- (4) The high explosives weight of an item is expressed in kilograms and referred to as NEQ in NATO and the Army in Europe. NEQ (QD) limits are listed on all explosive licenses. A maximum NEQ of 22.7kg (50lbs) of HD 1.2.2 may be stored, but fragment barriers must be provided. The minimum acceptable fragment barriers consist of ¼-inch mild steel plate or sandbags. Up to 45.4kg (100lbs) of HD 1.3 and 453.6kg NEQ (1,000lbs) of HD 1.4 are permitted without using fragment barriers.
- (5) Dog-sent kits include approximately 5 to 10 kg of NEQ Hazard Class/Division HC/D 1.1 and must be stored and licensed in a Department of Defense Explosives Safety board (DDESB)-approved location and container. <u>HC/D 1.1 will not be stored in arms rooms.</u>
- d. Risk Assessments. Before storing ammunition in an arms room, units will conduct a risk assessment of potential storage sites using the form provided by the Garrison Safety Office to justify the storage based on operational necessity and safety considerations. The unit commander will approve, sign, and forward the assessment to the Garrison Safety Office through the SharePoint site [https://armyeitaas.sharepoint-mil.us/teams/imcom-id-e-usag-italy-safety-office].
- (1) When evaluating the assessment, the unit commander will consider the need to expose the fewest people to the least amount of explosives for the shortest time possible.
- (2) Units must coordinate inspections with QASAS, Physical Security, FES, DPW and the Garrison Safety Office before receiving a license. A repeat failure of an inspection will generate an email to the unit's BN XO.
- (3) The Garrison Safety Office will keep the risk assessment on the SharePoint site. A copy of the risk assessment and license will be posted in the arms room. All arms-room personnel will be briefed on the risk assessment and will be reviewed at least once a year. This annual review must be documented in the SharePoint.

- (4) The unit commander will ensure that—
- (a) Facilities used to store ammunition are properly licensed. The armsroom ammunition storage license must specify the location approved for storage,
 the amount of ammunition by the Department of Defense identification code
 (DODIC) approved for storage, the time restrictions on storage, and safety,
 security, and fire-protection requirements. The license must be signed by the
 Garrison Safety Manager.
- (b) A&E items are stored in their original container with the original packaging. Arms rooms that support guard forces or military police may have one outer pack of each caliber of small arms ammunition (SAA) open for use.
- (c) Munitions are stored according to storage compatibility requirements. Training ammunition must be physically separated from operational-readiness ammunition.
- (d) Storage is consistent with the safety requirements of DOD 6055.9-STD and the security requirements of AR 190-11. Ammunition will be stored under the same criteria as it would be in an approved ammunition-storage facility.
 - (e) Post the appropriate fire and chemical-hazard signs.
- e. Time Limits. The following criteria define how long training ammunition may be kept in a unit arms room:
- (1) Units located less than 3 hours from an approved ammunition- storage facility (for example, PAHA, ASA7) may store limited amounts of HD 1.2.2, HD 1.3, and HD 1.4 munitions for up to 4 workdays plus the number of training days. Example, if training will be conducted for 5 days, ammunition may be stored for up to 9 workdays (2 workdays before and 2 workdays after the training). Quantity limits for HDs are less than 22.7Kg NEQ (50lbs NEW).
- (2) Units located more than 3 hours from an approved ammunition- storage facility may, when required, store limited amounts (the amount required to support their training needs) of HD 1.2.2, HD 1.3, and HD 1.4 munitions for up to 8 workdays plus the number of training days. Example, if training will be conducted for 5 days, ammunition may be stored for up to 13 workdays (4 workdays before and 4 workdays after the training). Quantity limits for HDs are less than 22.7Kg NEQ (50lbs NEW).
- f. Fire Protection. Fire protection for A&E in inhabited buildings will be managed as follows:
- (1) Appropriate fire and chemical-hazard symbols will be posted on the doors of ammunition storage areas. Procedures will be established to ensure that the fire symbol shows the highest HD of ammunition stored and that chemical-hazard symbols are

displayed if required. These symbols must be removed or covered when ammunition is not present.

- (2) At least two class-10BC fire extinguishers will be available for immediate use when A&E items are being handled. Each fire extinguisher will be:
 - (a) Kept in a fully charged, operable condition.
 - (b) Placed in a conspicuous and readily accessible location.
- (3) Small amounts of flammable or combustible liquids necessary for weapons cleaning and maintenance may be stored in approved storage containers placed at the maximum distance possible from the ammunition.
- g. Ceremonial Ammunition. The storage of ceremonial ammunition is not considered an operational necessity, but a limited amount of HD 1.3 and HD 1.4 ceremonial ammunition (for example, 75 millimeter (mm) blank, 105 mm blank) may be stored in an arms room if no other practical storage means exists. The amount of HD 1.3 and HD 1.4 stored will not be more than 45.4kg NEQ (100 lbs NEW) or three full outer packs of ammunition. All outer packs will remain closed and, if possible, secured with their original seals. Ceremonial ammunition will be physically separated from training and operational ammunition.
- **26.** The USAG Italy Safety Director is the POC for this ESMP. DSN 314-646-5392 or email at james.k.sweatman.civ@army.mil.

SCOTT W. HORRIGAN COL, IN Commanding

References

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- 2. AR 702-6 Ammunition Stockpile Reliability Program (2 Dec 2016)
- 3. ATP 4-35.1 Techniques for Munitions Handlers (8 Nov 2016)
- 4. ATP 5-19 Risk Management (4 Apr 2014)
- 5. DA PAM 385-10 Army Safety Program (RAR 19 Jan 2010) DA PAM 385-30 Risk Management (2 Dec 2014)
- 6. DA PAM 385-40 Army Accident Investigations and Reporting (18 Mar 2015)
- 7. DA PAM 385-64 Ammunition & Explosives Safety Standards (RAR 10 Oct 2013) AER 385-64 Explosives Safety (17 Nov 2006)
- 8. DA PAM 385-65 Explosive & Chemical Site Plan Development & Submission (20 Jul 2009) DoD 4145.26-M Contractor's Safety Manual for Ammunition & Explosives (13 Mar 2008)
- 9. DoD 6055.9-M DoD Ammunition & Explosives Safety Standards (12 Mar 2012)

Glossary

1. AAR	After Action Review
2. AIB	Accident Investigation Board
3. AOR	Area of Operations
4. AR	Army Regulation
5. ASA	Ammunition Support Activity
6. A&E	Ammunition & Explosive(s)
7. BIP	Blow-in-Place (in reference to UXO)
8. CCR	Certificate of Compelling Reason
9. COR	Contracting Officer Representative
10. DA Pam	Department of the Army Pamphlet
11. DARAD	Deviation Approval and Risk Assessment Document
12. DCDR-S	Deputy Commander – Support
13. DCMA	Defense Contract Management Agency
14. DDESB	Department of Defense Explosives Safety Board
15. DES	Directorate of Emergency Services
16. DFARS	Defense Acquisition Regulations System
17. DoD	Department of Defense
18. DPTMS	Directorate of Plans Training Mobilization and Security
19. DPW	Directorate of Public Works
20. ECM	Earth Covered Magazine
21. EOD	Explosive Ordnance Disposal
22. ES	Exposed Site
23. ESC	Explosive Safety Council
24. ESMP	Explosive Safety Management Program
25. ESQD	Explosive Safety Quantity Distance

26. ESS Explosive Safety Siting27. ESSP Explosive Safety Site Plans

28. ESWG Explosives Safety Working Group

29. HC/D Hazard Class/Division

30. HERO Hazards of Electromagnetic Radiation on Ordnance

31. IAW In Accordance With

32. MEC Munitions and Explosives of Concern

33. MHE Material Handling Equipment

34. NEW Net Explosive Weight

35. NGO Non-Government Organizations 36. OGA Other Government Agency

37. PAO Public Affairs Office38. PES Potential Explosion Site

39. POC Point of Contact

40. PPE Personal Protective Equipment 41. OB/OD Open Burning/Open Detonation

42. QASAS Quality Assurance Specialists Ammunition Surveillance

43. QD Quantity Distance

44. RPMP Real Property Master Planning45. RPPB Real Property Planning Board

46. SDZ Surface Danger Zones

47. SOP Standing Operating Procedure

48. USATCES United States Army Technical Center for Explosives Safety

49. UXO Unexploded Ordnance