



DEPARTMENT OF THE ARMY
DIRECTOR OF ARMY SAFETY
9351 HALL ROAD, BUILDING 1456
FORT BELVOIR, VA 22060-5860

DACS-SF

5 December 2014

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Ammunition and Explosives (AE) Risk Management

1. Reference:

- a. DA PAM 385-30, Mishap Risk Management, Major Revision dated 2 Dec 2014.
- b. ATP 5-19, Risk Management, dated 14 April 2014.

2. This memorandum requests addressees:

- a. Reinforce the importance of implementing and maintaining an effective explosives safety management program (ESMP).
- b. Stress the importance of mitigating explosives safety risks to the extent possible and managing residual risk in accordance with the above references when explosives safety standards cannot be met.

3. Background.

a. The consequence of failing to properly manage AE risk can be catastrophic, resulting in death or serious injury, mission failure, loss of mission-critical equipment, waste of limited resources, loss of combat effectiveness, and unacceptable collateral damage. The risk management process outlined in the above references enables Army leaders to make informed risk management and acceptance decisions. (Reference 1a. applies in the non-operational environment, with Reference 1b. providing detailed techniques for risk management in an operational environment.)

b. The Army has revised Reference 1a. to synchronize it with the risk management doctrine in Reference 1b. and to update and improve AE (including chemical agent and munitions) risk management. The revised pamphlet:

(1) Updates and clarifies requirements and terminology for both risk management and deviations from Army standards. Deviations now fall into the below categories:

(a) Waivers. A written authority that permits a temporary deviation from standards for strategic or compelling operational requirements. Event waivers are a special subcategory for use when conditions or circumstances causing the waiver arise unexpectedly and there is insufficient time to comply with formal waiver submission and documentation procedures. Event waivers are for one-time emergency situations, not to exceed one month.

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(b) Exemptions. A written authority permitting long-term noncompliance with standards for strategic or compelling operational requirements. Exemptions are granted for periods greater than five years, to include permanent situations.

(c) Secretarial Certifications. A written authority authorizing construction or major modification of a facility or structure in violation of explosives safety standards.

(2) Updates DA Form 7632, "Certificate of Risk Acceptance," that is now titled "Deviation Approval and Risk Acceptance Document." This form, which documents deviations from Army standards, is available at http://www.apd.army.mil/Forms/browse_forms.asp. Deviations documented by the old form may remain on that form until the deviation is next updated.

c. Recent explosives safety reviews conducted by the Defense Ammunition Center indicate inconsistencies in compliance with AE risk management requirements. As such, addressees are requested to reinforce the following:

(1) An ESMP is required for installations and activities with an AE mission or function. ESMP must document the responsibilities, requirements, and procedures for development, coordination, review, and approval of explosives safety risk management and deviations from Army standards.

(2) Personnel responsible for the development and review of AE risk assessments and deviation documentation must receive AE-related risk management training. In addition to local and command required training, AMMO 54 (Risk Management for and Preparation of SOPs for A&E Operations) is required. This Defense Ammunition Center training is available at http://www.dactces.org/index.php?option=com_content&view=article&id=123&Itemid=77.

(3) The appropriate level of command must accept the risks associated with a deviation from Army standards that remain after implementation of feasible mitigation measures. The level of command required is determined by the duration and level of the risk and the ownership of the resources necessary to control, eliminate or correct the hazard in an appropriate timeframe, as outlined in Table 4-1 of DA PAM 385-30.

(4) Qualified personnel must periodically review deviations involving AE (see Ref 1a., paragraph 4-6) to ensure the risk assessments are current, each exposure and the associated risk and mitigating actions are identified, and the need for continuing the deviation remains valid. Because commanders must maintain awareness of deviations from Army standards, upon a change of command, the incoming leadership must be informed of each existing deviation and accept each risk that requires acceptance at the commander's level.

(5) Copies of deviations involving AE, to include documentation of periodic reviews, must be provided through command channels to the organization's ACOM, ASCC, or DRU safety office for command awareness. Additionally, copies of each deviation and documentation of periodic reviews must be forwarded to the US Army Technical Center for Explosives Safety (USATCES) for data collection and analysis.

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(6) Deviations are intended as temporary measures until the non-conformance can be corrected: they are not a substitute for correcting the non-conformance. In the event a waiver must be reissued, the next higher approval authority must reissue the waiver (see Ref 1a., Table 4-1).

4. Proper execution of risk management is critical to ensuring both safety and readiness, and the key to proper execution of AE risk management is implementing and maintaining an effective ESMP that clearly documents risk management responsibilities, requirements, and procedures. If assistance is needed, please let me know how my staff can assist in improving your command's ESMP.

5. My points of contact are Mr. Jim Patton in the Office of the Director of Army Safety, 703-697-1306, james.t.patton10.civ@mail.mil; and Dr. Upton Shimp at USATCES, 918-420-8847, upton.r.shimp.civ@mail.mil.

6. Army safe is Army strong!



JEFFREY FARNSWORTH
Brigadier General, USA
Director of Army Safety

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