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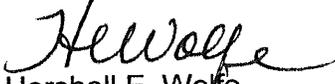
AUG 1 2011

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Storage of Ammunition and Explosives in Arms Rooms

1. Reference DA Pamphlet 385-64, Ammunition and Explosives Safety Standards, dated 24 May 2011.
2. Attached is an updated policy for storage of ammunition and explosives (AE) in arms rooms. This update:
 - a. Corrects the approval authority required for risk assessments for storage of AE in arms rooms.
 - b. Establishes requirements for the storage of AE in arms rooms at Training Forward Operating Bases (TFOBs) and Tactical Training Sites (TTSs) on Army installations.
 - c. Will be incorporated in DA Pamphlet 385-64 during the next rapid action revision.
3. The Army's points of contact are Mr. Bruce Harris, US Army Technical Center for Explosives Safety, 918-420-8804, e-mail bruce.g.harris@us.army.mil; Mr. Jim Patton, Office of the Director of Army Safety, 703-602-4458, e-mail jim-patton@us.army.mil; and J. C. King, Assistant for Munitions and Chemical Matters, ODASA(ESOH), (703) 697-5564, email: jc.king@us.army.mil.

Encl


Hershell E. Wolfe
Deputy Assistant Secretary of the Army
(Environment, Safety and Occupational Health)

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SUBJECT: Storage of Ammunition and Explosives in Arms Rooms

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Arms Room Storage

a. General.

(1) Storage of hazard division (HD) 1.2.2, 1.3, or 1.4 ammunition and explosives (AE) in arms rooms is permitted only when storage in an approved AE storage facility (i.e., an ammunition holding area (AHA) or ammunition supply point (ASP)) would adversely impact operations or result in an unnecessary commitment of resources (e.g., require unit personnel to provide 24-hour security or extended travel).

(2) When storage of training AE that is HD 1.2.2, 1.3, or 1.4 in an approved AE storage area would adversely impact operations or result in an unnecessary commitment of resources the below applies. Access convenience is not considered valid justification for storage of AE outside an approved AE storage area.

(a) Active, Reserve or National Guard units not located near an approved AE storage facility may store such training AE in an arms room for a limited period that shall not exceed the suspense on the issued DA Form 581 (Request for Issue and Turn-In of Ammunition) or 90 days, whichever is shorter.

(b) Active units located in the region of an approved AE storage facility may store such training AE inside an arms room for a limited period not to exceed the suspense on the issued DA Form 581 (Request for Issue and Turn-In of Ammunition) or 30 days, whichever is shorter.

(3) Storage of ceremonial AE that is HD 1.2.2, 1.3, or 1.4 is not considered an operational necessity. However, a limited quantity-- the number of rounds or items required to meet unit training requirements without requiring an excessive number of re-supply efforts--of HD 1.3 and HD 1.4 ceremonial AE (e.g., 75 mm blank, 105 mm blank) may be stored in an arms room provided no other practical alternative exists.

b. Risk assessment and explosives license.

(1) Prior storing AE that is HD 1.2.2, 1.3, or 1.4 in an arms room, the unit commander or the responsible authority will approve a risk assessment that justifies such storage based on operational necessity and/or safety considerations. When considering approval of the risk assessment, the commander or responsible authority will consider the need to expose personnel to the proposed amount of AE for the proposed length of time. Risk assessments for such storage will be coordinated with garrison and/or installation safety, logistics, security, fire protection, and ammunition surveillance personnel. The approved-risk assessment will be posted in the arms room and arms room personnel will be briefed, at least annually, on its contents.

(2) DA PAM 385-30, Mishap Risk Management and a Certificate of Risk Acceptance (CoRA), will not be used to circumvent the above requirements or to store AE that is HD 1.2.2, 1.3, and 1.4 in an arms room for convenience.

(3) Arms rooms will be licensed in compliance with DA PAM 385-64, Chapter 5.

c. Storage limits and requirements. When storage of AE that is HD 1.2.2, 1.3, or 1.4 is approved:

(1) Up to 100 pounds net explosives weight (NEW) of AE that is HD 1.3 and up to 50 pounds NEW of AE that is HD 1.2.2 may be stored, in addition to any HD 1.4 in the arms room. However, only the minimum quantity of AE required will be stored in the arms room.

(2) Ceremonial AE. When an arms room is in the vicinity (30 minutes or less) of an approved AE storage area the amount of ceremonial AE that is HD 1.3 and/or HD 1.4 stored will not exceed one full outer pack. When the arms room is more than 30 minutes from the nearest approved AE storage area, the amount of ceremonial AE that is HD 1.3 and/or HD 1.4 stored will not exceed 100 pounds NEW. The NEW of any ceremonial AE stored will be included in the calculation of HD 1.3 quantities in paragraph c(1) above. Ceremonial AE that is HD 1.2.2, 1.3, and 1.4 may only be stored in the arms room of the unit having the ceremonial mission.

(3) Compliance with quantity-distance (QD) criteria is not required.

(4) When HD 1.2.2 is stored inside or at less than inhabited building distance (IBD) from inhabited buildings (e.g., barracks or office buildings) fragment barriers are required to be used as an mitigating measure. Minimum acceptable fragment barriers include 1/4 inch of mild steel plate, one layer of sand bags, 12 inches of loose sand or soil, or equivalent level protection.

(5) AE will be stored in its original container with original packaging. If it is not, the storage requires an explosives safety site plan. An explosives safety site plan is required because containerization and packing are considered in the HD determination. However, arms rooms that support guard forces or military police may have one outer pack of each caliber of small arms ammunition (ammunition, without projectiles that contain explosives (other than tracers), that is .50 caliber or smaller, or for shotguns) unsealed for use.

(6) Storage of AE that is HD 1.2.2, 1.3, and 1.4 in an arms room will be consistent with the requirements of DA Pamphlet 385-64 and the security requirements of AR 190-11. The use of metal storage containers, cabinets, or cages is required. AE storage in arms rooms must meet the general housekeeping and storage criteria for storage an approved AE storage facility (e.g., no combustibles, solvents, petroleum products, or radioactive items will be stored in the vicinity of the AE).

(7) The appropriate fire and/or chemical hazard symbols will be properly posted on the arm's room door. (If only HD 1.4 ammunition is stored in an arms room the appropriate symbol does need not be posted on the building's exterior, unless installation/facility policy requires posting.)

(8) Property book, hand receipt, accountability and inventory procedures will be consistent with 710-series regulations and pamphlets. Monthly sensitive item inventories of AE stored in arms rooms will include verification that the quantity stored and length of time such storage has occurred are within limits of the approved storage license.

(9) The commander or responsible authority will determine the acceptable duration of storage (see a(2) above) based on a documented risk assessment, consideration of the risks of storage versus the risks of transportation, and training mission requirements.

(10) Training AE, which will be separated as far as physically possible from operational AE, will be distinctly labeled as training ammunition and listed separately on the arms room inventory.

(11) AE will be stored per storage compatibility requirements.

(12) Quantities in excess of the above must comply with all QD requirements of DA PAM 384-64, Chapter 8, including submission of an explosives safety site plan.

d. Storage of HD 1.2.2, HD 1.3, and HD 1.4 ammunition in arms rooms at Training Forward Operating Bases (TFOBs) and Tactical Training Sites (TTSs) on Army installations.

(1) TFOBs and TTSs are defined as any area on an Army installation that replicates an overseas operating base in a theater of operation (e.g., Forward Operating Base (FOB), Combined Operating Base (COB)). On TFOBs and TTSs, the term “arms room” is defined as any site or structure that provides a secure location for storing authorized AE, protects AE assets from the elements, and provides a degree of mitigation from the potential explosives hazards.

(2) AE that is HD 1.2.2, 1.3, and 1.4 that is authorized to be stored in an arms room includes HD 1.2.2 (40mm and below), HD 1.3 (small arms ammunition), and HD 1.4 (smoke grenades, signals, and simulators).

(3) The commander operating the TFOB or TTS will determine the actual quantities to be stored consistent with the cardinal principle of explosives safety--expose the minimum number of people to the minimum amount of explosives for the minimum amount of time--not to exceed the number of rounds or items required to meet unit training requirements without requiring an excessive number of re-supply efforts.

(4) AE storage locations at TFOBs and TTSs do not require an approved explosives safety site plan (ESSP). However, prior to storing AE at a TFOB or TTS, each location must have an approved Explosives Storage License that includes:

(a) The name and/or identifying number of the AE storage location.

(b) The unit responsible for the AE storage location.

(c) The DoD Identification Code (DODIC), HD, storage compatibility group (SCG), maximum authorized quantity, and NEW for each type of AE to be stored.

(d) A risk assessment prepared per DA PAM 385-30 (Mishap Risk Management) or FM 5-19 (Composite Risk Management) that identifies the potential risks associated with storing the identified AE, mitigating measures to reduce risk to exposed personnel and property, and acceptance of any residual risk by the commander responsible for operating the TFOB or TTS.

(5) Completed explosives storage licenses, including the risk assessment, will be coordinated with installation logistics, security, fire protection, and ammunition surveillance personnel. The final coordinating office will be installation safety, both garrison and mission. The senior Safety Director will have final approval authority for each explosives storage license.

(a) Copies of the approved license will be maintained by the Safety Office, the originating unit, and at each licensed location.

(b) Copies of each TFOB and TTS approved explosives storage license and associated risk assessment will be forwarded to the US Army Technical Center for Explosives Safety either electronically to MCAL.DAC.EST.SitePlan@conus.army.mil or hardcopy to Defense Ammunition Center, Attn: JMAC-EST, 1 C Tree Road, Building 35, McAlester, OK 74501-9053.

(6) AE storage must comply with the following:

(a) Munitions must be segregated by DODIC and lot number.

(b) Munitions accountability must be maintained and accurately reflect the quantity on hand in storage. Personnel must ensure that authorized quantities are not exceeded.

(c) AR 190-11 applies.

(d) HD 1.2.2 munitions should be stored in a manner that defeats expected fragments (see paragraph c(4) above).

(e) AE storage locations will be placarded with the appropriate Fire and/or Chemical Hazard Symbols.

(f) Lightning protection or compensatory measures (e.g., withdrawing 100 feet in the event of an electrical storm) must be used.