



## Chemical and Material Risk Management

### FREQUENTLY ASKED QUESTIONS: PHASE I IMPACT ASSESSMENT

#### What is an Emerging Contaminant (EC)?

Emerging Contaminants are chemicals or materials that are characterized by a perceived or real threat to human health or environment. An EC either lacks published health standards or the standards are evolving due to a new understanding of its toxicology. There may also be new pathways or detection limits. This includes both new and known substances.

#### How are ECs selected for a Phase I by the Chemical and Material Risk Management Directorate (CMRMD)?

In coordination with the US Army Center for Health Promotion and Preventive Medicine (USACHPPM) the CMRMD "scans the horizon" for possible materials that fit an EC profile. They review periodicals, scientific journals, and press and regulatory communications to identify candidate ECs that may be of interest to DoD because of changing science or future regulatory actions. Results from this scanning process are passed to the screening process.

The output of the screening process is a recommendation to the CMRMD in the Office of the Deputy Under Secretary of Defense (Installations & Environment) that a particular material is either not of interest to DoD or should be considered for inclusion on the EC Watch List. Watch List candidates are reviewed and approved by the EC Services Steering Committee. Once a chemical is added to the Watch List, it is scheduled for a Phase I Impact Assessment.

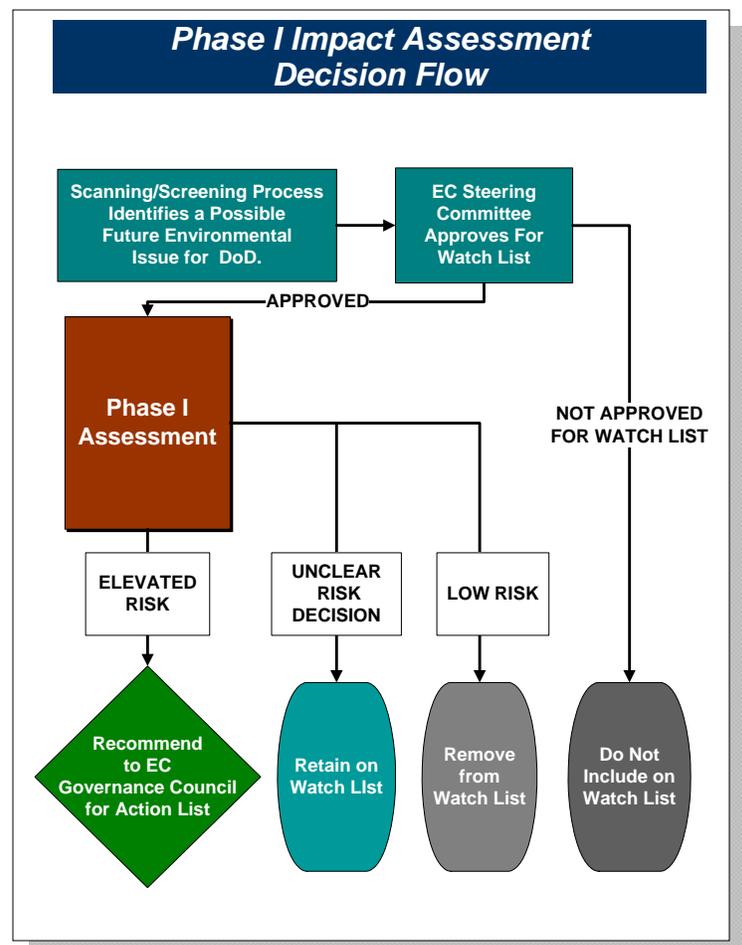
#### What is the Watch List?

The EC Watch List is the list of Emerging Contaminants that are relevant to DOD because changes may negatively impact one of the five DOD functional areas.

#### What is a Phase I Impact Assessment?

A Phase I Impact Assessment is a process where the risk to DoD posed by a potential regulatory change for a chemical is assessed by Subject Matter Experts (SMEs) within DoD. It allows experts who are knowledgeable in five core DoD functional areas to assess the risk to DoD in those areas. It also provides a vehicle for DoD SMEs to propose preliminary risk management options (RMOs)

that can be further explored in subsequent analysis. If a material is determined during the Phase I Assessment to pose a high probable risk to people, the environment, and/or DoD functions, it is presented to the EC Governance Council (ECGC) with a recommendation that it be added to the EC Action List. Additionally, if a material is found to pose a low risk to DoD it can be removed from the Watch List, or simply maintained on the Watch List with continued monitoring.



### What is the Action List?

The EC Action List is maintained by the CMRMD. It is a list of materials that present a high probable risk to people, the environment, and/or DoD functions. Inclusion is based on the results of a Phase I Impact Assessment and approval by the EC Governance Council (ECGC). Because the 2007 Defense Installations Strategic Plan (DISP) calls for DOD managers to proactively address high risk ECs, it also precipitates a significant investment of resources to further define the threat to DoD and develop DoD-wide or application-specific risk management options.

### Who Participates in a Phase I Assessment?

There are two groups of people who participate in a Phase I Assessment. CMRMD and USACHPPM staff and their consulting team provide facilitation and background information. SMEs are volunteers who provide expertise and experience related to one or more of the five DoD functional areas, and are recruited throughout the Phase I process

While not always possible, every effort is made to ensure that all Services and DLA are represented with SMEs in all five functional areas.

### What are the five functional areas?

The Phase I Impact Assessments examine potential impacts to DoD in five specific areas:

- Environment, Safety and Health of DoD and DoD-affected populations (such as communities around a DoD-base).
- Training and Readiness.
- Acquisition/ Research, Development, Testing, and Evaluation (Milestones A through C of the acquisition process).
- Production, Operation, Maintenance, and Disposal of DoD assets. Including facilities, equipment, platforms, and systems and activities following milestone C in the acquisition process).
- Cleanup Program.

### I volunteered or have been asked to be a SME. What is involved?

Subject Matter Experts are the most important resource for the Phase I Impact Assessment. In order to have an efficient meeting with meaningful results, SME preparation and participation is vital. SMEs carefully review the read-ahead package and meeting materials, and come prepared to share their views in the decision-making process. In some cases, previously unforeseen issues surface and must be considered, so keeping an open mind is also very important. The identification of these issues is a real strength of the SME process.

### What can I expect during the Phase I Impact Assessment?

1. The introduction is a brief summary of the read-ahead materials and includes any information obtained following the publication of the read ahead. This is done to establish the baseline assumptions used in the assessment.
2. The impact assessment itself is a collaborative process among the SMEs based on a series of questions that help categorize the risk to DoD in each functional area. This process results in a risk level associated with each functional area.
3. Finally, based on the risk levels generated in the impact assessment, SMEs develop preliminary Risk Management Options.

### What can I expect before the meeting?

The read ahead package is prepared by the EC staff and consultant team in order to establish a baseline of information for the conduct of the meeting. It contains:

- A discussion of the legal and regulatory drivers associated with DoD's interest in the material/chemical.
- Summary information about its use within DoD.
- Brief summary of the operating assumptions to be used during the Phase I Impact Assessment meeting.

This information will form the basis of the assumptions used during the meeting. SME's should feel free to comment on these materials before the Phase I Assessment SME meeting.

### What can I expect after the meeting

Following the Phase I Assessment meeting, the conclusions and consensus risk levels determined during the meeting are captured and included in a final report. The report details the issues identified, as well the range of opinions and uncertainties. It also includes preliminary RMOs proposed by SMEs. Most importantly, the report contains recommendations as to whether the EC should be removed from the Watch List, remain on the watch list, or be elevated to the Action List. The draft report is provided to the SMEs for review and comment to ensure all views and the consensus are captured accurately.

### Where can I get more information?

For more information about the EC evaluation process you can go to the EC Directorate's webpage (<https://www.denix.osd.mil/MERIT>). For specific information about a particular assessment, please contact Tony Pitrat ([tony.pitrat@us.army.mil](mailto:tony.pitrat@us.army.mil))