



ACQUISITION AND
TECHNOLOGY

OFFICE OF THE UNDER SECRETARY OF DEFENSE

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15 MAY 1998

MEMORANDUM FOR INSPECTOR GENERAL OF THE DEPARTMENT OF
DEFENSE

DEPUTY UNDER SECRETARY OF DEFENSE (LOGISTICS)
DIRECTOR OF ADMINISTRATION AND MANAGEMENT
ASSISTANT SECRETARY OF THE ARMY
(INSTALLATIONS, LOGISTICS & ENVIRONMENT)
ASSISTANT SECRETARY OF THE NAVY
(INSTALLATIONS & ENVIRONMENT)
ASSISTANT SECRETARY OF THE AIR FORCE
(MANPOWER, RESERVE AFFAIRS, INSTALLATIONS
& ENVIRONMENT)
DIRECTORS OF THE DEFENSE AGENCIES

SUBJECT: Recycling of Firing-Range Scrap Consisting of Expended Brass and Mixed Metals
Gleaned from Firing-Range Clearance Through Qualified Recycling Programs

DoD Instruction 4715.4, "Pollution Prevention," authorizes Qualified Recycling Programs (QRP) to recycle firing-range scrap consisting of expended brass and mixed metals gleaned from firing range clearance through direct sales. The Inspector General of the Department of Defense in Report 97-213, "Evaluation of the Disposal of Munitions Items," recommended clarification of DoD regulations covering recycling of these items through QRPs.

All DoD components shall ensure that QRPs and direct sales programs follow the procedures contained in DoDI 4715.4, "Pollution Prevention," (June 18, 1996), and this memorandum, when recycling firing-range scrap consisting of expended brass and mixed metals gleaned from firing range clearance. Mixed metals gleaned from firing range clearance is defined as material (e.g., shrapnel) which is in a form that is unrecognizable from its original configuration and does not require further demilitarization, and which is not a Munitions List Item or Commerce Control List Item. Only firing-range scrap consisting of expended brass and mixed metals gleaned from firing range clearance that have been certified as safe may be recycled through a QRP. All other scrap from ammunition, explosives, and dangerous articles (AEDA), even if certified safe, shall be sold through the Defense Reutilization and Marketing Service. All firing-range scrap consisting of expended brass and mixed metals gleaned from range clearance shall be certified as safe by appropriate authority **before** QRPs accept the material for disposal. Such scrap shall be certified as safe only when there is no longer any danger of detonation or explosive reaction. Other requirements include:

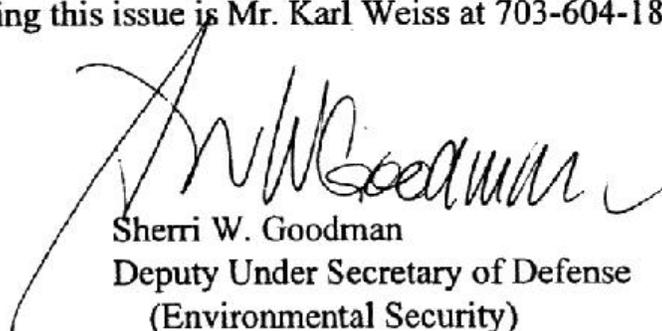


- QRPs shall maintain a list of personnel authorized to certify firing-range scrap consisting of expended brass and mixed metals gleaned from range clearance as safe. This list shall include both names and sample signatures. QRPs shall update this list as necessary;
- QRPs shall segregate from other mixed metals during storage and sale all firing-range scrap consisting of expended brass and mixed metals gleaned from firing range clearance;
- QRPs conducting direct sales shall include the “Dangerous Property” clause (attached) in all contracts for sale of firing-range scrap consisting of expended brass and mixed metals gleaned from range clearance;
- Components shall ensure that QRP personnel are appropriately trained to accept, store, and sell firing-range scrap consisting of expended brass and mixed metals gleaned from range clearance. At a minimum, QRP personnel shall be trained to accomplish the following tasks:
 - How to determine which AEDA material cannot be disposed of through a QRP;
 - How to check both the name **and signature** on all turn-in documents (DD Form 1348-1) against the current list of personnel authorized to certify firing-range scrap consisting of expended brass and mixed metals gleaned from range clearance as safe;
 - How to visually inspect firing-range scrap consisting of expended brass and mixed metals gleaned from range clearance certified as safe to recognize potential explosive safety hazards; and
 - How to report any turned-in firing-range scrap consisting of expended brass and mixed metals gleaned from range clearance that is found not to be safe.

In addition, all DoD components shall conduct frequent compliance reviews of QRPs to ensure established procedures are followed.

In response to the DoD IG report, the Under Secretary of Defense (Acquisition & Technology) has formed an integrated process team (IPT) to develop standard DoD-wide policy, procedures, and training for AEDA material. More guidance on this issue may be forthcoming once the IPT finishes its work.

My POC for questions regarding this issue is Mr. Karl Weiss at 703-604-1846, or DSN: 664-1846.



Sherri W. Goodman
Deputy Under Secretary of Defense
(Environmental Security)