

THE UXO CONUNDRUM

UNDERSTANDING THE SCOPE AND ISSUES

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DEFINITION OF CONUNDRUM

“a confusing and difficult problem or question.”



“a situation for which there is no clear right answer or no good solution”

CHALLENGES OF UXO

- 1. Cleanup not 100% effective...‘no guarantees.’**
- 2. ‘Residual risk’ of harm continues.**
- 3. Risk difficult to quantify and communicate.**

CHALLENGES OF UXO

- 4. No objective standard for acceptable risk.**
- 5. Everyone fears liability.**
- 6. Unable to offer “no further action letters.”**

1. CLEANUP NOT 100% EFFECTIVE 'NO GUARANTEES'

- **State-of-the-art detection technology.**
- **High Site Complexity.**
- **Rugged terrain...scattered UXO.**
- **Process complicated...costly...limited.**

2. 'RESIDUAL RISK' REMAINS

- Not possible to remove all risk.**
- Small but real risk remains.**
- Explosive risk...not chemical exposure.**

3. RISK DIFFICULT TO QUANTIFY & COMMUNICATE

- **Explosive risk much different than chemical.**
- **Small but catastrophic risk.**
- **Traditional site assessment methods are ineffective.**
- **Awareness/precautions lowers risk.**

4. NO STANDARD FOR ACCEPTABLE RISK.

- **‘Catastrophic’ vs. ‘dose-response’ risk.**
- **No action levels for UXO risk.**
- **No ‘official’ DOH cleanup protocol.**
- **No ‘official’ DOH acceptable risk level.**

5. EVERYONE FEAR LIABILITY

- Absence of official standards.**
- Small but real residual risk.**
- Judging catastrophic risk for others.**
- Declaring/implying 'safe' conditions.**

6. “NO FURTHER ACTION” LETTER

- Signals residual risk is acceptable.**
- Implies safe for intended use.**
- Requires science-based standards.**
- Currently not possible without ‘caveats.’**

CONUNDRUM SUMMARY

- **Unavoidable risk of serious harm remains.**
- **Absence of standards to judge safety.**
- **Parties want assurances of safety.**
- **Potential liability is ‘palpable.’**
- **Re-use of property is interrupted.**



HDOH UXO Forum

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