**putting the horse before the cart in munitions response feasibility studies**

*Andrew Schwartz, U.S. Army Corps of Engineers, Huntsville, AL, USA*

There are many changes to the overall technical approach in how the USACE will be performing feasibility studies in its formerly used defense sites (FUDS) program. The changes are in new guidance soon be published in the Army Corps’ Engineer Manual 200-1-15, Technical Guidance for Military Munitions Response Actions. These changes align the USACE’s method of performing the feasibility study with the more commonly used approach in the US EPA’s 1988 RI and FS guidance. This new-to-the-munitions-response-program way of doing the CERCLA feasibility study differs from past approaches in that it requires the entire project team to first identify all the general response actions (GRAs) appropriate to their risk exposures. The next task is to assess for each GRA all technologies that can work within project-specific constraints. The final task is putting together alternatives that mitigate all exposure pathways contributing to unacceptable risk.

Not all of EPA’s FS approach makes sense for munitions response scenarios and the guidance explains those differences. Key among these: the introduction of seven GRAs for munitions clean-up activities; using different process options within different technology types as the basis to build differing remedial alternatives; and assembling alternatives that are specific to each assessment area identified during the MEC risk assessment