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NAS CECIL FIELD  
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LETTER REGARDING NAVAL ORDNANCE SAFETY AND SECURITY ACTIVITY AUDIT OF  
SITE 15 AND SUPPLEMENTAL REMEDIAL INVESTIGATION NAS CECIL FIELD FL  
7/8/2011  
BRAC PMO SOUTHEAST



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Ser BPMOSE med/0183  
8 Jul 11

**From:** Mark Davidson, BRAC Environmental Coordinator, BRAC PMO Southeast  
**To:** Commanding Officer, Naval Ordnance Safety and Security Activity, Indian Head, MD (Attn: Doug Murray)

**Subj:** RESPONSES TO NAVAL ORDNANCE SAFETY AND SECURITY ACTIVITY  
AUDIT OF SITE 15, FORMER NAVAL AIR STATION CECIL FIELD,  
JACKSONVILLE, FLORIDA

**Ref:** (a) Naval Ordnance Safety and Security Activity (NOSSA) letter Ser N539/924 dated 8 Jun 2011, Report of NOSSA Audit of Site 15, Former Naval Air Station Cecil Field, Jacksonville, Florida

**Encl:** (1) Responses to NOSSA Audit Findings dated Jun 08, 2011, MEC Supplemental Remedial Investigation Site 15

1. In response to reference (a), enclosure (1) is submitted.
2. If you should have any questions or require additional information, please do not hesitate to contact Art Sanford, BRAC PMO Southeast, at (843) 743-2135 or by email at [art.sanford@navy.mil](mailto:art.sanford@navy.mil).

A handwritten signature in black ink that reads "Mark E. Davidson".

MARK E. DAVIDSON

Copy to via email (w/enclosure):  
NAVFAC Atlantic (Stacin Martin)  
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TTNUS (Rob Simcik, Linda Klink)

**RESPONSE TO NOSSA AUDIT FINDINGS DATED JUNE 08, 2011  
MEC SUPPLEMENTAL REMEDIAL INVESTIGATION  
SITE 15 [BLUE 10 ORDNANCE DISPOSAL AREA]  
FORMER NAVAL AIR STATION CECIL FIELD, JACKSONVILLE, FLORIDA**

The following responses address findings for the NOSSA audit of Site 15 Cecil Field conducted on 1 June 2011. Please refer to original NOSSA audit letter for the list of references cited in this response.

a. **NOSSA Finding:** The complete ESS approval package was not being maintained at the Munitions Response Site (MRS). Paragraph 5b(10) of reference (b) pertains.

**Root Cause:** The NOSSA endorsement letter was received without the DDESB approval memo attached. The omission was not discovered until NOSSA auditor made note of this fact during audit.

**Corrective Action:** Review all documents for completeness after receipt to avoid this problem in the future.

b. **NOSSA Finding:** The designated explosives driver did not hold a valid state license with a hazardous materials endorsement on his Commercial Driver's License. Paragraph 2-2a of reference (c) pertains.

**Root Cause:** None. Transportation of explosives by Tetra Tech personnel was not to take place on any public roads for this project, only at the worksite. The SAP (reference (g)), worksheet #17, paragraph 17.9.5, 1<sup>st</sup> sentence states; "Explosives to be used for treatment of MEC/MPPEH items will be transported to the treatment area by the explosives vender providing the explosives." Austin Powder located in Anthony, FL was the designated on call explosives provider for this project. Austin Powder stated they would have no problems delivering explosives to the worksite.

**Corrective Action:** None needed for this project.

c. **NOSSA Finding:** The UXO contractor had not developed a Standard Operating Procedure to address all explosive operations being conducted, specifically MPPEH management. Paragraph 2-1.1 of reference (d) and paragraphs 3, 4b(8), and 8b of reference (e) pertain.

**Root Cause:** A detailed site-specific plan for MPPEH management was included in the SAP (reference (g)) in worksheet 17, so it was determined that a SOP was not needed for this activity.

**Corrective Action:** After reviewing the reference cited in finding c. it was determined that a SOP for MPPEH should be created for MPPEH explosive activity for future projects. MPPEH Management SOP has been created and is in the approval process.

d. **NOSSA Finding:** A chain-of-custody form was not available on-site for use. Paragraphs 13-15.7.3 and 13-15.8.1 of reference (d) and paragraph 6.4.2 of reference (f) pertain.

**Root Cause:** The DD Form 1348-1 document normally used for chain-of-custody was omitted from the forms section of this work plan. An electronic version was available from the internet for project use.

**Corrective Action:** Management will add this form to the standard form list for all future projects.

e. **NOSSA Finding:** Not all exclusion zone (EZ) access points were barricaded, as attested by the fact that two unauthorized visitors entered the EZ without authorization while intrusive operations were being conducted. Paragraph 14-7.5 of reference (d) and paragraphs 6.2.1 and 6.2.4 of reference (f) pertain.

**Root Cause:** The two unauthorized visitors listed in the finding entered the EZ on an overgrown trail not discovered during the initial site survey conducted by the UXOSO, project management during previous site walks, or during SAP/ESS preparation.

*Field team response to intrusion:* When the visitors entered the work site, the UXO intrusive team heard their dogs barking and halted intrusive operations. The intrusive team proceeded in the direction of the barking to ascertain the cause of the disturbance. At this same time the UXO Site Manager and the NOSSA Auditor were departing the site after conclusion of the NOSSA audit, they and the UXO intrusive team intercepted the visitors at the same location on the entry route to the site. The visitors were stopped at this point and interviewed by the UXOSO and the UXO Site Manager to determine where and how they had entered the site. The visitors stated that they had walked down a trail from the recreation center located east of the worksite and had not seen any signs or barricades on the route they had taken. The UXO Site Manager asked the visitors if they would show them the route they had taken to the site, they replied yes, and so the UXO Site Manager and the UXOSO escorted the visitors to the access location. The visitors showed the UXOSO and UXO Site Manager the point where they got on to the access road and then departed the site using the same route they used to enter the site. The UXOSO barricaded this new entry point, conducted a new survey of the site perimeter, and determined that no other entry points like the one used by the unauthorized visitors was located anywhere along the perimeter. Satisfied that the work site was secure, the field team returned to work.

The SAP (reference (g)) Worksheet #17, paragraph 17.2.2, describes the procedures to be followed when an intruder is discovered in the EZ. These procedures were followed.

**Corrective Action:** In the future the field team will be more vigilant of potential access points and post additional signage as needed.

f. **NOSSA Finding:** Not all Material Documented as Safe (MDAS) items were secured on site in a locked/sealed container. Paragraph 6.3 of reference (f) pertains.

**Root Cause:** The field team found empty propellant cans on site that they inspected for explosives and then left sitting next to the MDAS drum.

**Corrective Action:** UXO field teams were instructed to review MPPEH management procedures and definition for MPPEH as stated in OP-5. All MPPEH (including empty crushed propellant cans) are to be inspected and certified as MDAS or MDEH after inspection. The MPPEH Management SOP will include the definition of MPPEH, MDEH and MDAS to prevent future occurrences.

g. **NOSSA Finding:** MDAS was being stored in a container with a broken seal. Paragraph 6.4.2 of reference (f) and paragraph 17.12 of reference (g) pertain.

**Root Cause:** The seal on the MDAS container was applied with too much tension causing the seal to break during the night.

**Corrective Action:** Contents of MDAS drum were inventoried, inspected, and certified. All original MDAS items were accounted for during the inventory. The container was resealed using a new seal technique consisting of using two seals to seal the drum; this technique relieves the tension on the seal, which should prevent breakage.

h. **NOSSA Finding:** Individual training to identify personnel, who through record review and attendance at site-specific training are cleared for participation in MRS activities, was being improperly documented. Paragraph 6.3 of reference (h) pertains.

**Root Cause:** Field form MRP FF.1 was used for sign off sheet to the APP, in place of page 20 of the APP.

**Corrective Action:** The SUXOS and UXOSO were instructed that new field form MRP FF.1 is only for the documentation of SAP training and to continue the use of the form on page 20 in the APP to document APP training. For future projects, Tetra Tech will place a copy of APP Sign-off Form in the Forms section of the SAP along with all other forms. The APP Sign-off Forms will be added to the Preparatory Phase Inspection for Site Specific Training on future projects for quality control purposes.