



DEPARTMENT OF THE NAVY
NAVAL ORDNANCE SAFETY & SECURITY ACTIVITY
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SSIC NO. 5090.3

8020
Ser N539/823
22 May 07

From: Commanding Officer, Naval Ordnance Safety and Security Activity
To: Director, Base Realignment and Closure Program Management Office West
Subj: AUDIT REPORT FOR INSTALLATION RESTORATION SITE 1, FORMER NAVAL AIR STATION ALAMEDA, ALAMEDA POINT, ALAMEDA, CALIFORNIA
Ref: (a) OPNAVINST 8020.15
(b) NOSSAINST 8020.15A
(c) NOSSA ltr 8020 Ser N539/641 of 17 Apr 07
Encl: (1) Audit Report

1. In accordance with references (a) and (b), and as announced by reference (c), the Naval Ordnance Safety and Security Activity (NOSSA) conducted an audit of the subject munitions response project on 9-10 May 2007. The purpose of the audit was to assess compliance with applicable explosives safety requirements. The NOSSA auditor reviewed project documentation and observed field activities.

2. While the Unexploded Ordnance (UXO) contractor is generally executing operations in a safe and effective manner, the audit disclosed several discrepancies (see enclosure (1) for details). Each finding is of concern to NOSSA and requires that the addressee analyze the root causes, direct the contractor to take appropriate corrective actions, and identify both in a response to NOSSA.

3. The NOSSA point of contact for this audit is Mr. Douglas Murray, who can be reached at DSN 354-4450 or commercial (301) 744-4450.


PAMELA G. CLEMENTS
By direction

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NAVAL AIR STATION ALAMEDA, ALAMEDA POINT, ALAMEDA,
CALIFORNIA

Copy to:

CNO (N45C1)

NOSSA (N54)

NOSSA ESSOPAC (N5P)

NAVEODTECHDIV (N512J)

AUDIT REPORT

- Ref (a) OPNAVINST 8020.15
(b) NOSSA INST 8020.15A
(c) OP5
(d) Final Explosives Safety Submission (ESS), Revision 2 of 9 March 2007, for Installation Restoration (IR) Site 1, Former Naval Air Station Alameda, Alameda Point, Alameda, California
(e) Final Time-Critical Removal Action Work Plan, of 2 March 2007, for IR Sites 1, 2, and 32, Former Naval Air Station Alameda, Alameda Point, Alameda, California

1. Purpose: As part of its oversight authority delegated by reference (a), NOSSA audits munitions response projects in accordance with references (b) and (c) to assess the extent to which the projects comply with applicable explosives safety and environmental requirements related to the management of Munitions and Explosives of Concern (MEC) and Material Potentially Presenting an Explosive Hazard (MPPEH). NOSSA auditors also assess the contractor quality control (QC) and government quality assurance (QA) programs.

2. Audited MRP Project: IR Site 1 at the Former Naval Air Station Alameda, Alameda Point, Alameda, California.

3. Audit team:

Name	Title	Agency/Activity
Douglas Murray	Lead Auditor	NOSSA (N539)

4. Key audit components:

a. Personnel contacted:

Name	Title	Agency/Activity
Andrew Baughman	Remedial Project Manager	BRAC PMO West
Abram Eloskof	Project Manager	TetraTech EC, Inc.
Bob Wells	Site Manager	TetraTech EC, Inc.
George Bridgeman	Senior UXO Supervisor (SUXOS)	TetraTech EC, Inc.
Bill Dickson	UXO QC and UXO Health and Safety Officer	TetraTech EC, Inc.
Jay Johnson	UXO QA Specialist (under contract to BRAC PMO West)	Engineering/Remediation Resources Group, Inc.

b. Documents audited: References (d) and (e).

c. Areas audited:

- (1) MEC/MPPEH removal operations;
- (2) Data management;
- (3) Environmental protection;
- (4) Explosives safety practices;
- (5) Explosives storage;
- (6) Explosives transportation;
- (7) Geophysical instrument operations;
- (8) Mechanical excavation and screening;
- (9) Occupational health and safety;
- (10) Worker qualifications;
- (11) Worker training;
- (12) Contractor QC program; and
- (13) Government QA program.

d. Areas not audited due to inactivity while the audit team was on site:

- (1) Certification and verification of MPPEH.

5. Audit plan and checklist: (see enclosure (6) of reference (b)).

6. Methodology: Audits follow procedures similar to those outlined in "Guidelines for Auditing Quality Systems" and "Guidelines for Environmental Auditing—General Principles", both published by the American Society for Quality, and the "Guidance on Technical Audits and Related Assessments for Environmental Data Operations" published by the U.S. Environmental Protection Agency.

7. Discrepancies:

a. Not all metal parts of Magazine M353 were properly grounded/bonded because the grounding wire was broken. Reference (c) pertains.

b. The potential hazards associated with MEC were not identified in the Health and Safety Plan. Reference (e), Appendix A pertains.

c. Recovered MPPEH were not being photographed. Reference (d) and Reference (e), Appendix D-11 pertain.

d. The Trommel 6-in grizzly was broken, allowing up to 14-in material to enter. (Corrected during audit.) Reference (d) and Reference (e), Appendix D-11 pertain.

e. Non-conforming conditions reported in Daily QC Reports were not reflected in the QC Acceptance Sampling Log. (Corrected during audit.) Reference (e), Appendix C pertains.

f. No method was in place to identify debris lots for QC acceptance or rejection. (Corrected during audit.) Reference (d) and Reference (e), Appendix C pertain.

g. The risks associated with recovering MEC had not been assessed. (Corrected during audit.) Reference (d) pertains.

h. Access protocols for authorized visitors did not comply with Reference (d) requirements. Reference (d) and Reference (e), Appendix A pertain.

i. UXO technicians were not able to monitor all of the oversize material as it exited the Trommel and the screening plant configuration was not in accordance with the approved ESS. (Corrected during audit.) Reference (d) pertains.

j. The Exclusion Zone (EZ) was not being managed in accordance with the ESS. Specifically, a patrol boat was not being used to prevent recreational boaters from entering the EZ, and the limits of the EZ on land are not clearly marked; however, site personnel were aware of EZ requirements. References (d) and Reference (e), Appendix D-11 pertain.

k. The explosives transportation vehicle did not have all required equipment. (Corrected during audit.) Reference e, Appendix D-11 pertain.

l. High-security locks were not being used to secure Magazines M353 and M354. (Corrected during audit.) Reference (d) pertains.

m. The document to be used to record the MPPEH demilitarization certification was not in accordance with the Defense Demilitarization Manual. Reference (d) pertains.

n. Vegetation cutting occurred during the 1 April through 31 August peak nesting season of susceptible wildlife species. Reference (d) pertains.

o. The keys for Magazines M353 and M354 were not being maintained exclusively by the SUXOS. (Corrected during audit.) Reference (d) pertains.

8. Observations:

a. The cognizant Explosive Ordnance Disposal (EOD) unit at Travis Air Force Base is reluctant to provide the technical support outlined in Reference (d) and Appendix D-11 of Reference (e). To clearly identify the responsibilities of all parties involved a Memorandum or Agreement (or similar document) between BRAC PMO West and this EOD unit should have been executed prior to the project starting.

b. The Navy QA inspector was unaware of a 2 May 07 non-conformance report or of the subsequent corrective action.

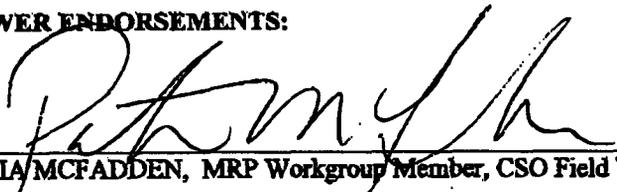
9. Conclusions: Overall, the UXO contractor is executing operations in a safe and effective manner. However, the discrepancies noted above are of concern to NOSSA. BRAC PMO West should analyze the root cause for each, direct the contractor to take appropriate corrective action, and identify both in a response to this audit report. As described in references (a) and (b), NOSSA requires satisfactory responses to audit discrepancies before it can provide final verification that the munitions response actions were adequately completed per the approved ESSs.

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TRANSMITTAL/REVIEW ROUTING SLIP

DOCUMENT ATTACHED: BRAC PMO West Response to the Naval Ordnance Safety & Security Activity (NOSSA) Audit Report for the Time-Critical Removal Action Installation Restoration Sites 1, 2, and 32, Alameda Point, Alameda, CA

REVIEWER ENDORSEMENTS:



 PATRICIA MCFADDEN, MRP Workgroup Member, CSO Field Team Leader

7/11/07

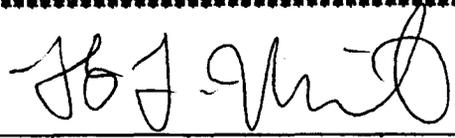
 Date



 ANDREW L. BAUGHMAN, REM

7/11/2007

 Date



 THOMAS MACCIARELLA, BEC

7/11/07

 Date



 ALAN LEE, BASE CLOSURE MANAGER

7/11/07

 Date

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