

CHAPTER 3

Planning Considerations for MEC Support

3-1. Introduction. This chapter discusses the requirements that must be addressed prior to initiating MEC support activities during HTRW and construction activities on sites known or suspected to contain MEC. The objective of MEC support activities is to conduct safe and efficient operations while limiting potential exposure to a minimum number of personnel for a minimum time and to the minimum amount of MEC.

3-2. Planning Documents. Site-specific planning documents that detail the methodologies that will be used during the MEC support project will be prepared. For anomaly avoidance activities, the planning document is the HTRW Work Plan. For MEC support during construction activities, the planning documents include the Work Plan and appropriate subplans and appendices (and an ESS, if required). For range construction projects (including target maintenance), the planning documents include plans and specifications (an ESS is not required). The planning documents will be prepared in accordance with the project SOW and contract requirements. The PDT will ensure that these documents are consistent with each other.

3-3. MEC Support Work Plan.

a. For anomaly avoidance and construction activities, a MEC Support Work Plan will be prepared to supplement the prime contractor's or USACE's Work Plan/Site Plan. The MEC Support Work Plan will be prepared in accordance with the project SOW and contract requirements.

b. Content. The MEC Support Work Plan does not need to be comprehensive, as it is a supplement to the overall site Work Plan. The MEC Support Work Plan will detail the management approach and operational procedures that will be used to complete the MEC support activity. The MEC Support Work Plan will indicate the specific geophysical instrument that the UXO team intends to use. The MEC Support Work Plan will include an APP/SSHP that specifically addresses MEC operations. The PDT will ensure that the MEC Support Work Plan and all appropriate subplans (e.g., APP/SSHP, ESS, etc.) are consistent.

c. The MEC Support Work Plan will be submitted by the contractor to the PM for review and comment by the PDT. The PM will then forward one copy to the MM CX. The MM CX will review and provide comments and written concurrence or nonconcurrence on

the planning documents containing MEC support provisions. The MM CX will be allocated 15 calendar days from the date of receipt for this review. If no comments are received from the MM CX within this time frame, concurrence will be assumed by the executing agency.

d. The accepted MEC Support Work Plan will serve as the contractual basis for all subsequent MEC activities. Current copies of the MEC Support Work Plan will be kept for reference by the PM, the contractor's senior site representative or safety manager, the UXO team, and the OE Safety Specialist (if required onsite). The accepted MEC Support Work Plan will be maintained in the district office.

e. For those sites where subsurface removal in support of construction activities is required, the MEC Support Work Plan will contain the appropriate subplans and appendices from the following list, based on the MEC support project requirements and information already contained in the overall Work Plan:

- (1) Technical Management Plan.
- (2) Explosives Management Plan.
- (3) Explosives Siting Plan (ESP).
- (4) Geophysical Prove-out Plan and Report.
- (5) Geophysical Investigation Plan.
- (6) Geospatial Information and Electronic Submittals.
- (7) Work, Data, and Cost Management Plan.
- (8) Property Management Plan.
- (9) Quality Control (QC) Plan.
- (10) Environmental Protection Plan.
- (11) Investigative Derived Waste (IDW) Plan.
- (12) Appendix – Task Order SOW.
- (13) Appendix – Site Maps.

(14) Appendix – Local POCs.

(15) Appendix – APP/SSHP.

(16) Appendix – Munitions Constituents Sampling and Analysis Plan.

(17) Appendix – Contractor Forms.

(18) Appendix – Minimum Separation Distance (MSD) Calculation Sheets.

(19) Appendix – Resumes.

f. Modifications. Changes may be required to the MEC Support Work Plan and/or APP/SSHP after approval by the Contracting Officer. A modification that affects any MEC subsurface removal operational and/or safety procedure may also require a revision to and re-approval of the ESP and/or ESS.

3-4. ESP.

a. General.

(1) An ESP, a component of the MEC Support Work Plan, is prepared only for MEC support during construction activities where MEC removal is planned. The ESP will provide explosives safety criteria for planning and siting explosive operations. The ESP discusses the proposed MSDs for unintentional detonations, intentional detonations, and siting of critical project components. The ESP will describe the basis of design, all design calculations, and proposed hazard mitigation measures to be implemented to protect the public, non-project personnel, and site workers from explosive hazards. The ESP will be reviewed by the PDT to ensure that the appropriate MSD criteria have been applied.

(2) The ESP will discuss the following explosive operations: Munitions Response Areas (MRAs), explosives storage magazines, and planned or established demolition areas. The location of these explosives operations will be sited on a map with a scale of 1 inch equals 400 feet. A larger scale may be used if available and if a map using such a scale is not too large to be included in the Work Plan. A smaller scale is acceptable if distances can be accurately shown. If an unscaled map is used, the map must have labeled distances. The MSDs calculated for the operation will be discussed in the text of the plan and Quantity-Distance (Q-D) arcs for the above-listed project elements will be drawn on the map.

(3) Q-D. Explosives safety distance tables prescribe the necessary separations and specify the maximum quantities for various classes of explosives permitted in any one location. The Q-D tables provided in DOD 6055.9-STD reflect the acceptable minimum criteria for the storage and handling of various classes and amounts of explosives. These distances will be used for siting storage locations. The project will site Open Burn/Open Detonation areas in accordance with EP 1110-1-17.

b. MRAs. During intrusive operations (i.e., operations that involve or result in the penetration of the ground surface at an area known or suspected to contain MEC. See EP 1110-1-18 for additional details), the MSD will be determined using two sets of criteria. The first set of criteria has been established for unintentional detonations (i.e., not planned in advance), and the second set of criteria has been established for intentional detonations (i.e., planned, controlled detonations). Details on calculating MSDs are published in EM 1110-1-4009.

(1) Unintentional Detonations. For an unintentional detonation, the applicable MSDs are the MSDs for unintentional detonations and the team separation distance (TSD). The MSD for unintentional detonations is the minimum distance that non-essential personnel and the public must be separated from intrusive operations. The TSD is the minimum distance that project teams must be separated during intrusive operations.

(2) Intentional Detonations. The MSD for intentional detonations is the distance that both project personnel and the public must be from the intentional detonation.

c. Explosives Storage Magazines.

(1) The ESP will provide the following information on explosives storage magazines:

(a) Type(s) of magazines used (e.g., Bureau of Alcohol, Tobacco, and Firearms (ATF) classification, portable, commercial, above ground, shed, earth covered, etc.). See DOD 6055.9-STD for further information and definitions on the types of magazines to be used for explosives storage.

(b) Net Explosive Weight (NEW) and hazard division to be stored in each magazine. Generally, recovered MEC is considered Hazard Division 1.1. See 6055.9-STD for further information and definitions on Hazard Divisions.

(c) Q-D criteria used to site the magazine.

(d) Design criteria for any proposed engineering controls to be used to mitigate exposures to the public when Q-D criteria cannot be met.

(2) Magazines must also be properly placarded, and the property must be secured. DOD magazines storing explosives must have the appropriate fire fighting symbol or locally required DOD Hazard Classification assigned. Additional details on how explosives must be stored and secured are published in EP 1110-1-18.

d. Planned or Established Demolition Areas. The MSDs for these areas will be based on the MSD criteria for intentional detonations.

e. Footprint Areas. The following footprint areas will be discussed in the ESP: blow-in-place, collection points, and in-grid consolidated shots. These areas, however, do not have to be shown on the site map. The MSDs for these footprint areas are described in the following paragraphs.

(1) Blow-in-Place. Blow-in-place is the preferred method for disposal of MEC. Blow-in-place occurs when a MEC is prepared for detonation and detonated in-place. The MSD for blow-in-place areas will be determined using the MSD criteria for intentional detonations.

(2) Collection Points. Collection points are areas where recovered MEC that is acceptable to move is temporarily accumulated within a search grid pending relocation to another area for storage or destruction. Collection points will be limited to the amount of explosives such that the K50 total of the rounds to be destroyed will not exceed the MSD. (The K value is the safety factor used in determining the MSD for unintentional detonations. See DOD 6055.9-STD for additional details on the establishment of K values.) The MSD for collection points will be determined using the MSD criteria for unintentional detonations.

(3) In-Grid Consolidated Shots. In-grid consolidated shots occur when recovered MEC that is acceptable to be relocated is collected and destroyed within a search grid. In contrast to an established demolition ground, consolidated shots occur within a search grid rather than in a separate area. The procedures for in-grid consolidated shots are presented in the USAESCH document titled "Procedures for Demolition of Multiple Rounds (Consolidated Shots) on OE Sites."

f. Exceptions. The calculated MSDs for unintentional detonations specified above are considered minimums for execution of normal operations. When site conditions exist that make it impossible or impractical to comply with these minimums, the PM may request consideration of a possible reduction. Any request for a reduction of these MSDs will be

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staffed through the MM CX for calculation. This information will be forwarded to the PM, who will forward it to the District Safety Office for a decision concerning the reduction of the exclusion area. For any requested reduction to the specified MSDs for unintentional detonations, a detailed hazard analysis, which explains why these reductions are necessary and acceptable, must be documented.

3-5. Conventional ESS.

a. ESS.

(1) The purpose of the ESS is to ensure that all applicable DOD and DA regulations regarding safe and secure handling of military munitions are followed.

(2) Intrusive activities cannot commence until the DDESB approves the ESS and the contractor has been directed to incorporate changes resulting from ESS approval into the MEC Support Work Plan. A copy of the approved ESS will be maintained at the project site. All operations will be executed in accordance with the approved ESS.

(3) Detailed guidance on the preparation and approval process associated with the ESS may be found in EP 385-1-95b and DDESB's "Memorandum Guidance for Clearance Plans."

b. Construction support involving removal of MEC in the construction footprint will require submittal and approval of an ESS. An ESS is not required for standby construction support or anomaly avoidance. The ESS will be tailored to meet site-specific requirements.

c. When an element of the approved ESS changes, the ESS must be changed. The contractor shall prepare the proposed change and forward it to the PM, who will forward it to the MM CX for review. The MM CX will forward the proposed changes to the appropriate agency for approval. For a change that specifies less restrictive requirements (e.g., reduction in the exclusion zone), the contractor shall comply with the accepted ESS until the change is approved. When the proposed changes would result in more restrictive requirements (e.g., increase in the exclusion zone), the contractor shall apply the more restrictive measures immediately during the ESS change approval process.

3-6. Personnel Qualifications and Work Standards. USACE has set forth personnel standards applicable to all UXO personnel working for USACE. These qualifications and standards, which detail the educational and experience requirements for UXO personnel, are available in EP 1110-1-18.

3-7. Training. USACE and contractor personnel shall be in compliance with training requirements prior to conducting MEC support activities. Training requirements are published in EP 1110-1-18. The training topics included in EP 1110-1-18 pertain to 29 CFR 1910, 29 CFR 1926, Initial Training, Refresher Training, Cardiopulmonary Resuscitation (CPR)/First Aid, Medical Surveillance, Visitor Training, and Blood Borne Pathogen training. Additional training information is contained in ER 385-1-95.

3-8. Explosives Safety. There are no “safe” methods for dealing with MEC, merely procedures and process controls that are designed to reduce potential hazards. Maximum safety in conducting any MEC operations can be achieved through adherence to applicable safety precautions, a planned approach, intensive supervision, and MEC safety oversight. UXO-qualified personnel will conduct a site safety briefing prior to commencing operational activities each workday. All activities with potential exposure to MEC will be reviewed to identify the associated risks and appropriate mitigation procedures. Operations within areas suspected of containing MEC must be conducted in a manner that exposes a minimum number of people to the smallest quantity of explosives for the shortest period of time.

a. General Safety Considerations.

(1) General safety considerations applicable to personnel, both essential and non-essential, at project sites where MEC may be encountered include:

(a) Do not carry fire or spark-producing devices.

(b) Do not conduct explosive or explosive-related operations, without approved procedures, proper supervision, and MEC standby support.

(c) Do not become careless by reason of familiarity with MEC or the reported probability level of MEC.

(d) Do not conduct explosive or potentially explosive operations during inclement weather.

(e) Avoid contact with MEC except during MEC removal conducted during construction activities.

(f) Conduct MEC-related operations during daylight hours only.

(g) Employ the “buddy system” at all times.

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(2) EP 385-1-95a provides additional considerations for safety at project sites where MEC may be encountered.

b. Activity Hazard Analysis.

(1) Activity Hazard Analyses will be performed in accordance with EM 385-1-1. Activity Hazard Analyses will be conducted by personnel who are knowledgeable with respect to MEC safety standards and requirements. These personnel must understand the specific operational requirements and hazard analysis methodologies. A hazard analysis will be performed for each activity to determine the significance of any potential explosive-related hazards. For example, residual explosives from ordnance fillers may be exposed during an HTRW sampling activity. Explosive residues may be in the form of powder or various granular and powder-based pellets. These contaminants can enter the body through the skin or by ingestion if proper personal hygiene practices are not followed. Explosive fillers such as white phosphorus are dangerously reactive in air and acute exposure can result in serious injury to the skin, eyes, and mucous membranes. They are also a fire hazard.

(2) Safety requirements (or alternatives) that will either eliminate the identified hazards or control them to reduce the associated risks to an acceptable level will be developed. The adequacy of the operational and support procedures that will be implemented to eliminate, control, or abate identified hazards or risks will then be evaluated and a second risk assessment completed to verify that a satisfactory safety level has been achieved.

c. Hazards of Electromagnetic Radiation to Ordnance.

(1) Some ordnance items and other electro-explosive devices (EEDs) are particularly susceptible to electromagnetic radiation (EMR) in the radio frequency (RF) range originating from devices such as radio, radar, and television transmitters. The presence of antennas and communication and radar devices will be noted on initial site visits and/or preliminary assessments of eligibility. In addition, active and passive subsurface detection devices emit EMR/RF. Each type of equipment producing EMR/RF must be reviewed and a hazard analysis completed. The level of EMR/RF susceptibility and potential hazard is a result of the design and type of MEC or EED that may be present. Therefore, a knowledge of what MEC is normally unsafe in the presence of EMR/RF is important so that preventive steps can be taken if such MEC is encountered. The MM CX will be consulted when geophysical investigations are planned in areas potentially containing electric-fuzed ordnance.

(2) As part of the hazard analysis, the MSD between an EMR/RF emitting device and potential EEDs will be calculated. This calculation is based on the characteristics of the transmitting device and the potential EEDs. The important characteristics of the EMR/RF source device include:

- (a) The transmitter frequency (f, in MHz).
- (b) The peak envelope transmitting power (Pt, in W).
- (c) The transmitter gain (GdB).

(3) Minimum safe distances from EMR/RF sources are listed in Tables 2-2, 2-3, and 2-4 of TM 9-1375-213-12.

3-9. PPE.

a. All UXO team members will be trained in the use of, medically qualified for, and physically able to wear the prescribed PPE. PPE for MEC support operations will be determined by site-specific and task-specific analyses, documented in the APP/SSHP, and worn as indicated in the plans. Specific requirements for PPE are described in the following paragraphs.

(1) PPE will comply with the most stringent requirements of EM 385-1-1 and the applicable portions of 29 CFR 1910 Subpart I or 29 CFR 1926 Subpart E.

(2) Footwear. In addition to the applicable requirements in the references cited above, shoes or boots with high traction soles and ankle protection will be used. During geophysical detection activities, UXO personnel will not wear safety shoes or other footwear that would cause interference with instrument operations.

(3) Clothing. Short sleeve shirts and long pants are considered the minimum clothing suitable for MEC operations and will be worn at all work sites, unless variations are described, analyzed, and documented in the accepted APP/SSHP.

(4) Head Protection. Personnel working in or visiting designated hardhat areas will be required to wear head protection meeting ANSI Z89.1 standards. Hardhat areas for MEC operations will not be designated unless the activity hazard analysis shows a possible overhead hazard.

b. UXO personnel using PPE will be knowledgeable of the limitations of the selected PPE as well as the reduced performance levels the equipment might impose on them when they are conducting assigned tasks.

3-10. Fire Prevention.

a. Fire prevention awareness is especially important in areas with known or suspected MEC. Smoking will be permitted only in controlled areas where all combustibles (e.g., vegetation, fuel cans, sampling supplies) have been removed or sufficient firebreaks have been established. Personnel may attempt to extinguish minor fires with fire extinguishers if they are trained to do so safely without endangering themselves or others within the vicinity of the fire.

b. If a fire becomes uncontrollable or extends into areas that may contain MEC, all personnel must immediately suspend any fire fighting efforts and retreat to a safe distance, which is at least the maximum fragment distance of the military munition with the greatest fragmentation distance (MGFD), (i.e., the military munition with the greatest fragmentation distance that might be recovered as a result of previous training activities based on historical information). Personnel will retreat upwind of the fire. The senior UXO-qualified person present will then lead an immediate evacuation of the area using available resources to ensure the safety of all personnel.

3-11. Emergency Procedures. MEC operations may result in accidents or incidents, regardless of the safeguards implemented. The APP/SSHP will describe site-specific emergency response procedures, including identification of all appropriate POCs. All personnel must be briefed on the emergency response procedures and protocols discussed in the APP/SSHP.

a. Contingency Plan. A contingency plan will be developed if anomaly avoidance is going to be conducted, to detail the procedures that will be used in the event that munitions with unknown fillers and/or Recovered Chemical Warfare Materiel (RCWM), unusual odors, or discolored soil are encountered. The contingency plan will be initiated if munitions with unknown fillers and/or RCWM, unusual odors, or discolored soil is encountered or site personnel exhibit symptoms attributable to a chemical exposure (i.e., respiratory irritation and/or skin irritation).

b. Emergency Response. In the event of a MEC-related emergency on-site during anomaly avoidance, the senior UXO-qualified person present will direct the course of action until the local POC designated in the Work Plan has been notified. In the event of a MEC-

related emergency on-site during construction support, the Senior UXO Supervisor (SUXOS) will direct the course of action until the local POC designated in the Work Plan has been notified. It may be necessary for other on-site personnel to provide assistance. If an emergency response rescue operation is required, no one will reenter the accident area until the hazards of the situation have been assessed by the responsible individual (see above), and all required resources are on-hand to complete the rescue without jeopardizing the safety of rescue personnel.

c. Emergency Rescue. The senior UXO-qualified person or the local POC, as applicable, will direct any MEC-related emergency response rescue operation. Response considerations include the following elements:

- (1) Designation of an emergency response vehicle(s) to remain on-site during rescue operations.
- (2) Determination of existing hazards, as well as the potential for additional hazards.
- (3) Notification of local officials.
- (4) Coordination with USACE in the review of the need to alert the local community and/or subsequent coordination with installation or other customer's Public Affairs Office.
- (5) Assessment of the situation and condition of any victims.
- (6) Determination of the resources needed for victim stabilization and transport and additional emergency support.
- (7) Enforcement of the "buddy system". No one will be permitted to enter a rescue area alone.
- (8) Oversight of the removal of injured personnel from the area.
- (9) Consultation with on-site safety officers to establish decontamination protocols. Decontamination of injured parties will be accomplished after stabilization of their medical conditions. Decontamination need not be accomplished if the victim's condition is poor and if the decontamination process may cause an immediate threat or additional injury to the victim. If contamination is suspected, the victim will be wrapped in material that will prevent the spread of contamination during extraction and transport. Emergency medical personnel will be advised of potential injuries, as well as potential contamination, of the patient as early

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as possible. The patient will not be transported to a medical facility without prior notification of, and coordination with, the receiving facility regarding potential contamination.

d. Mishap Reporting and Investigation Requirements. The following information provides guidelines to be followed for reporting explosive mishaps on MEC support projects. Site-specific reporting and investigation procedures, including identification of appropriate POCs, will be included in the APP/SSHP.

(1) Reporting Requirements. All mishaps shall be investigated by the contractor and reported to the Contracting Officer and OE Safety Specialist or to the government authority cited in the SOW. Notification and reporting of mishaps will be in accordance with USACE Supplement 1 to AR 385-40 and EM 385-1-1. Any mishap will be reported on ENG Form 3394, Accident Investigation Report.

(a) For anomaly avoidance and standby support projects on Formerly Used Defense Sites (FUDS), the senior UXO-qualified person on-site is responsible for mishap reporting. For subsurface removal projects in support of construction activities at FUDS, the contractor's UXO Safety Officer (UXOSO) is responsible for mishap reporting. For contracts under the supervision of the district, mishaps will be reported to the district safety office. An information copy of the accident report will be forwarded to the MM CX. USACE district personnel will report through command channels to the HQUSACE Safety and Occupational Health Office.

(b) On active installations, the installation safety officer is responsible for reporting any explosive mishaps.

(c) RCWM Incidents. Chemical event reports are required to be submitted in accordance with AR 50-6. Reporting requirements are identified in EP 75-1-3. A site-specific POC will be identified and documented in accordance with the reporting requirements listed above.

(2) Investigation Requirements. In the event of a mishap, the contractor shall implement emergency procedures and secure the scene to keep unauthorized persons away for their protection and to preserve the evidence for the subsequent mishap investigation. On active installations, the U.S. Army Safety Center (USASC) maintains the prerogative to investigate Class A or Class B explosive mishaps (as defined in AR 385-40). If USASC chooses to investigate, it is the lead agency. If USASC chooses not to investigate, then the district is the lead agency.

3-12. Hazardous Waste Manifest.

a A hazardous waste manifest (EPA Form 8700-22) is required when transporting MEC over public roads. Information guidance on the hazardous waste manifest is provided in 49 CFR 172.205 and 40 CFR 262.20.

b Government personnel who are tasked to certify MEC on hazardous waste manifests will be trained in accordance with the requirements of DOD 4500.0-R, Defense Transportation Regulation, Part II, Cargo Movement, Chapter 204, Paragraph D.1.b. or D.1.e.

c The MM CX is available to assist with the proper identification of MEC on the hazardous waste manifest. In addition to the MM CX, the following personnel, based on their knowledge and training, may assist with proper identification; any USACE OE Safety Specialist, contractor UXO Technician, or Military EOD Technician.