CHAPTER 7

RCWM Response Action Plans

7-1. Introduction.

a. The project plans (CSP, CSS, Work Plan, and supporting plans) are the basis for the RCWM response action. If a determination of applicability of the Interim Guidance indicates that the probability of encountering RCWM is seldom or unlikely and the District is willing to assume the risk, then a CSS is not necessary.

b. The RCWM CSP will be used to describe the project's background and proposed general approach and procedures to address the scope of the RCWM project. This plan will be developed and approved before the remaining project plans are initiated if the PDT determines the CSP is required for the project.

c. The RCWM CSS will be used to provide RCWM response action safety criteria for approval by Army Safety and DDESB.

d. The Work Plan (including the SSHP and supporting plans) provides the specifications for conducting work activities at a RCWM project. It details the scope of the project, the planned work activities, the potential site hazards, and the methods of controlling the hazards. A CSS is required when response activities will be performed (e.g., surface removal of RCWM, excavations when the intent is to uncover, characterize, and remove geophysical anomalies and burial locations that have the potential to be RCWM items).

e. The CW-DC is the only USACE office authorized to prepare these plans. The CSS is normally prepared by the CW-DC with input from other agencies.

7-2. Contents.

a. CSP.

(1) The PDT will determine whether a RCWM CSP is required for the initiation of a new RCWM response action. If required, the CSP will be prepared following the site visit. The following information will be included:

(a) Project Authorization.

(b) Purpose and Scope.

(c) Work Plan Organization.

(d) Project Location.

(e) Site Description to include site location, topography, climate, vegetation, and site geology.

(f) Site History.

(g) Current and Projected Land Use.

(h) Previous Investigations.

(i) Initial Summary of RCWM Risk (summarize RCWM potentially on-site, and characteristic hazard presented by those items).

(j) Project Objectives.

(k) Organizational Roles.

(l) Site Characterization Goals.

(m)Site Characterization Procedural Overview.

(n) RCWM Sampling Locations.

(o) RCWM Sampling Procedures.

(p) Surveying, Non-intrusive Investigations and Site Control.

(q) Intrusive Investigation Operations. The Contractor shall describe proposed operations necessary for completion of this response action.

(2) The CSP will be prepared IAW contract requirements. Generally, the CSP will discuss the topic areas provided above. If the topic area is not required for a particular project, the chapter will be included in the CSP with a declaration that the information is not required for the project.

b. Work Plan. Additional information regarding Work Plans may be found on the MM CX website at http://www.hnd.usace.army.mil/oew.

(1) A Work Plan is required for all RCWM projects. Following the approval of the CSP, if one is required by the PDT, the Work Plan will be prepared to describe the methodology for accomplishing the RCWM response action.

(2) The Work Plan will be prepared IAW contract requirements. These work plans are prepared in the same manner as conventional MEC plans as described in EM 1110-1-4009. However, they will include the additional chapters listed below. If a topic area is not required for a particular project, the chapter will be included in the Work Plan with a declaration that the information was not required for the project.

(a) MCE.

(b) EZ.

(c) Contingency Plan.

(d) Intact Containers Monitoring and Disposal.

(e) IHF Siting Plan.

(f) Physical Security Plan.

c. SSHP.

(1) Prior to performing on-site work, a SSHP will be prepared IAW the requirements of 29 CFR 1910.120(b)(4), 29 CFR 1926.65(b)(4), ER 385-1-92, and ER 385-1-95.

(2) The SSHP will be prepared IAW contract requirements. The SSHP will discuss the topic areas provided below.

(a) Introduction. A reference to the Work Plan is sufficient to direct readers to detailed information on the site description; project scope and objectives; and staff organization, qualifications and responsibilities.

(b) Staff Organization, Qualifications, and Responsibilities.

(c) Activity Hazard Analysis and Risk Assessment per task.

(d) Training.

(e) Personal Protective Equipment.

(f) Medical Support.

(g) UXO Safety.

(h) Radiation Dosimetry.

(i) Environmental and Personnel Monitoring.

(j) Site Control.

(k) Personnel and Equipment Decontamination.

(l) Emergency Response and Contingency Procedures (on-site and off-site).

(m)Confined Space Entry.

(n) Spill Containment.

(o) Site Description and Contamination Characteristics.

(p) Heat/Cold Stress Monitoring.

(q) Standard Operating Procedures (include as a separate document).

(r) Accident Prevention.

(s) Logs, Reports, and Record Keeping.

(3) This outline presents the subcomponents required for each of the topic areas listed above. Chapter 8 of this pamphlet provides more detailed information on the safety considerations for RCWM response actions.

d. Supporting Plans. This section discusses the supporting plans required in the Work Plan. These plans, which are prepared by government agencies, include: TEU Assessment Plan; Air Monitoring and Analysis Plan; Environmental Media Sampling and Analysis Plan; Public Evacuation or Shelter-in-Place Plan; and PMNSCM Plans. At the time a SOW is

provided to the contractors, a SOW is issued to TEU, ECBC (or equivalent support organization), and PMNSCM to initiate the preparation of the supporting plans. Supporting plans can be provided in a separate volume from the Work Plan.

(1) TEU Operations.

(a) This plan is prepared by the TEU and includes their standard operating procedures (SOPs), Operational Orders, and specific equipment operations manuals that will be used to support the cleanup efforts.

(b) TEU's responsibilities generally include the following tasks:

- Coordinate and provide input to the Work Plan.
- Calculate the downwind hazard areas using D2PC.
- Aid contractor in the excavation activities within the EZ when non-MEC items are being excavated.
- Assess munitions with unknown fillers.
- Package munitions with unknown fillers.
- Transport munitions with unknown fillers.

(c) SOPs for Specific Items. The following SOPS, as applicable, must be located on-site:

- EOD Response to Ordnance Items.
- Use of the Portable Isotopic Neutron Spectroscopy (PINS).
- Use of the Raman spectrometer.
- Packaging.
- X-Ray Procedures.
- Assessment/reassessment.

(2) Air Monitoring and Analysis Plan. The Air Monitoring and Analysis Plan will describe air monitoring and analysis methodologies for chemical agent and, if required, industrial chemicals, and will discuss the following topics:

(a) Purpose, scope, and objectives of sampling and analysis.

(b) Responsibilities of the air monitoring and analysis personnel.

(c) Monitoring and analysis terms.

(d) Terms.

(e) Types of monitoring to be used.

(f) Monitoring/analysis procedures, including:

- Process controls.
- Near real time monitoring.
- Confirmation/historical monitoring.
- Soil headspace analysis procedure.
- Headspace analysis procedures for scrap, PPE, and bulk items
- Background (general area) monitoring.

(g) Monitoring record maintenance.

(h) Quality control.

(3) Environmental Media Sampling and Analysis Plan. The Environmental Media Sampling and Analysis Plan will describe sampling methodologies for sampling and analysis of environmental media for chemical agents and degradation products, and will discuss the following topics:

(a) Purpose, scope, and objectives of environmental media sampling and analysis.

(b) Responsibilities of the air monitoring and analysis personnel.

(c) Sampling/analysis procedures, including:

- Analytes of concern.
- Analytical methods and procedures.
- Quality control.
- Data reporting.
- Sampling/analysis record maintenance.

(4) Public Evacuation or Shelter-in-Place Plan. The USACE District, in close coordination with the CW-DC, will be responsible for these plans, as necessary. These plans will discuss the logistics of evacuation and alarm procedures, as required.

(5) PMNSCM Plans. The PMNSCM Plans are composed of the following sub-plans:

(a) IHF Plan. The IHF Plan will address all matters concerning the temporary storage of recovered RCWM. This includes the physical location, design, physical security, equipment requirements, personnel training requirements, monitoring requirements, descriptions of all necessary activities required during operation, and surveillance requirements.

(b) Transportation Plan. The Transportation Plan will address all transportation matters concerning the movement of the RCWM item(s) from the EZ to the IHF and from the IHF to the final destination point.

(c) Disposal Plan. The Disposal Plan will be provided by PMNSCM for the CSS.

e. Chemical Safety Submission. A detailed outline for the CSS is provided in Appendix C.

(1) The CSS is intended for this document to be a “stand-alone” document from the Work Plan and other supplemental plans for the project.

(2) This plan is based on the Work Plan and supplemental plans, so those plans must be complete before the CSS can be completed. The overall length of the plan shall not exceed 50 single-sided pages.

(3) The CSS is intended to provide those reviewing and approving agencies the necessary technical information, as required in the DA Interim Guidance of 1997. This outline has been agreed to by USAESCH and USATCES. No substantive changes will be made without the approval of the MM CX.

(4) Document control is positively essential during the drafting, editing, and publishing of this CSS. Each page must have a footer that identifies the document, either original date or date of the latest change. Additionally, a sheet shall be inserted into the front of the document that specifies the latest dates and changes. All changes to the original document will leave the bars in the outside margins to identify change locations throughout the document.

(5) It is intended for this document to include the necessary information required for an ESS as well, should it be necessary for the conduct of site operations for the RCWM activities.

(6) The CSS will contain an Executive Summary and the following chapters:

(a) Introduction.

(b) Sampling Plan Summary.

(c) Air Monitoring Plan Summary.

(d) PPE and Decontamination Summary.

(e) Medical Support Summary

(f) Public Protection Plan Summary.

(g) IHF Siting Plan Summary.

(h) MEC Transportation Plan Summary.

(i) RCWM Transportation Plan Summary.

(j) Engineering Controls Summary.

(k) Post-Recovery Assessment Activities Summary.

7-3. Review and Approval. Coordination, review and approval of CSSs and corrections or amendments to CSSs will be submitted IAW DACS-SF Memorandum, Approval of Safety Submissions for Non-Stockpile Chemical Warfare Materiel (RCWM) Response Activities, 29 Feb 00. A flow chart summarizing the review/approval process and timeline for CSSs is shown in Figure 7-1.

7-4. Amendments. Amendments to CSSs shall be signed by the same signatories (offices or agencies) as the original CSS.

7-5. Corrections. Corrections to CSSs are those changes that do not adversely affect worker or public safety. Corrections are typically administrative changes and will be initiated by the MACOM with overall responsibility for the CWM activity. Corrections require coordination with all support agencies and are approved by the MACOM with overall responsibility for the CWM activity. Copies of the corrections will be provided for information to all support agencies, USATCES, DA Safety, and DDESB.

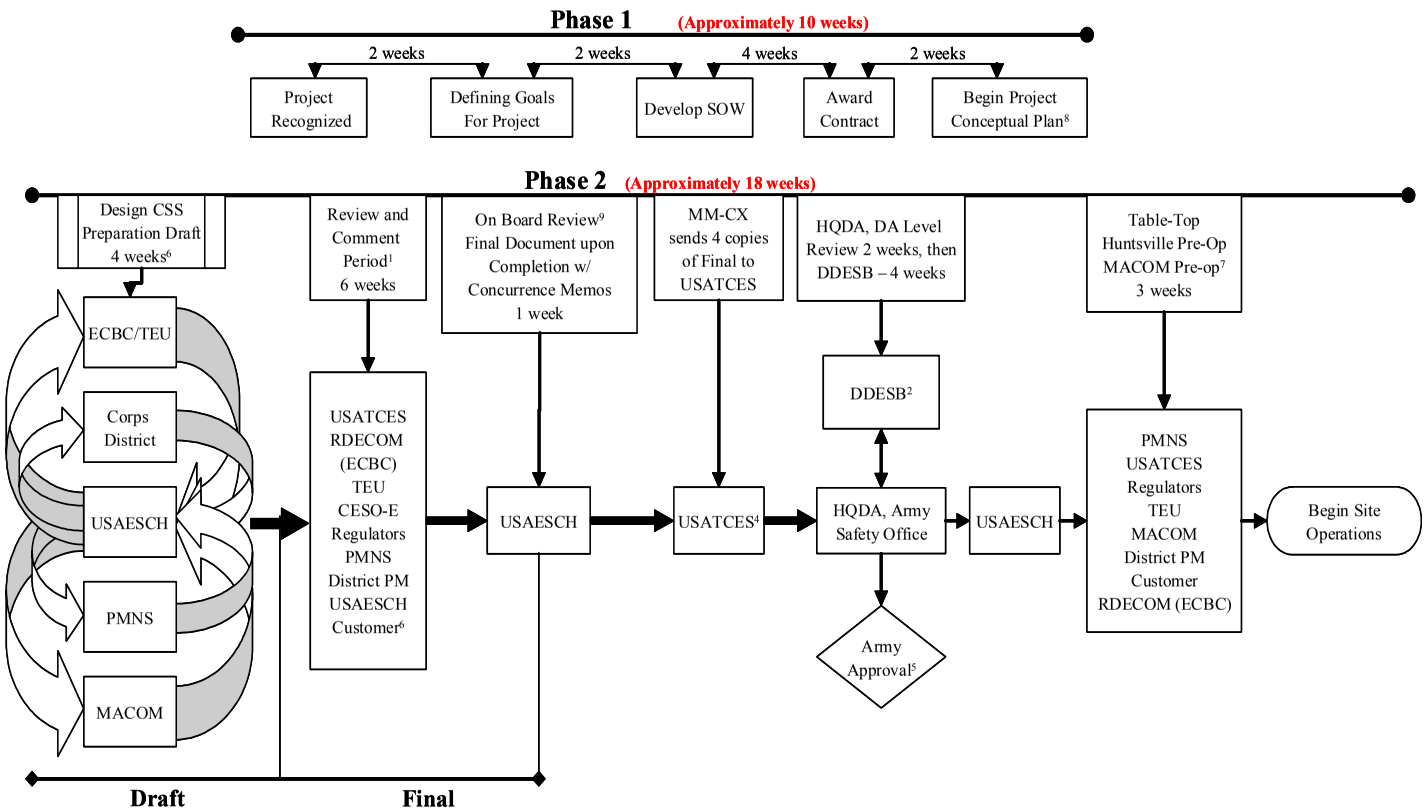

Figure 7-1. Flow Chart and Timeline for Chemical Safety Submissions for RCWM Projects

Notes:

1. Review and comment.
2. DDESB Reviews and approves on Active Installations, and provides concurrence on FUDS.
3. Final Document to USATCES (4 copies) 60 days prior to start of work (include written concurrences from TEU, ECBC, PMNS, and District)
4. USATCES will send copies to DDESB and DA Safety for final review and approval
5. Once final approval has been granted, PMNS may take the CSS to DHHS for concurrence.
6. Work for BRAC, IR, and Others will have the Installation, MACOM Safety Office, and appropriate service Staff involved in the process as well.
7. The USAESCH Table Top and Huntsville Pre-Op may be conducted during the last two weeks the CSS is at DDESB awaiting approval, MACOM Pre-Op will be conducted the week following DA approval.
8. Ensure USATCES involvement in the project at the Conceptual Site Plan Phase I.
9. USAESCH will host an On Board Review (OBR), this review will replace the Draft Final stage of the CSS. Attendees at the OBR need to be individuals that can make decisions for the agency involved. The intent is to come out of the OBR with a Final Document and signed copies of the concurrence memos and to send the CSS directly to USATCES/DA.