Operations and Standards Committee

NAOC Board of Directors Meeting
June 12, 2018

OSC Overview

- Operations and Standards Committee details
 - Comprises 48 members from 28 companies
 - Increased by 8 members since January
 - James Salisbury, Chair
 - Bill Brown, Deputy Chair
- Regular meetings
 - First Wednesday of each month, 1:00 pm CST
 - Next meeting is July 5, 2018 (reschedule)
- Work closely with Technology Committee

OSC Mission and Objectives

Mission

 Advise government agencies on MR operations and standards issues in areas of personnel, safety, training, and technology

Objectives

- Provides open forum for member discussion
- Reviews guidance so we can offer industry comments
- Organizes technical webinars to promote information sharing within industry
- Distributes guidance and technical documents from government partners to member organizations

How Does OSC Achieve Its Objectives?

- Monthly conference calls
 - Discuss ongoing OSC tasks
 - Raise new issues and assign new actions
 - Form "Tiger Teams" to manage tasks
- Distribute government document releases
- Receive and coordinate guidance reviews
- Organize technical webinars
 - In collaboration with NAOC Technology Committee



Status of OSC Actions

- OSC Document/Guidance Reviews
 - Review of Munitions Response QAPP
 - QC Criteria for Analog Surveys
- NAOC-sponsored M2S2 Webinar(s)
 - Joint effort with Technology Committee
- UXO Technician Log Books
 - New item

OSC Document/Guidance Reviews Review of MR-QAPP

- Munitions Response Quality Assurance Project Plan (MR-QAPP)
- Drafted by DoD Environmental Data Quality Workgroup (EDQW)
 - Lead is Jordan Adelson
- NAOC given opportunity to review Interim Draft QAPP
 - Received in February; suspense date for comments was April 2
 - Interim Draft included six worksheets only (plus Appendix A)
 - WS #09: Project Planning
 - WS #10: Conceptual Site Model (CSM)
 - WS #11: Data Quality Objectives (DQOs)
 - WS #12: Measurement Performance Criteria (MPCs)
 - WS #17: Sample Design
 - WS #22: Measurement Quality Objectives (MQO)

OSC Document/Guidance Reviews Review of MR-QAPP, cont'd.

- Review was coordinated through OSC with support from Technology Committee
- Received 290 comments from 9 member firms
- Comments were collated and returned on April 2
- NAOC President proposed follow-up discussion on comments with EDQW
 - No response to date
- NAOC expects to see a draft MR-QAPP with all worksheets for review in future

OSC Document/Guidance Reviews Review of MR-QAPP, cont'd.

- General comment themes
 - QAPP template versus RI guidance document
 - Document introduces new terms, concepts, and document deliverables appropriate in work plan template?
 - If intended as RI guidance document, how is this new way of doing business going to be communicated to all parties (contractors and government)? If/when costs rise, will everyone understand why?
 - Uses copious "example text" in lieu of specific guidance/requirements
 - One size does not fit all for MMRP projects selected example is only one site
 - Minimum requirements are easier to understand, easier to implement on all sites, and easier to improve upon

OSC Document/Guidance Reviews Review of MR-QAPP, cont'd.

- General comment themes, cont'd.
 - Inconsistency of recommended RI approach with FFP task order requirements
 - Template is prescriptive on means and methods inconsistent with FFP and PBC
 - Phased approach preferred from a scientific standpoint, but challenging to bid competitively under FFP w/o contractors taking on significant risk
 - Unless contractors willing to assume large risks, change orders almost guaranteed in later work phases (unless PWSs are structured in a new way) are all parties aware of this?
 - Very heavy focus on DGM over analog technology
 - Implies DGM is almost always possible/practical; while obviously preferred, there are safety and cost issues to consider as well as data quality issues
 - Large amounts of seeding in difficult terrain is challenging for safety and is expensive
 - "Appendix A" was a diatribe against analog surveys

OSC Document/Guidance Reviews Review of Analog QC Criteria

- EM 200-1-15 details performance criteria for analog surveys during RI and RA
 - Tables 11-4 and 11-6
- EDQW contacted NAOC in Oct 2017 to request input on analog QC criteria
 - To support MR-QAPP development

OSC Document/Guidance Reviews Review of Analog QC Criteria, cont'd.

- OSC requested member comments in Oct 2017
- > 60 comments were received by end of Nov
- Comments were compiled and reviewed
 - There were some contradictions between comments
 - Decision made to resolve contradictions before sending back to EDQW
 - Jordan Adelson concurred with this decision

OSC Document/Guidance Reviews Review of Analog QC Criteria, cont'd.

- Tiger Team Members
 - OSC: Wayne Martrildonno, Andreas Kothleitner, Meghan Donohue, James Salisbury
 - Technology Committee: Kent Boler, Dean Keiswetter, Jeff Leberfinger
 - Designated Hitter: Woog
 - Many thanks to all!
- After many emails and discussions, comments were returned to EDQW on May 1
 - No feedback received to date



OSC Document/Guidance Reviews Review of Analog QC Criteria, cont'd.

- Comments on almost all performance criteria, but overarching comment theme
 - Recognize analog detection methods are most often used in areas where DGM cannot be used
 - Don't try to enforce same standards on both technologies
- Not hopeful this will be well received

OSC Document/Guidance Other Documents

- Distributed to membership
 - NAVFAC OPSNOTE 2017-004
 - QASP for projects on Guam
 - ITRC guidance: Quality Considerations for Multiple Aspects of Munitions Response Sites
 - For regulators/stakeholder to support work plan reviews
 - Several NAOC members on ITRC team
 - Army Decision Document Guidance, June 2018
 - Determines appropriate approval authority for DDs

NAOC-sponsored M2S2 Webinar

- Supporting USACE with M2S2 webinar on June 14
 - This Thursday
- Joint effort with Technology Committee
- Theme: Application of Innovative Technologies to MMRP Projects
- Six presentations including
 - Drones (2), robotics (2), chemical destruction of explosives, and smart characterization
- USACE requested support with another M2S2 webinar in October 2018

UXO Technician Log Books

- Several member firms have had recent issues with personnel being rejected by CEHNC
 - Enforcing new standards for log books/experience
- OSC has begun discussing issue
 - Army has different requirements to everyone else
 - USACE Districts do not have consistent requirements
 - Requirement for USACE database unclear
- Work towards uniformity
 - Log book format on NAOC web site

Ongoing Information Exchange

- OSC will continue its successful partnerships with the HQDA, EM CX, NOSSA, and NAVFAC
- These partnerships have helped to provide clarification on operational questions from our membership
- OSC will continue to distribute information and guidance updates to NAOC's membership



Questions or Comments?

Chair, Operations and Standards Committee

James Salisbury

Office: (512) 719-6028

James.Salisbury@Parsons.com