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4 Project Responsibilities

For a given MR project, specific roles and responsibilities must be assigned with respect to quality. These roles include the PDT, lead DOD agency, lead regulatory agency, and the MR contractor.

4.1 Project Delivery Team

The PDT includes the lead DOD agency project manager, technical experts within or outside the service's activity, regulators, specialists, consultants/contractors, stakeholders, and representatives from other federal and state agencies. The expertise and disciplines of the people on the PDT depend on the nature and phase of the project. Some technical disciplines to consider, depending on need, may include biology, chemistry, hydrology, hydrogeology, geology, risk assessment, environmental engineering, geophysics, geographical information systems (GIS) and mapping, UXO safety, and industrial hygiene. Other specialty areas may include contracting, legal, public affairs, real estate, health physics, cost estimation, regulatory compliance, and archeology.

Achieving consensus decisions that include input from all members of the PDT is critical. The penalty for ineffective planning often is greater conflict and extensive reworking, which results in increased cost and lost time. Therefore, the personnel involved for each entity represented should be authorized to make decisions for their respective organizations. It is also critical that organizations involved be fully engaged in the planning process and review and accept or sign the appropriate documentation with respect to their organizational policy.

In addition, it is important to identify and gather input from any other affected stakeholders who are not part of the formal PDT. For example, these stakeholders could provide valuable information regarding past or current land use at the site.

4.2 Lead DOD Agency

For the purposes of this document, responsibilities for government oversight are divided between the activities conducted by the lead agency (DOD oversight) and those conducted by state and federal regulators (regulatory oversight). Specific roles, responsibilities, and activities involved in government oversight should be agreed upon during project planning, documented in the QAPP, and included in the project schedule.

The DOD component performing as the lead agency for the MR project and their contractor are responsible for designing, funding, and implementing the MR project including performing QA and QC.

DOD oversight occurs on several levels. Oversight activities typically include contract compliance monitoring, project planning, contractor accreditation oversight, quality assurance, on-site observation and assessments, data validation, a DUA, and independent technical review of documents.

4.3 Lead Regulatory Agency

The regulator on an MR project ensures that the project complies with pertinent state and federal rules and regulations and meets the requirements for characterization, cleanup, and site closure. Regulatory concurrence depends on the quality of site characterization and cleanup efforts. Consequently, regulators should be involved early in determining project objectives and quality requirements, as well as in establishing the quantity and quality of data needed to support a decision.

The lead regulatory agency, which performs regulatory oversight, should participate in the systematic planning process, including development of project objectives and DQOs. This involvement ensures agreement with key processes and performance requirements regarding necessary QA/QC activities. Regulatory participation in the planning process helps to secure regulatory acceptance of key processes; type, quantity, quality, and usability of data; and acceptable characterization and remediation of MRSs. Key agreements and decisions reached among the lead agency and regulators means that the highest quality of work is implemented, project schedules are met, and project final decisions are made on time.

The level of involvement by regulatory agencies during field activities and data processing efforts varies across agencies and is dictated largely by resource constraints. Thus, ongoing communication with regulators is extremely important. The timing, frequency, responsibilities, and format of regulatory communication should be agreed upon during project planning, built into the schedule, and documented in the QAPP. Regulatory involvement during field activities depends on the timely reporting of QC/QA activities, interpretations of the data, and access to the site. Regulators, in their roles as QA representatives, are granted access to the exclusion zone as authorized visitors per EM-385-1-97 (USACE 2008). For Navy sites, Naval Ordnance Safety and Security Activity (NOSSA) Instruction 8020.15 Series allows authorized visitors such as regulators. Authorized visitors must obtain written approval prior to access from the appropriate project safety authority. The QAPP should provide guidance on additional steps for identifying authorized visitors. Timely communication and response across agencies is critical at established points during field activities to ensure sufficient review time of field data.

4.4 MR Contractor

For the purposes of this document, the MR contractor is defined as the entity performing the project activities, whether through a direct contract or as a subcontractor to another commercial firm. As part of the PDT, the MR contractor is responsible for project activities that are defined in the contract requirements. Examples of MR contractor activities include:

- development of the technical approach during the planning stage (QAPP development).
- facilitation of planning and public outreach meetings.
- site preparation such as vegetation removal and installation of the IVS and blind seeds.
- geophysical data acquisition and analysis.
- explosives Safety Submission (ESS).
- removal of surface and/or subsurface UXO/DMM.
- technical reporting including DUAs.

During the planning stage, the MR contractor must ensure that the technical approach is consistent with the stated project objectives, particularly with respect to detection performance. The MR contractor also ensures that the MPCs and MQOs derived in support of the project objectives are reasonably achievable, using the SOPs developed to guide the project activities.

During the project, the MR contractor conducts project activities in accordance with the approved SOPs and monitors performance against the project MPCs and MQOs. Many field projects vary from the original plan. Isolated failures to meet MQOs are to be expected. As part of this process, it is critical that the MR contractor operates with complete transparency and can present QC test results accurately and on time. Transparency is maintained by producing QC reports that summarize the performance against the MQOs in a concise, accurate, and comprehensive manner. Where specified by the QAPP, QC failures trigger a root cause analysis and corrective action. From a project perspective, the corrective action must mitigate the effect of the error on the usability of the data.

Project reporting must summarize the project activities (including performance against the quality metrics), discuss the effect of any quality shortcomings on the usability of the data, and draw defensible conclusions from the data.

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