



DEPARTMENT OF THE NAVY
WESTERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
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ALAMEDA POINT
SSIC NO. 5090.3

5090
Ser 1813BD/0087
12 MAY 1989

From: Commander, Western Division, Naval Facilities Engineering Command
To: Distribution
Subj: REMEDIAL INVESTIGATION/FEASIBILITY STUDY AT NAVAL AIR STATION, ALAMEDA
Encl: (1) Final Health and Safety Plan
(2) Navy Responses to Department of Health Services Comments on NAS Alameda Health and Safety Plan

1. Enclosure (1) is our Final Health and Safety Plan (HSP) for the Remedial Investigation/Feasibility Study at the Naval Air Station (NAS) Alameda. Enclosure (2) is a summary of the Navy Responses to the Department of Health Services (DOHS) comments on the HSP. These comments have been incorporated in the final HSP.

2. We believe that the Final HSP is consistent with the comments provided by DOHS as well as applicable federal, state, and local guidance. Also, the Final HSP is intended to satisfy the substantive state requirements referenced in Section 5.1.2.5 of the Remedial Action Order (Docket No. HSA 88-89-051).

3. If you feel that the Final HSP does not adequately reflect DOHS comments or is not consistent with applicable guidelines, please advise us within fifteen days of the date of this letter.

4. Thank you for your guidance and involvement in this HSP. Please direct any questions to Commander, Western Division, Naval Facilities Engineering Command (Attn: Ms. Bella G. Dizon, Code 1813BD, Autovon 859-7512 or Commercial (415) 877-7512).

RICHARD SERAYDARIAN
By direction

Distribution:
Environmental Protection Agency, Region IX (Attn: Nick Morgan)
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Copy to:
NAS Alameda (Attn: Randy Cate)
Canonie Environmental (w/o encl)

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ENCLOSURE 1

REVISED FINAL
HEALTH AND SAFETY PLAN

DATED 01 MAY 1989

IS ENTERED IN THE DATABASE AND FILED AT
ADMINISTRATIVE RECORD NO. **N00236.000351**

NAVY RESPONSES TO DEPARTMENT OF HEALTH SERVICES COMMENTS
ON THE HEALTH AND SAFETY PLAN

REMEDIAL INVESTIGATION/FEASIBILITY STUDY
NAVAL AIR STATION, ALAMEDA
ALAMEDA, CALIFORNIA

Comment 2a

What type of sound level measuring devices are to be used to evaluate employee exposures?

What sampling strategy will be used?

Response

Noise monitoring will be conducted initially with a device known as a sound-level meter, a direct-reading noise monitoring instrument that measures sound pressure level in decibels (dB) weighted on the "A" scale (dBA). Work areas will be surveyed and mapped with corresponding sound pressure levels obtained from these devices. In all areas yielding sound pressure levels greater than 85 dBA designated personnel may be required to wear dosimeters, to more closely monitor employee noise exposure. The dosimeter will yield an 8-hour time-weighted average (TWA) of sound pressure levels and a percent dose of the permissible exposure limit (PEL). All 8-hour TWAs at or above 85 dBA will trigger the implementation of a hearing conservation program consistent with 29 CFR 1910.95(c).

Comment 2d

The response (referring to December 19 comment "The PPE selection program does not meet all the requirements in 29 CFR 1910.120(g)(5).") is not relevant to 29 CFR 1910.120(g)(5). This section addresses the entire protective ensemble (skin and respiratory protection), selection, use, decon, and its maintenance and storage. 29 CFR 1910.134 addresses only respiratory protection.

Decon and storage of respirators and PPE clothing is unclear, especially if level B protection is to be used. Substances such as heavy metals and pesticides require special care and attention in this area. Where and how are the respiratory protection devices to be stored?

Response

Section 6.0 of the Site Safety Plan [SSP (ie, Health and Safety Plan)] has been revised to clarify Canonie's PPE program, and includes PPE clothing as well as respiratory PPE. This section uses U.S. EPA's Standard Operating Safety Guide, July 1988, as a reference.

Respiratory PPE will be stored in a cool, dry place, away from sunlight, dust, damaging chemicals, and impact. This is addressed in the revised Section 6.0. Decon of PPE is addressed in the revised Appendix E, Section 2.0, entitled "Sample Doffing Procedures," and uses the NIOSH/OSHA/EPA/USCG "Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities," October 1985, as a reference.

Comment 4b

Section 5.0 is titled "Air Monitoring," but includes radiation (and presumably noise) monitoring. Since these are physical rather than chemical hazards, the title should be renamed. "Employee Monitoring" or "Monitoring" would be more appropriate. Although the response to the previous comments said a revision was made to show calibration of noise monitoring equipment, nothing related to noise is mentioned in this section.

Response

Section 5.0 formerly entitled "Air Monitoring" has been renamed "Air, Radiation, and Noise Monitoring" and all references made relating to noise monitoring equipment calibration are included in Appendix I of this SSP.

Comment 4c

As stated in the November 16 DHS comments, the calibration procedures for each piece of monitoring equipment should be established as an SOP and attached as an appendix to the SSP.

Response

Appendix I has been added to the SSP and includes SOPs for calibration of each piece of monitoring equipment.

Comment 7c

Nothing in Appendix D addresses monitoring equipment calibration.

Response

All information regarding calibration of monitoring equipment will be included in Appendix I.