

DEPARTMENT OF TOXIC SUBSTANCES CONTROLREGION 2
7700 TWIN AVENUE, SUITE 200
BERKELEY, CA 94710-2737

(510) 540-3724



October 19, 1994

Commander
Western Division
Naval Facilities Engineering Command
Attn.: Mr. George Kikugawa
Code 09ER3GK
900 Commodore Drive
San Bruno, California 94066-2402

Dear Mr. Kikugawa:

SITE 15 REMOVAL ACTION HEALTH AND SAFETY PLAN DRAFT, NAVAL AIR STATION, ALAMEDA

The California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) has reviewed the draft Health and Safety Plan (H&SP) for the Remedial Action at Site 15. The following are the comments of the DTSC. These comments were prepared by DTSC staff Industrial Hygienist in our Office of Scientific Affairs.

1. Page 3-6, Section 3.2.15

Please provide a concise description (narrative) of the primary health risks associated with the chemical contaminants present or expected. Include information such as routes of entry, target organs, acute and chronic effects, etc. This narrative may be augmented by a quick reference chart.

Reference: Title 8, California Code of Regulations (CCR), Section 5192(b) and (c).

2. Page 4-5, Section 4.8

Please describe how the tagging procedure will be sufficient and effective to meet requirements of Title 8, CCR, Section 3314(c) when tags alone are allowed due to equipment not accepting locks.

3. Section 6.0

Please provide a site map identifying areas of exclusions, contamination reduction, support zones, and decontamination.

Reference: Title 8, CCR 5192(d)

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4. **Page 9-1, Section 9.1**

Please refer to California Code of Regulations when identifying OSHA standards. As an example: Title 8 CCR 5192, rather than 29 CFR 1910.120 (Labor Code Section 6303.5).

Reference: California Labor Code Section 6303.5

5. **Page 12-3, Section 12.4**

Please provide a description of emergency eyewash units(s) sufficient to verify conformance with ANSIZ358.1 - 1981.

Reference: Title 8, CCR 5192(d)

If you have any questions regarding this letter, please call me at (510) 540-3809.

Sincerely,



Thomas P. Lanphar
Project Manager
Base Closure Branch

cc. Mr. James Nusrala
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

Lt. Mike Petouhoff
Base Environmental Coordinator
Alameda Naval Air Station
Building 1, Code 52
Alameda, California 94501

Mr. James Ricks
U.S. Environmental Protection Agency
H-9-2
75 Hawthorne Street
San Francisco, California 94105