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MCAS EL TORO  
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**TO:** Jason Ashman, RPM (3 copies)  
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Naval Facilities Engineering Command  
Southwest Division  
1220 Pacific Highway  
San Diego, CA. 92132-5187

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**FROM:**

D. K. Cowser, Project Manager

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Phase II RI/FS, MCAS El Toro, California  
CTO-0059

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J. Jimenez, Cal EPA (2)\*  
J. Joyce, El Toro (3)\*  
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7-19-95

**RESPONSE TO COMMENTS  
HEALTH AND SAFETY PLAN SUPPLEMENT FOR THE  
PHASE II REMEDIAL INVESTIGATION/FEASIBILITY STUDY  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Juan Jimenez Region IV Department of Toxic Substances Control</p> <p><b>To:</b> Joseph Joyce BRAC Environmental Coordinator MCAS El Toro, California</p> <p><b>Date:</b> 10 May 1995</p>	<p><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0059 File Code: 0618</p>
<p><b><u>GENERAL COMMENTS</u></b></p> <p>The Department of Toxic Substances Control (DTSC) reviewed the HASP for compliance with Title 8, California Code of Regulations (T8 CCR), Section 5192: "Health and Safety for Hazardous Waste Operations and Emergency Response" as well as other appropriate State and Federal Occupational Health and Safety Regulations. Please note that in addition to the requirements of this section, the employer is responsible for the implementation of an Illness and Injury Prevention program which is required by the T8 CCR, Sections 1509 and 3203. The requirements of those sections have not been included in this review.</p> <p>An industrial hygienist from OSA-IH may perform a field audit in order to confirm the implementation of the provisions and specifications presented in the HASP.</p> <p>DTSC is unable to foresee all the health and safety hazards in the workplace by the review of the submitted plan. Continuous surveillance of the work-site and creation of an effective health and safety program by the employer will reduce work place injuries and reduce liability.</p> <p>OSA-IH review of the HASP is not a guarantee that it will be properly and safely implemented. HASP implementation is the employer's responsibility. The approval is limited to concurrence that all the required elements of a safety plan are present.</p>	<p><b><u>RESPONSE TO GENERAL COMMENTS</u></b></p> <p>The following are responses to DTSC comments on the Health and Safety Plan Supplement for the Phase II Remedial Investigation /Feasibility Study at MCAS El Toro. If there are any questions or further comments please contact Health and Safety Supervisor Steve Waide at (619) 687-8751 or the Health and Safety Manager, Nevin Thomas, at (619) 687-8711.</p>
<p><b><u>SPECIFIC COMMENTS</u></b></p> <p>The site HASP is intended to be a functional stand alone document. The plan is used to educate and familiarize the on-site workers with the site history, proposed work activities, known or potential health hazards, emergency action plans and the site safety information that is necessary to</p>	<p><b><u>RESPONSE TO SPECIFIC COMMENTS</u></b></p> <p>As stated on page 1-1 in the Health and Safety Plan Supplement (HASP Supplement), the "Supplement is NOT intended to serve as a stand-alone document; it has been prepared for use in conjunction with the following</p>

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<p>mitigate the risks from the identified hazards. Therefore, the final site HASP must be available at all time for on-site personnel to reference.</p>	<p>CLEAN II health and safety documents:</p> <ul style="list-style-type: none"> <li>• Program Health and Safety Plan (January 1994)</li> <li>• Site Health and Safety Plan, Revision 1 (July 1994)</li> <li>• Health and Safety Standard Operating Procedures (SOPs); and</li> <li>• Health and Safety Program Procedures (PPs).</li> </ul> <p>These documents are available at the MCAS El Toro field office.</p>
<p>The document states, "This document refers to specific ....." Section numbering corresponds to ....." Sections in the HASP supplemental do not correspond with the January '94 HASP.</p> <p>The supplemental document's numbering system should correspond to the original document as stated.</p>	<p><b>RESPONSE:</b> As stated on page 1-1 in the HASP Supplement, section numbering parallels the <u>Site Health and Safety Plan</u>. The January 1994 HASP is the <u>Program Health and Safety Plan</u>. The supplement was not intended to parallel the Program HASP but rather the <u>Site HASP</u>. DTSC was provided with all three of these documents for their review</p>
<p>iv. The document states, "Section not modified." For clarification purposes each section should be titled. Provide the title of each section in the index.</p>	<p><b>RESPONSE iv:</b> Comment acknowledged. This issue will be addressed for future plans.</p>
<p>The HASP does not adequately describe the range and matrix of soil contamination. Provide and resubmit.</p>	<p>This HASP Supplement was written for the Phase II <u>Remedial Investigation/Feasibility Study (RI/FS)</u> at MCAS El Toro. The reason this work is being performed is to characterize the site. As is addressed in Section 3.1 of the HASP Supplement, the extent of impacted areas has not yet been determined. The Phase II RI/FS Work Plan does summarize the range of contaminants in various media based on the Phase I RI results. DTSC was provided a copy of the Phase II RI/FS Work Plan.</p>
<p>1-1; 1.4: Standard Operating Procedures (SOPs) and Policy and Procedures (P&amp;Ps) were referenced but not provided for review. Provide a copy of the referenced document for review.</p>	<p><b>RESPONSE 1-1; 1.4:</b> DTSC was issued a controlled copy of the Technical Procedures and Standard Operating Procedures (SOPs) on 23 March 1995 (Reply Reference: PMO-2289). The Health and Safety Program Procedures (PPs) are available at Bechtel San Diego and the MCAS El Toro field office</p>

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	<p>for review. These are contractual documents between SWDIV and Bechtel and have controlled distribution.</p>
<p><b>3-1; 3.2:</b> The document does not specify which 17 sites are scheduled for hollow stem auger boring. (T8 CCR 5192 (b) (4) (A) 4.) Clarify and resubmit.</p>	<p><b>RESPONSE 3-1; 3.2:</b> For the purpose of Safety and Health review, intrusive work should be considered to be conducted at ALL listed sites, whether it is hollow-stem auger borings, air rotary borings, soil gas probes, or other intrusive sampling as indicated in the Phase II RI/FS Field Sampling Plan.</p>
<p><b>3-2; 3.4:</b> Provide an estimate of the number of employees for each major task listed in Table 3-1. (T8 CCR 5192 (b) (2) (A) 4.) Provide and resubmit.</p>	<p><b>RESPONSE 3-2; 3.4:</b> The quantity of personnel for each of these tasks will be determined by the individual subcontractors, based on the scope of work being performed and the manpower requirements to complete the work. At this time, subcontractors have not been selected. The Safety and Health requirements remain unchanged, regardless of the quantity of workers. The actual personnel will be designated at an orientation with CLEAN II and subcontractor field personnel.</p>
<p><b>5-1; 5.2.1:</b> Provide details of the heat stress management program which includes monitoring methods and criteria and work/rest procedures. Prove and resubmit. (Note: NIOSH/OSHA/USCG/EPA Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities, October 1985 is an appropriate reference.) Also, if this is part of your corporate P&amp;P, provide the P&amp;P.</p>	<p><b>RESPONSE 5-1; 5.2.1:</b> Protocols for heat-related monitoring is described in Section 6.3.8 of the Site Health and Safety Plan which was provided with the HASP Supplement for review. Heat stress monitoring is initiated whenever personnel are wearing semipermeable or impermeable protective clothing and the outside temperature reaches 70 degrees F. Signs and symptoms of heat stress are discussed in site specific orientation given prior to fieldwork. Health and Safety SOP 5.1.17, "Heat Stress Control and Evaluation" provides the guidance for heat stress monitoring.</p>
<p><b>5-1; 5.2.2:</b> Provide details of how alpha, beta, and gamma radiation levels will be differentiated. (Note: the quality factor of alpha is 20.) (T8 CCR 5192 (b) (4) (B) 5.) Provide and resubmit.</p>	<p><b>RESPONSE 5-1; 5.2.2:</b> Program instruments can easily separate alpha, beta and gamma activity. This HASP Supplement was not intended to provide training on radiation detection or industrial hygiene instrumentation. Site Health and Safety Officers are thoroughly familiar with their operation.</p> <p>The quality factor of alpha radiation is irrelevant to surface activity</p>

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	<p>measurements and this plan. As alpha radiation presents only an INTERNAL hazard, it would be inaccurate and misleading to convert alpha surface activity to REM.</p>
<p><b>5-7; 5.2.9:</b> This section states level C will be worn at Sites 2, 5, 9, 16 &amp; 17. Section 11.1 indicates Sites 2, 3, 5, 9 &amp; 16 will require Level C. The two sections are not consistent. (T8 CCR 5192 (b) (4) (B) 3.) Clarify and resubmit.</p>	<p><b>RESPONSE 5-7, 5.2.9:</b> Please re-read Section 5.2.9. This section includes Site 3. Site 17 was mistakenly omitted from the plan in Section 11.1 and will be considered a Level C site. In addition, Level C will be required only when intrusive sampling is conducted at the listed sites</p>
<p><b>6-9; 6.3.1:</b></p> <p>1. The document states "Initial noise monitoring.....in accordance with P&amp;P H.S. 3.3: This document was not provided. When and where will noise monitoring be conducted?"</p> <p>2. "Personal dosimeters will be used ...consistently greater than 85 dBA." "Consistently" is a vague term and requires clarifications. (T8 CCR 5192 (b) (4) (B) 5. Clarify and resubmit.</p>	<p><b>RESPONSE 6-9; 6.3.1:</b> The procedure for noise monitoring is described in detail, in Section 6.3.1 of the Site Health and Safety Plan (provided) and CLEAN II Program Procedures HS 3.3 "Hearing Conservation." The Health and Safety Program Procedures (PPs) are available at Bechtel San Diego and the MCAS El Toro field office for review.</p>
<p><b>8-1; 8.3:</b> The HASP fails to provide details of the gross decontamination procedures while in the exclusion zone. This section must address specific radiological concerns, as well as, other chemical hazards. (T8 CCR 5192 (b) (4) (B) 7) Clarify and resubmit.</p>	<p><b>RESPONSE 8-1; 8.3:</b> Personnel Decontamination is discussed in detail in the CLEAN II SOP 4.3.1 "Personnel Decontamination". The protocols for performing emergency decontamination of injured or exposed personnel are listed in detail in the Site Health and Safety Plan (provided), Section 16.5 "Occupational Injuries".</p>
<p><b>8-1; 8.4:</b> The HASP fails to provide details of the decontamination procedures in the contamination reduction corridor. The necessary details include decontamination line explanation and a narrative describing each station. (T8 CCR (B) (4) (b) 7) Provide and resubmit.</p>	<p><b>RESPONSE 8-1; 8.4:</b> Decontamination procedures can be found in great detail in Section 8 of the Site Health and Safety Plan (provided), and in CLEAN II Program Procedure HS 4.3 "Decontamination".</p>
<p><b>8-2; 8.10.2:</b> The IDWMP was referenced as a supporting document but not provided for review. The pertinent sections should be provided</p>	<p><b>RESPONSE 8-2; 8.10.2:</b> The draft IDWMP was issued in November 1994 and reviewed by DTSC. The final IDWMP, which incorporates DTSC</p>

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<p>in appendices for review.</p>	<p>comments, will be submitted in July 1995.</p>
<p><b>6-6; Tables 6-2 and 6-3: Tables 6-2 and 6-3 do not list the permissible exposures level and action levels for the hazards of concern. (T8 CCR 5192 (b) (4) (B) 1) Provide and resubmit.</b></p>	<p><b>RESPONSE 6-6:</b> During this type of fieldwork, qualitative direct reading instruments such as PIDs and FIDs are utilized in the general survey mode. Since the contaminants usually encountered are not positively known at the moment of detection, the Program has developed very conservative action levels to be followed by SHSOs for use with these qualitative instruments (see Table 10-3). The action levels as discussed in Table 10-3 are for gross volatile contaminants and were developed to provide protection for the lowest PELs expected to be encountered. Colorimetric indicator tubes are also used to rule out the presence of highly toxic chemicals. Action levels or PELs for</p>
	<p>INDIVIDUAL contaminants is undesirable unless direct quantitative analysis of airborne contaminants is available in the field and can give an immediate indication of airborne levels of these contaminants.</p>
<p><b>11-2: Full face respirators with organic vapor/HEPA filter cartridges are not acceptable for all organic vapors listed. (T8 CCR 5192 (b) (4) (B) 3) Clarify and resubmit. (Note: When specifying air-purifying respirators, the warning properties must be considered.)</b></p>	<p><b>RESPONSE 11-2:</b> All organic vapors listed DO have adequate warning properties when found in the mixtures suspected to be encountered on site.</p>
<p><b>The HASP does not adequately describe the range and matrix of soil contamination. (T8 CCR 5192 (c) Modify and resubmit.</b></p>	<p><b>RESPONSE:</b> This is a repeated comment. See BNI response above.</p>