



**OHM Remediation  
Services Corp.**  
A Subsidiary of OHM Corporation

**OHM TRANSMITTAL/DELIVERABLE RECEIPT**

**CONTRACT N68711-93-D-1459**

**DOCUMENT CONTROL NO: SW1083**

**TO:**

Commanding Officer  
Naval Facilities Engineering Command  
Southwest Division  
Ms. Gena McClain, Code 0232  
Building 131  
1220 Pacific Highway  
San Diego, California 92132-5187

**Date: 9 Nov 95**

**D.O.: 0024**

**Location: El Toro, Ca**

**FROM:**

\_\_\_\_\_  
Steven G. West, Program Manager

Ginger James, Contracts Manager

**DESCRIPTION OF ENCLOSURE:** Response to Comments on Draft Site Specific Health and Safety Plan. Remediation of Various Underground Storage Tank Sites at Marine Corps Air Station, El Toro, Ca.

**TYPE:** Contract Deliverable ( ) D.O. Deliverable  Request for Change ( ) Other

**VERSION:** Draft

**REVISION NO.:** 0

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# MEMORANDUM

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**DATE:** November 8, 1995  
**TO:** William Sedlak, Lynn Homecker(Code 1831.LMH)  
**FROM:** Roger Margotto, OHM CIH  
**RE:** Response to Comments on Draft Site Specific Health and Safety Plan for SWDIV Contract No. N68711-93-D-1459, Delivery Order No. 0024, Remediation of Various Underground Storage Tank Sites at Marine Corps Air Station, El Toro, CA dated August 1995, OHM Project Number 17486, Control Number SW 1083

**Response to General Comments:** When new sites are added, Project Management will notify the HSO. The HSO will map the area of each new site and send technical findings (analytical results, etc.) and site conditions ( utilities, buildings, roads, etc.) to the Project Health and Safety Manager for review, and an amendment will be prepared for each new site by the Health and Safety Manager. At the time the plan was written other alternative treatment methods were proposed but it was unsure which methods were actually going to be used in this project. The SHSP will be updated to include the installation of a pilot test unit for soil vapor extraction. Not included in this plan is a discussion of *in situ* remediation which is not planned for this project at this time.

Review Comment	Response
a. Page 3-1, Section 3: Please assure that the daily "tailgate" safety meetings adequately discuss and document traditional construction safety issues. For example, discussions should include: ladder safety, trenching, shoring, working from heights, etc. Please assure documentation of these training sessions are available for the Navy Technical Representatives' (NTRs) review.	A sentence has been added to the section to include this reminder. Since the OHM Health and Safety Procedures Manual addresses all these topics and more, the HSO has the use of this manual and the EM 385-1-1 manual to review construction safety issues. The second paragraph will be re-written as follows: <i>"Daily "tailgate" safety meetings are held at the beginning of the shift, prior to the day's remediation activity, in which potential chemical, physical, and environmental hazards and preventative safety measures are discussed. The HSO will insure that the construction activities of the day are specifically discussed and that a review of specific hazards is discussed for any new tasks that have not been previously discussed. The HSO will use the OHM Health and Safety Procedures Manual and the USACE EM 385-1-1 Safety and Health Requirements Manual and any developed</i>

Review Comment	Response
	<p><i>Hazard Analyses for this discussion. The HSO will specifically annotate points discussed on the daily safety meeting form used for attendance documentation. Another safety meeting is held at the end of each shift to discuss "lessons learned" and safety issues identified throughout the day. Attendance at both these meetings is documented on the tailgate meeting form found in Procedure 14 of the OHM Health and Safety Procedures Manual."</i></p>
<p>b. Page 3-8, Section 3.2.8: The second paragraph of this section is unclear.</p>	<p>The sentence will be re-written as follows:  <i>"Excavated stockpiles will be covered with polyethylene (or other approved plastic material) at the end of each daily workshift to minimize the potential dispersion of excavated materials by wind or rain."</i></p>
<p>c. Page 3-11 and 3-12, Section 3.4: Tasks "removal of all liquids, sludges and solids from piping and tanks (if any)" and "tank cleaning and inerting" does not discuss confined space entry as a possible hazard.</p>	<p>On page 3-11 for this assessment will be added the Specific Hazard: <i>"Confined Space"</i>. On page 3-12 will be added to Precautions: <i>"Confined space entries not authorized until thorough training has been conducted, OHM Health and Safety Procedures Manual Procedure 24 reviewed, all necessary equipment is in place and a permit prepared and approved by the HSO."</i></p>
<p>d. Page 3-13: The only technology discussed is the thermal desorption unit. If applicable the hazards of the other technologies should also be discussed in this section.</p>	<p>At the time the plan was written only the thermal desorption unit and bioremediation were planned, the other technologies were proposed and not finalized. At this point we know that a soil vapor extraction (pilot test) is planned. Therefore, the plan has been modified to include a discussion on this technology.</p>
<p>e. Page 3-16, Section 3.5.9: Please clarify the first sentence in this section. What is meant by "every area on the job site"?</p>	<p>After first sentence ending with "in every work area on the job site." will be inserted the following: <i>"At each work area a 20 lb. ABC dry chemical fire extinguisher will be placed in the contamination reduction corridor(CRC) in the contamination reduction zone (CRZ). Each piece of heavy equipment (dozer, backhoe, etc.) will have minimum of a 2 -½ lb ABC dry chemical fire extinguisher. A 20-lb ABC dry chemical fire extinguisher will be available in the project support office. A work area is a contiguous zone or area which incorporates the exclusion zone and contamination reduction zone. Two separate site layouts that are adjacent to each</i></p>

Review Comment	Response
	<p><i>other but require separate CRCs would be two separate work areas, each requiring separate emergency equipment."</i></p>
<p>f. Page 8-1, Section 8-1: Please clarify where these emergency services will be located. Will the health and safety plan be taken to the hospital with injured personnel.</p>	<p>The "bullets" in Section 8.1 have been modified as follows:</p> <ul style="list-style-type: none"> <li>• <i>Fire extinguisher, minimum one 20 lb dry chemical ABC type at each excavation site in the Contamination Reduction Corridor(CRC) at edge of exclusion zone</i></li> <li>• <i>Industrial first aid kit, in the CRC, at the edge of the Support Zone</i></li> <li>• <i>Portable eye wash, capable of supplying 15 minutes of water in each support area, at the edge of the Support Zone</i></li> <li>• <i>Emergency shower, capable of supplying 15 minutes of water in the CRC, at the edge of the Support Zone (as determined by the HSO and HSM based on the contaminants present at the specific site)</i></li> <li>• <i>Air horn at each support area, at the edge of the Support Zone</i></li> <li>• <i>Spill control material consisting of either absorbent pillows or absorbent material and shovels, in the support zone by the CRC entrance .</i></li> </ul> <p><i>The following equipment will be available at the support trailer for use in an emergency situation:</i></p> <ul style="list-style-type: none"> <li>• <i>Air horn</i></li> <li>• <i>Industrial first aid kit</i></li> <li>• <i>Blanket</i></li> <li>• <i>Emergency shower.</i></li> <li>• <i>2 each SCBA with 2 spare bottle</i></li> <li>• <i>Ice packs or other cooling devices to include air-conditioning (if possible)</i></li> </ul> <p>The SHSP will not accompany the injured worker to the hospital. The MSDSs for work site materials should accompany the injured worker.</p>
<p>g. Table 8-1, Emergency Information: This table does not provide other standard emergency information (i.e. telephone number for Poison Control Center, RCRA Hotline, etc.)</p>	<p>The table will be amended to include the following:</p> <p><u>CHEMTREC:</u> (800) 424-9300</p> <p><u>National Response Center:</u> (800) 424-8802</p> <p><u>RCRA Hotline:</u> (800) 424-9346</p> <p><u>Poison Control Center:</u> (800) 764-7661</p>