

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
2151 BERKELEY WAY, ANNEX 7
BERKELEY, CA 94704



March 18, 1988

Commanding Officer
Naval Station, Treasure Island
Hunters Point Annex
(Attention: LCDR. G. Thomas, USN)
San Francisco, CA 94130-5000

Dear Mr. Thomas:

DRAFT SITE SAFETY PLAN FOR HUNTERS POINT ANNEX

We have reviewed the Draft Site Safety Plan dated January 20, 1988. Based on this review, we have determined the draft plan is not consistent with the requirements of the Remedial Action Order. Therefore, it cannot be approved.

Enclosed are our comments regarding the draft plan. These comments must be addressed in a revised final Site Safety Plan. Pursuant to Section 6.9 (b) of the Remedial Action Order, please revise and resubmit the Site Safety Plan by April 18, 1988.

Should you have any questions, please contact Chein Kao of this office at (415) 540-3052.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Hatayama", with a long horizontal flourish extending to the right.

Howard Hatayama, Chief
Site Mitigation Unit
North Coast California Section
Toxic Substances Control Division

Enclosure

cc: Alex Dong, Navy West Division
Roger James, SF RWQCB
Keith Takata, U.S. EPA Region IX
Scott Lutz, BAAQMD
Dave Wells, SF DPH
Steve Castleman, SFDA

HH:ck:na

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DHS COMMENTS ON HUNTER'S POINT DRAFT SITE SAFETY PLAN

1. Risk Assessment (Section 5) - Inadequate.

Some kind of risk or hazard analysis must be done for each site task or operation based on the preliminary information or previous investigations.

2. Monitoring Section (Section 6).

There should be some discussion on calibration of direct reading instruments or personal monitoring equipments.

3. Personal Protective Equipment Section (Section 7).

A written respiratory protective program should be included.

4. Site Control Measures (Section 8).

A site communications system should be discussed.

5. General Safe Work Practices [S.O.P.'s] (Section 10).

More detail on day-to-day repetitive procedures should be covered in this section.

6. Response to Emergency (Section 11).

The eyewash fountain (in Section 11.3 of the Contingency Plan) must be capable of washing both eyes simultaneously and provide 15 minutes of water.

Persons trained in first aid and CPR should be identified (Recommended - Not Mandatory).

7. Medical Monitoring (Section 13).

Frequency of medical exams should be listed, including baseline and termination exams. The physician must be notified of the employee's job duties and anticipated levels of exposure.