

**RESPONSE TO COMMENTS
DRAFT SITE HEALTH AND SAFETY PLAN
NON-TIME CRITICAL REMOVAL ACTION
INSTALLATION RESTORATION SITE 14
FORMER NAVAL STATION LONG BEACH
LONG BEACH, CALIFORNIA**

DCN: FWSD-RAC-01-0457

March 22, 2001

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Specific Comments from DTSC:

Comment 1. Section 4.3, Physical Hazards. In regards to excavation activities, the HASP refers to another document not found within the HASP. Please provide within the HASP the pertinent hazard identification and precautionary measures to be taken in regards to excavation activities at the site.

Response 1. Comment noted. The Facility Wide Health and Safety Plan was submitted with previous plans for the former LBNAVSTA and was not attached to this document. A copy of the Final Facility Wide Health and Safety Plan will be at the site along with the Site Specific Health and Safety Plan (SHSP) during field activities. Specific hazard analysis for excavation hazards is located in the Activity Hazard Analysis (AHA) section attached to the SHSP.

Comment 2. Section 6.0, Personal protective Equipment. It is stated that personal protective equipment is listed in Table 3. However, Table 3 contains emergency response information, not PPE information. Under Attachment #2, Soil and Groundwater Hazard Analysis #2, it states that PPE information is found in the HASP. The only section to refer to is Section 6.0, which does not contain site-specific PPE information. Please provide specific PPE information as necessary for each task.

Response 2. Comment noted. Table 2 of the SHSP contains the site specific PPE information.

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<p>Comment 3. Section 7.0, Air Monitoring. Air monitoring in regards to excavation activities is not specifically addressed in this section. The contaminated dust generated by excavation activities must be taken into consideration in the HASP. Will dust generation occur? If so, will air monitoring be conducted? If contaminated dust is an issue, then please address monitoring instrumentation to be used, calibration, frequency and location of monitoring. Will personal and/or perimeter air sampling be necessary? If so, please identify the action levels to be used at each location and the action to be taken should those levels be exceeded.</p>	<p>Response 3. Comment noted. Dust control at the site is required to maintain dust levels below visible levels. Dust monitoring will be performed using real time direct reading instrument. In addition, upwind and downwind samplers will be utilized during field activities for TSP, PM₁₀ and VOCs.</p>
<p>Comment 4. Section 13.0, Training. No information has been provided regarding the specific training required by T8CCR5192, Hazardous Waste Operations and Emergency Response. It is HERD's understanding that Site 14 is considered a hazardous waste site, therefore, the pertinent training requirements of the above standard would apply, regardless of the chemical, physical, or biological risk present. Please provide information regarding the training required for site employees.</p>	<p>Response 4. Comment noted. The discussion of training requirements for this and all projects under the contract with Navy is found in Section 13 of the Facility Wide Health and Safety Plan.</p>
<p>Comment 5. Section 9.0, Medical Surveillance Procedures. Information regarding medical surveillance has not been provided in this section. In Section 7.0, it states that respiratory protection will be utilized if the action level is exceeded. Please describe the medical program provided for those employees who may be required to wear respiratory protection.</p>	<p>Response 5. Comment noted. The Medical Surveillance program is described in Section 9 of the Facility Wide Health and Safety Plan that was not attached to the submitted document. Both the company medical surveillance program and the respiratory protection program are described in referenced procedures that are not part of the submittal. Although it was mentioned that there might be need for respiratory protection, such a need is not expected since contaminants are at very low levels.</p>
<p>Comment 6. Attachment Three, Field Team Review Sheet. This sheet refers to the "...installation and operation of a treatment system..." Please revise this form to reflect the current scope of work.</p>	<p>Response 6. Comment noted. This sheet will be revised to indicate the new title of action on this project.</p>

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Comment 7. Lighting Minimum illumination intensities are required during all site activities. Please specify how these requirements will be met and verified. If it is anticipated that all field activities will be conducted during daylight hours, please state such.

Response 7. Comment noted. All activities will be conducted during daylight hours only. This is presumed on all projects since the contract with the Navy requires performance of the work during ordinary business hours.

Comment 8. Confined space. Provide information on confined space entry procedures in compliance with Title 8 and other appropriate regulations. Identify all confined space entry locations and their inherent risks and specific safety precautions. If confined space is not an issue at this site, then state such in the plan.

Response 8. Comment noted. There are no confined spaces on this project. The Facility Wide Health and Safety Plan states that no confined space entries are planned for any project at the former LBNAVSTA unless it is included in the Site-Specific health and Safety Plan.

Comment 9. Radiation Monitoring. Is ionizing radiation suspected for confirmed at the Site? What types of surveys and characterization have occurred?

Response 9. Comment noted. No ionizing radiation is anticipated for this project, as past activities at this site did not have activities where radioactive materials would have been used or disposed.

Comment 10. Sanitation. Please specify in the plan whether sanitary facilities will be available on site or will portable sanitary facilities be brought to the site. Please address the need and location of potable water.

Response 10. Comment noted. The Facility Wide Health and Safety Plan describes sanitation at all projects at the former LBNAVSTA. Portable sanitary facilities and potable water will be brought to the Site during field activities.

FOSTER WHEELER

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TRANSMITTAL/DELIVERABLE RECEIPT

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TO: Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Lovering, 02R1.RL
1220 Pacific Highway
San Diego, CA 92132-5190

DATE: 03/26/01
CTO: 0012
LOCATION: LBNBY Long Beach
NAVSTA

FROM:


Neil Hart, Program Manager

DESCRIPTION: Response to Comments, Draft Health & Safety Plan, Non-Time
Critical Removal Action, IR Site 14, 03/22/01

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 Other

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