

N68311.000509  
NAVSTA LONG BEACH  
SSIC #5090.3

01 September 1993

TECHNICAL MEMORANDUM

From: Code 1852.JC  
To: Code 1853.CL

Subj: REVIEW OF DRAFT HEALTH AND SAFETY PLAN FOR SITE 6A NAVAL STATION LONG BEACH, CA

- Ref: (a) Navy/Marine Corps Installation Restoration Manual, Feb. 1992.
- (b) Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities. NIOSH/OSHA/USCG/EPA. October 1985.
- (c) 29 CFR 1910.120
- (d) 29 CFR 1910.165
- (e) California Code of Regulations, Title 8, section 5192.
- (f) 29 CFR 1910.1030
- (g) 29 CFR 1910.1200

1. Per references (a) - (g), the subject document has been reviewed. The Bechtel National, Inc. Contract No.: N68711-92-D-4670, CTO -027.

2. **General Impression:**

The overall content is: Good  
 The document is: Substantially Complete  
 Document quality is: Good

3. **Comments:** The following comments are provided:

General comments:

- a. The Health and Safety Plan is well written and addresses most major sections required under 29 CFR 1910.120. Sections such as Air Monitoring and Hazard Identification are particularly well written and specific to the site.
- b. Many important figures are missing from the plan.

Specific comments:

- a. Page 1-1, Specific Requirements: 29 CFR 1910.120 is the applicable federal requirement.
- b. Page 2-1, General: Figures 2-1, 2-2 and 2-3 are not included in the plan. Please provide these figures for review.
- c. Page 3-1, Workplan Summary: The draft RI/FS proposes 39 soil samples. Paragraph two indicates approximately 46 soil samples will be obtained. Provide rationale for the difference.

d. Page 3-1, Task Summary: Good section.

e. Page 4-2, Table 4-1: Provide names and telephone numbers of identified alternate health and safety personnel. Provide rationale for assigning Mr. Conrad Sherman to so many key positions. Complete all information in the table.

f. Page 4-3, Table 4-2: Complete all information in Table 4-2.

g. Page 5-1, Section 5 Hazard Identification: Generally a well written and site-specific analysis. Please address the following comments:

i) Table 5-1 does not include some of the tasks listed on page 3-1. Assure the list of tasks completely addresses the site specific conditions found on site 6A.

h. Page 5-2, Table 5-1: Table 5-1 indicates that "Radioactive contamination spread, air borne radioactivity" may be present. However on the following page (page 5-3), it indicates that ionizing radiation and non-ionizing radiation has not been identified during the site assessment. Radiation hazards on page 6-3 also indicates that workers may be exposed to a variety of physical radiation hazards. Please clarify.

i. Page 6-2, Vehicle and Heavy Equipment Operation: Vehicles and heavy equipment should be equipped with alarms while backing up.

j. Page 6-6, Table 6-2: Complete all information in the table.

k. Page 6-13, Table 6-5: Please clarify the footnotes found on this table. Do CLEAN II Program Exposure Limits correspond to OSHA PELs? Reference 2 indicates that ACGIH is the same as NIOSH, this is incorrect.

l. Page 6-14, Table 6-5(continued): Please provide rationale for using CAL-OSHA references in this table.

m. Page 6-17, top paragraph: Provide rationale for encouraging the use of odor as a method to upgrade respiratory protection and initiate personnel monitoring.

n. Page 7-2, Figure 7-1: Figure is incomplete.

o. Page 8-1, PPE and Apparel Decontamination: Figures 8-1, 8-2 and 8-3 are not available for review.

p. Page 8-2, Hazardous Waste Minimization Practices: Consider compacting the waste as a minimization option.

q. Page 9-1, Special Monitoring Protocol: This section indicates that work on site 6A will not require special monitoring programs. However page 6-16, Section 6.5.9 Polychlorinated Biphenyls, indicates "Work involving exposure to PCB requires special medical evaluation and approval of the Program Health and Safety Manager". Please clarify.

r. Page 10-11, Table 10-5: Table does not address unknown contaminants or uncharacterized mixtures. 29 CFR 1910.120 indicates that if sufficient information is not available to identify the hazards or suspected hazards, an ensemble providing protection equivalent to Level B PPE shall be provided as a minimum.

s. Page 10-12, Table 10-6: Table does not appear to be complete.

t. Page 11-2, Table 11-1: Delete reference to "surgical" gloves.

u. Page 11-3, Table 11-1(continued): Level D protection refers to work functions which preclude splashes, immersion, or the potential for unexpected inhalation of or contact with hazardous levels of any chemical. Clarify how this task will not possibly cause splashes to the employee which will soak through their coveralls and remain in contact with the skin. Assure that coveralls are not worn off-site.

v. Page 12-1, General: Hazard Communication program must also comply with 29 CFR 1910.1200.

w. Page 14-1, Training Program: Please address the following comments:

i) Employees must also meet the Hazwoper requirements of 29 CFR 1910.120.

ii) Employees must also meet the requirements of 3 days of field training. Explain how this will be accomplished.

iii) Supervisors must also receive at least eight additional hours of specialized training at the time of job assignment.

iv) Assure that personnel performing CPR/First Aid who may be exposed to blood and other potentially infectious materials conform to 29 CFR 1910.1030.

v) Provide documentation of employee training to Navy representative.

vi) Daily safety meetings should be held before and after work.

x. Page 16-1, General: Assure arrangements have been made with the base Fire, Ambulance and Security departments to respond to an emergency. Assure MSDSs are available for all emergency response personnel.

y. Page 16-1, General: Figures 16-1 and 16-2 are not available for review. Assure medical facilities referred to in the plan will accept contaminated personnel at their facility. Assure MSDSs are available to all emergency response personnel.

z. Page 16-13, Evacuation Plan: Figure 16-4 is not available for review.

aa. Page 20-1, Personnel Expectations: Although the buddy system must be complied with, no mention is made of a predesignated hand signal system to alert employees of danger.

bb. Page 21-1, Spill Control and Containment: Provide a detailed and complete list of spill control equipment at site 6A.

4. **Recommendations:** Accept draft and incorporate and/or address all comments.

5. If you have any questions or need clarification, please feel free to contact me at (619) 532-1446.

  
JANET A. CORBETT

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