

DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
100 HEINZ AVE., SUITE 200  
BERKELEY, CA 94710  
(415) 540-3815

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TREASURE ISLAND  
SSIC NO. 5090.3.A  
July 29, 1991



Commanding Officer  
Western Division  
Attn: Mr. Ernesto Galang  
Naval Facilities Engineering Command  
P.O. Box 727  
San Bruno, CA 94066-0720

Dear Mr. Galang:

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL COMMENTS ON THE DRAFT FINAL  
HEALTH AND SAFETY PLAN, TREASURE ISLAND, CALIFORNIA**

On June 21, 1991, you submitted to the Department of Toxic Substances Control (DTSC) a copy of Draft Final Health and Safety Plan (H&SP) for the Remedial Investigation/Feasibility Study (RI/FS) at Treasure Island (TI). Your submission of the Draft Final QAPP is for DHS review and comment.

Enclosed you will find DTSC's comments on the submitted report. Please ensure that these comments are addressed when revising the H&SP.

You may call me at (415) 540-3815 if you have questions or comments.

Sincerely,

A handwritten signature in cursive script that reads "Romy F. Fuentes".

Romy F. Fuentes  
Waste Management Engineer  
Region 2  
Toxic Substances Control

Enclosure

cc: Commanding Officer  
Building One, Code 82.2  
Attn.: Mr. Eddie Sarmiento  
Staff Civil Engineers Office  
NAVSTA Treasure Island  
San Francisco, CA 94103

Mr. Tom Gandesbery  
S.F. Bay, RWQCB  
2101 Webster Street, Suite 500  
Oakland, CA 94611

ADMIN RECORD

35  
D/N 5

DTSC COMMENTS ON THE HEALTH AND SAFETY PLAN TREASURE ISLAND NAVAL  
WEAPON STATION

**GENERAL COMMENTS:**

The Department of Toxic Substances Control (Department) finds the submitted Health & Safety Plan (H&SP) very difficult to review. Most of the information are so general and do not reflect problems pertaining to each individual site. On almost all the sites, the H&SP indicates low toxicity for contaminants of concern; however, the H&SP does not give any rationale as to why the toxicity might be low. As part of the general operating procedures, the H&SP should discuss drilling safety procedures, and decontamination procedures for drilling equipment, heavy equipment and hard tools.

**SPECIFIC COMMENTS:**

- 1) Page 47, Section 11.4.1 and Section 11.4.2. These sections refer to the QAPjP. There is no discussion on the decontamination of non-disposable equipment found in the submitted draft final QAPjP (June 14, 1991).
- 2) Pages 64 & 65. On page 64, the H&SP indicates that the Building 257 area is well ventilated; however, the H&SP defines the area as "confined" on page 65. A confined space is a site condition in which insufficient ventilation, with difficult or inadequate access or egress, exists. If it is not a confined space, please do not refer to it as confined.
- 3) Page 72. The H&SP needs more information on x-ray developer fluid. Please indicate whether the fixer contains cyanide.
- 4) Page 75. The H&SP explains that field staff will use appropriate air monitoring equipment for other volatile organics. This is a generic statement. Please state exactly what specific monitoring equipment will be used.
- 5) Page 92, middle paragraph. The H&S plan should use a conservative approach in determining the level of protection appropriate for a specific site condition. The plan should indicate that during field activities at a site with unknown site condition, field staff will start in level C protection. The level of protection will be downgraded to level D if indicators show no respiratory hazard exist on site. Moreover, the H&SP does not indicate what respirator cartridges will be used in each task. The H&SP should be more specific on types of personal protective equipment (PPE) and direct reading instruments that will be used during field work.
- 6) Site 7. The H&SP needs more information about pesticides that were used.
- 7) For all site discussions regarding oxygen depletion. The minimum level of oxygen content in a breathing area should be corrected to 19.5 %.

SITE SAFETY PLAN REVIEW

Site Project NAVAL STATION TREASURES ISLAND  
 Project Officer ROMY FUENTES  
 Responsible Party \_\_\_\_\_  
 Contractor PEC  
 Operation \_\_\_\_\_

Start-Up Date \_\_\_\_\_

	IMPROVEMENT		
	<u>ADEQUATE</u>	<u>NEEDED</u>	<u>INADEQUATE</u>
1. Facility Background	✓		
2. Persons Responsible	✓		
3. Risk Analysis			✓
4. Training Program	✓		
5. Personal Protective Eqt.	✓		
6. Medical Surveillance	✓		
7. Monitoring			✓
8. Site Control Measures			✓
9. Decontamination Procedures		✓	
10. Site's S.O.P.	✓		
11. Contingency Plan	✓		

COMMENTS:

IH REVIEW *[Signature]* DATE 7/29/91