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From: Commanding Officer, Navy Environmental Health Center
To: Commanding Officer, Atlantic Division, Naval Facilities Engineering Command
(Kirk Stevens), 1510 Gilbert Street, Norfolk, VA 23511-2699

Subj: HEALTH AND SAFETY PLAN REVIEW DRAFT PILOT STUDY,
OPERABLE UNIT NO. 1, SITE 78, MARINE CORPS BASE CAMP
LEJEUNE, NC

Ref: (a) Baker Environmental, Inc. Letter of Transmittal S. O. No. 26007-253-0000-SRN
of 20 Sep 02

Encl: (1) Subject Health and Safety Plan Review
(2) Medical/Health Comments Survey

1. Per reference (a), we have completed a review of the subject document and are forwarding our comments to you as enclosure (1).
2. Please complete and return enclosure (2) as your comments are needed to continually improve our services to you.
3. We are available to discuss the enclosed information by telephone with you and, if you desire, with you and your contractor. If you require additional assistance, please call Mr. Donald J. Coons at (757) 953-0936 or Mr. David McConaughy at (757) 953-0942. The DSN prefix is 377. The e-mail addresses are: coonsd@nehc.med.navy.mil and mcconaughyd@nehc.med.navy.mil.

C. P. RENNIX
By direction

Copy to: (w/o Encl (2))
CNO (N-453)
NAVFAC (ENC-KPB)
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MCB Camp Lejeune (ACS EMD/IRP)



NAVY ENVIRONMENTAL HEALTH CENTER ENVIRONMENTAL PROGRAMS DIRECTORATE

Health and Safety Plan Review

Location: North Carolina

Command: MCB Camp Lejeune

Site: Operable Unit No. 1, Site 78

Work Description: Draft Pilot Study

Document Date: September 2002

Contract No/Contract Task Order No: N62470-89-D-6007/0253

EP Document No: 1521

Prepared for: LANTNAVFACENGCOM

Prepared by: CH2M Hill Federal Group, LTD., and Baker Environmental, INC.

Date Received: 23 September 2002

Reviewed by:

Mr. Donald J. Coons, (757) 953-0936, coonsd@nehc.med.navy.mil, DSN 377

HEALTH AND SAFETY PLAN REVIEW

- Ref: (a) 29 CFR 1910.120 (Hazardous Waste Operations and Emergency Response)
(b) 29 CFR 1926.65 (Hazardous Waste Operations and Emergency Response)
(c) Navy/Marine Corps Installation Restoration Manual (February 1997)
(d) U. S. Army Corps of Engineers, Safety and Health Requirements Manual, EM 385-1-1

General Comment: We compared this health and safety plan (HASP) to federal requirements found in references (a) through (d), and have noted discrepancies in this HASP from these primary references. The acronyms used in our comments are included as Attachment (1).

Specific Comments:

1. Pages 1-1 through 1-3, "Introduction":

Comments:

a. In Section 1.1, "Policy," the third sentence states, "Applicability of this HASP extends to all Baker employees, Baker's subcontractors, and visitors entering the site." Then in Section 1.2, entitled "Scope," the first sentence of the paragraph states "The provisions of this HASP are applicable to Baker personnel involved with the Pilot Study field activities." The applicability of the HASP listed in the "Policy" section should be the same as that listed in the "Scope" section.

b. In Section 1.1, "Policy," the fourth sentence states, "However, subcontractors are expected to provide their own HASP and relevant Standard Operating Procedures (SOPs) that pertain to the activities they are contracted to perform on the site."

Recommendations:

- a. Revise the document to provide consistent guidance throughout the HASP.
- b. We recommend including a requirement that the health and safety documents submitted by the subcontractor(s) will be reviewed by an appropriate Baker official prior to the subcontractor commencing site operations.

2. Pages 3-11 through 3-15, Section 3.6, "Task-Specific Hazards":

Comment: Information provided throughout this section provides a summary of hazards associated with specific tasks that will be performed during this scope of work. They do not provide the guidance that usually would be found in site-specific task-hazard analysis (THA). For example, information pertaining to air-monitoring, requirements, additional training needs, equipment to be utilized, or methods of controlling potential hazards is not provided. A properly prepared THA should contain information regarding each major task, the potential hazards that may be encountered while performing that task, and what protective measures/controls are to be applied.

Recommendation: Include site-specific THAs in the final health and safety plan for each activity, including a THA for decontamination of large equipment. We recommend using the three-column format found on page 4, Figure 1-1, of the *U. S. Army Corps of Engineers Safety and Health Requirements Manual*, EM 385-1-1, 3 September 1996 for its completeness and ease of use.

3. Pages 5-1 through 5-3, Section 5.0, "Exposure Monitoring":

Comment: A method to inform site workers of air monitoring results is not included.

Recommendation: Include a method to inform site workers of air monitoring results in a timely manner in the final health and safety plan.

4. Appendix A, "Baker Safety Standard Operating Procedures, Baker Heat Stress Prevention Program, dated July 1996":

Comments:

a. Section 4.1 entitled "Signs, Symptoms, and Conditions," and Section 4.2 entitled, "Caring For Heat Related Illness," contain incomplete information regarding symptoms and field treatment of heat casualties, particularly those suffering from heat exhaustion and more importantly heat stroke. For example, those personnel experiencing heat exhaustion may also have slightly elevated body temperatures of up to about 102 degrees Fahrenheit, while those manifesting signs of potential heat stroke most likely will have core body temperatures of 104 degrees Fahrenheit or above. Additionally, for those personnel presenting signs of heat stroke it is important to remove all PPE, and as much personal clothing as decency permits to allow application of cool water mists, sponge baths using cool water, or ice packs to the axilla or groin areas while fanning the victim.

b. In Section 4.4.1, "Permeable Clothing Monitoring," item number two (2) of the first paragraph directs "Fluid intake discipline." It is unclear what is meant by "Fluid intake discipline."

c. Section 5.0, "References," cites the *American Conference of Governmental Hygienist*, 1995 – 1996, Threshold Limit Values for Chemical Substances and Physical Agents." The current edition of this document is dated 2002.

Recommendations:

a. Revise Sections 4.1 and 4.2 to include additional guidance for the proper treatment and management of personnel experiencing heat stress related injury.

b. Revise item 2, to direct the frequent intake of fluid replenishment (i.e., water, electrolyte solutions) during the work period.

c. We suggest including the NIOSH/OSHA/USCG/EPA *Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities*, DHHS (NIOSH) Publication No. 85-115 as a future reference.

FROM: _____ (YOUR NAME/COMMAND)
TO: NAVENVIRHLTHCEN, ENVIRONMENTAL PROGRAMS
FAX: COM: (757) 444-7261/DSN: 564-7261

MEDICAL/HEALTH COMMENTS - YOUR VIEW

Please help us improve our review process by indicating the extent to which you agree or disagree with the comments we provided your activity.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
1. "Value added" to IR/BRAC process?	1	2	3	4	5
2. Received in a timely manner?	1	2	3	4	5
3. High level of technical expertise?	1	2	3	4	5
4. Very useful to the RPM?	1	2	3	4	5
5. Contractor incorporated comments?	1	2	3	4	5
6. Easily readable/useful format?	1	2	3	4	5
7. Overall review was of high quality?	1	2	3	4	5
8. NAVENVIRHLTHCEN was easily accessible?	1	2	3	4	5
9. NAVENVIRHLTHCEN input during scoping or workplan development would be "value added"?	1	2	3	4	5
10. Added involvement in IR/BRAC document needed?	1	2	3	4	5

Please return by fax using the box provided at the top of this page. If you have any other comments, please list them below or telephone Ms. Mary Ann Simmons, Industrial Hygienist at (757) 953-0945, DSN 377, or, Mr. Donald J. Coons, Environmental Safety Technician, (757) 953-0936, DSN 377, at any time to discuss your viewpoint. As our customer, Yours truly, comments and suggestions of how we can improve our services to you are important!

ACRONYMS

ACGIH:	American Conference of Governmental Industrial Hygienists
ANSI:	American National Standards Institute
ATSDR:	Agency for Toxic Substances and Disease Registry
BBP:	Bloodborne Pathogen Program
COC:	Contaminant of Concern
CPR:	Cardiopulmonary Resuscitation
CRZ:	Contamination Reduction Zone
EIC:	Engineer-in-Charge
EMS:	Emergency Medical Service
EPA:	Environmental Protection Agency
EZ:	Exclusion Zone
HBV:	Hepatitis B Virus
HIV:	Human Immunodeficiency Virus
IDLH:	Immediately Dangerous to Life and Health
LEL:	Lower Explosive Limit
LEPC:	Local Emergency Planning Committee
MSDS:	Material Safety Data Sheet
NIOSH:	National Institute for Occupational Safety and Health
NOSC:	Navy On-Scene Coordinator
NOSCDR:	Navy On-Scene Commander
OSHA:	Occupational Safety and Health Administration
OV:	Organic Vapor
PCB:	Polychlorinated Biphenyl
PEL:	Permissible Exposure Limit
PID:	Photoionization Device
PPE:	Personal Protective Equipment
PPM:	Parts Per Million
SCBA:	Self Contained Breathing Apparatus
SOP:	Standard Operating Procedure
STEL:	Short Term Exposure Limit
TLV:	Threshold Limit Value