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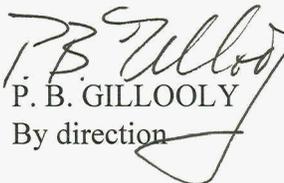
From: Commanding Officer, Navy Environmental Health Center  
To: Commanding Officer, Atlantic Division, Naval Facilities Engineering Command  
(Tim Reisch), 1510 Gilbert Street, Norfolk, VA 23511-2699

Subj: MASTER HEALTH AND SAFETY PLAN, ST. JULIENS CREEK ANNEX,  
CHESAPEAKE, VA

Ref: (a) Your ltr 5090 Ser 18225:TAR:swj of 26 Jul 99

Encl: (1) Subject Health and Safety Plan Review

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 your and your contractor. If you require additional assistance, please call Mr. W. H. Etheridge at (757) 462-5549 or Mr. David McConaughy at (757) 452-5557. The DSN prefix is 253. They can also be reached at the following e-mail addresses: etheridgew@nehc.med.navy.mil and mcconaughyd@nehc.med.navy.mil.

  
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## NAVY ENVIRONMENTAL HEALTH CENTER ENVIRONMENTAL PROGRAMS DIRECTORATE

### Health and Safety Plan Review

**Location:** Chesapeake, VA

**Command:** St. Juliens Creek Annex

**Site:** Entire St. Juliens Creek Annex

**Work Description:** Master Health and Safety Plan

**Document Date:** 26 July 1999

**Contract No/Delivery Order No:** N62470-95-D-6007g/0015

**EP Document No:** 1414

**Prepared for:** LANTNAVFACENGCOM

**Prepared by:** CDM Federal Programs Corporation

**Forwarded on:** 28 July 1999

**Reviewed by:**

W. H. Etheridge, (757) 462-5549, etheridgew@nehc.med.navy.mil, DSN 253

## 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) *Corps* of Engineers Health and Safety Manual, EM 385-1-1

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

### **Specific Comments:**

1. Page 1, "Introduction":

**Comment:** In the introductory paragraph, the document mentions that information to be included in the site-specific HASP is outlined in the HASP site-specific checklist, located in Attachment A of the Master Work Plan (WP). Attachment A was not included in the Master HASP or the Master WP for the St. Juliens Creek Annex site.

**Recommendation:** Include Attachment A in the Master Work Plan as required by the Master HASP.

2. Page 8, "Section 3.1.2, "Symptoms and Treatment of Heat Stress":

**Comment:** Under the category defined as "Heat Stroke," the term "high oral temperature" is used to describe one of the symptoms of heat stroke. The document does not define what is considered "high oral temperature" in terms of heat stress symptoms.

**Recommendation:** Define the specific ranges of temperature considered as "high oral temperature."

**Comment:** The document limits the treatment for heat stroke victims to cooling, calling an ambulance, and obtaining immediate medical attention. Additional actions should include moving the victim to a shaded area, removing clothing, and, if conscious, providing the victim with small amounts of cool liquids while awaiting transport to a medical facility.

**Recommendation:** Include the aforementioned treatment procedures for heat stroke victims in Section 3.1.2.

3. Page 11, Table 3.3, “General Physical (Safety) Hazards and Controls”:

**Comment:** Under the column listed as “Engineering Controls, Administrative Controls, and Work Practices,” the document requires, for noise greater than 85dBa, noise protection and monitoring.

**Recommendation:** Include the requirement for labeling of noise hazardous equipment under the aforementioned column in Table 3.3.

4. Page 27, Section 5.1, “PPE Specifications”:

**Comment:** Under the category of “Head,” the required personal protective equipment includes hardhat, safety glasses, and ear protection. The footnote addressing hearing protection states that “Ear protection should be worn while working around drill rigs or other noise-producing equipment or when conversations cannot be held at distances of 3 feet or less without shouting.” The document should include more definitive procedures for measuring and labeling noise hazardous equipment used at the site.

**Recommendation:** Include the requirement for measuring and labeling noise hazardous equipment. Additionally, depending upon the noise measurements, require personnel to wear single or double hearing protection around applicable noise hazardous equipment.

5. Page 36, Section 11.3, “Emergency Medical Treatment”:

**Comment:** The document has only one sentence concerning the initiating of cardiopulmonary resuscitation (CPR) in the field. The sentence reads “Initiate first aid and CPR where feasible.”

**Recommendation:** We recommend that the document include the requirement that a minimum of two personnel, trained in adult First Aid, CPR, and Bloodborne Pathogens criteria be on-site during work operations.