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DEPARTMENT OF THE NAVY

NAVY ENVIRONMENTAL HEALTH CENTER  
2510 WALMER AVENUE  
NORFOLK, VIRGINIA 23513-2617

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From: Commanding Officer, Navy Environmental Health Center  
To: Commander, Atlantic Division, Naval Facilities Engineering  
Command, Attn: Randy Jackson, 1510 Gilbert Street,  
Norfolk, VA 23511-2699

Subj: MEDICAL REVIEW OF INSTALLATION RESTORATION PROGRAM  
DOCUMENTS FOR ST JULIENS CREEK ANNEX, CHESAPEAKE, VA

Ref: (a) CDM Federal Programs Corporation ltr of 2 Dec 96

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

1. Per reference (a), we have completed a medical review of the "Draft Health and Safety Plan for Landfill C (Site 3) and Landfill D (Site 4), St. Juliens Creek Annex, Chesapeake, Virginia." Our comments are provided in enclosure (1).

2. Please complete and return enclosure (2). 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 necessary, with you and your contractor. If you require additional assistance, please call Mr Donald Coons at (757) 363-5547 or Ms. Mary Ann Simmons at (757) 363-5556. The DSN prefix is 864.

*Ambria Lunsford*  
A. E. LUNSFORD  
By direction

## 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 1992)

### General Comments:

1. The "Draft, Health and Safety Plan for Landfill C (Site 3) and Landfill D (Site 4), St. Juliens Creek Annex, Chesapeake, Virginia, Contract N62470-95-D-6007, Contract Task Order 027," was prepared for Commander, LANTNAVFACENGCOM, by CDM Federal Programs Corporation, and forwarded to the Navy Environmental Health Center on 5 December 1996. The document is dated 18 November 1996.
2. The method for the review is to compare the health and safety plan (HASP) to federal requirements under OSHA regulations and to Department of the Navy requirements under the "Navy/Marine Corps Installation Restoration Manual" (see references (a), (b), and (c), above). We noted deviations and/or differences in the plan from these primary references. A list of acronyms used in our comments is included as Attachment (1).
3. This is the first time we have seen this format used to prepare a HASP. While there is no specific or even preferred HASP format, we did find this somewhat difficult to use, perhaps because of unfamiliarity. Since others, specifically site workers, may encounter this problem, we recommend that a specific training session be provided prior to starting work. As an administrative comment, we feel it would be easier to find information if sections were better delineated, such as by using bold typeface and/or using a larger font size.
4. The following information is not included in this document:
  - a. Medical surveillance requirements. Note that the medical surveillance program must be performed or directed by a board certified occupational medicine physician.
  - b. Training criteria.
  - c. An emergency response plan (29 CFR 1910.120(1)) or an emergency action plan (29 CFR 1910.38).
  - d. Emergency first aid providers. Note that at least two certified first aid providers must be on-site during site operations. These providers must also receive bloodborne pathogens training in accordance with 29 CFR 1910.1030.
  - e. An activity hazard analysis (AHA) for each major phase of work. Pages 6 through 9 contain information that is part of an AHA, but is not complete. An AHA should provide a list

of tasks for each phase of work, all anticipated hazards, and appropriate safety precautions. A good example can be found in the U. S. Army Corps of Engineers' *Safety and Health Requirements Manual*, EM 385-1-1, October 1992, page 5.

5. The points of contact for review of the HASP are Mr. Donald J. Coons, Physical Science Technician, or Ms. Mary Ann Simmons, Industrial Hygienist, who may be contacted at (757) 363-5547 or 363-5556. The DSN prefix is 864.

Specific Comments:

1. Page 3 of 12, "History":

- Comment: The first sentence states, "The St. Juliens Creek Annex was originally an ammunition facility." Unexploded ordnance (UXO) may be a potential site hazard.

Recommendation: Determine if UXO is a potential hazard. If so, include site-specific guidance in the final document stating what actions personnel are to take.

2. Page 5 of 12, "Unlabeled/Unnamed Table listing of Contaminants":

Comment: The PEL/TLV for Aroclor 1254 is listed as "NE." However, the *ACGIH Threshold Limit Values for Chemicals and Physical Agents*, cites a TLV of 0.5 mg/m<sup>3</sup>, and that it is a suspect human carcinogen. Information regarding carcinogenicity of other compounds, such as, Arsenic, Chromium (depending on form), or Chrysene is not included.

Recommendation: Revise the table to include accurate and concise information, including PEL/TLVs, and potential carcinogenicity.

3. Page 6 of 12, "Field Activities Covered Under This Plan, Personnel \* and Responsibilities (Include subcontractors)":

Comments:

a. A company official is not assigned to establish communications with potential emergency responders, such as the NOSC/NOSCDR, LEPC, emergency medical responders, or fire and security personnel.

b. In the third column of this section titled, "CDM Federal Health Clearance," the terms "C Supervisor," and "C Trained," are used. It is unclear what this means.

c. A requirement that subcontractor(s) will provide their own site-specific task hazard analysis is not included.

Recommendations:

- a. Appoint an appropriate company official to establish communications with all potential emergency responders. Verify telephone numbers prior to commencing site operations.
- b. Clearly state what "C Supervisor" and "C Trained" means.
- c. We recommend that as a minimum, each subcontractor (s), provide their own site-specific task hazard analysis.

4. Page 9 of 12, "Decontamination Procedures":

Comment: We could not evaluate these procedures since they are included with the work plan. An activity hazard analysis for decontamination of heavy equipment is not provided.

Recommendation: Include site-specific activity hazard analysis for decontamination of heavy equipment.

5. Page 10 of 12, "Emergency Contacts":

Comments:

- a. The Portsmouth Naval Hospital is listed as the sole source of emergency medical care. Information stating how civilian contractor employees will access health (i.e., civilian humanitarian, or other) care at this facility is not provided.
- b. A telephone number for the NOSC/NOSCDR, or LEPC is not included in this listing.

Recommendations:

- a. While the Naval Hospital Portsmouth would be capable of providing emergency lifesaving treatment for civilian contractor employees, we recommend identifying a civilian medical facility nearest the Naval Shipyard (i.e., Maryview Hospital) for emergency medical care and/or other job injury related care.
- b. Provide telephone numbers for all potential emergency responders and verify the numbers prior to starting site operations.

6. Page 11 of 12, "Hospital Route Map":

Comment: This map is very difficult to read and does not contain directions to the medical facility(s) or their telephone number(s).

Recommendation: Provide a map that is easily read. We recommend using a method to highlight the route to the medical facility(s) and that directions and telephone number be included along with this map.

## 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
CPR:	Cardiopulmonary Resuscitation
CRZ:	Contamination Reduction Zone
EIC:	Engineer-in-Charge
EMS:	Emergency Medical Service
EPA:	Environmental Protection Agency
EZ:	Exclusion Zone
HASP:	Health and Safety Plan
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

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) 363-5556, DSN 864, at any time to discuss your viewpoint. As our customer, your comments and suggestions of how we can improve our services to you are important!*