



DEPARTMENT OF THE NAVY

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From: Commanding Officer, Navy Environmental Health Center
To: Commander, Atlantic Division, Naval Facilities Engineering
Command, Code 1822, Norfolk, VA 23511-6287

Subj: MEDICAL REVIEW OF HEALTH AND SAFETY PLAN FOR NAVAL WEAPONS
STATION, YORKTOWN, VIRGINIA

Ref: (a) LANTNAVFACENCOM ltr 5090 Ser 1822:BRN:srw of 9 Nov 93

Encl: (1) Medical Review of the Preliminary Draft Master Health
and Safety Plan for Naval Weapons Station, Yorktown,
Virginia

1. As requested per reference (a), we completed a medical review of the "Preliminary Draft, Master Health and Safety Plan, Naval Weapons Station, Yorktown, Virginia." Our comments are provided as enclosure (1).

2. The technical point of contact for comments on the review is noted in the enclosure. We are available to discuss the enclosed information by telephone with you and, if necessary, with you and your contractor. If you have any questions, please call Ms. Sheila A. Berglund, P.E., Head, Installation Restoration Program Support Department at 444-7575, extension 430.

W.P. Thomas
W. P. THOMAS
By direction

HEALTH AND SAFETY PLAN REVIEW

Ref: (a) 29 CFR 1910.120
(b) Navy/Marine Corps Installation Restoration Manual (February 1992)

General Comments:

1. The "Preliminary Draft, Master Health and Safety Plan, Naval Weapons Station, Yorktown, Virginia" was prepared for LANTNAVFACENGCOM by Baker Environmental, Inc., and forwarded to the Navy Environmental Health Center on 10 November 1993. The document was dated 29 October 1993.
2. This review addresses both health and safety and emergency response sections of the plan.
3. The method used for the review is to compare the health and safety plan to federal requirements under OSHA regulations (29 CFR 1910.120) and to Department of the Navy requirements under the "Navy/Marine Corps Installation Restoration Manual" (see references (a) and (b) above). We noted deviations and/or differences in the plan from these two primary references.
4. The purpose of this document is unclear. OSHA requires site-specific health and safety plans (HASPs) to be stand alone documents. The stated intent of the master plan is to provide framework and background information common to all HASPs for Naval Weapons Station Yorktown with site-specific information to be provided in each site-specific HASP. While we agree that the more information available to the employees about the site the better, the usefulness of this type of document for reasons other than that of general information appears to be minimal.
5. The point of contact for review of the health and safety plan is Ms. Mary Ann Simmons, Industrial Hygienist, who may be contacted at (804) 444-7575, or DSN 564-7575, extension 477.

Specific Comments:

1. Page 1-2, Section 1.2, "References": The last reference document cited, U.S. EPA's "Standard Operating Procedures," has been updated since July 1988. The latest version is June 1992.
2. Page 3-4, Section 3.4.1, "Chemical Hazards": Chemical/Material Safety Data Sheets were not included as Appendix B as stated in this section. Attachment B, "Procedures to follow in the event of chemical exposures" were not provided either. Recommend using only

Enclosure (1)

one term, appendix or attachment, when referring to sections of the document other than the main body.

3. Page 3-4, Section 3.4.2, "Physical Hazards":

a. Encountering ordnance may be the most serious danger on this site. Recommend including information on this hazard within this section.

b. Section 3.4.2.1, "Confined Space Entry" indicates that confined spaces are not anticipated on this site. However, section 3.4.2.6, "Heavy Equipment," indicates trenches and/or excavations will potentially be part of work activities. Since there appears to be a potential for employee exposure to open trenching/excavations, recommend consideration of establishing confined space entry procedures at the onset of site operations, rather than on an as-needed basis.

4. Page 3-4, Section 3.4.2.2, "Thermal Stress": Attachment A, stated to provide thermal stress monitoring information, is not provided.

5. Page 3-4, Section 3.4.2.3, "Noise": The criteria by which elevated noise will be determined is not included. If hazardous noise levels, in excess of 85 dBA, are encountered, a hearing conservation program is required.

6. Page 3-7, Section 3.4.3, "Radiation Hazards": Provide a basis upon which the site health and safety officer would decide to monitor for radiation hazards.

7. Page 3-8, Section 3.4.4, "Environmental Hazards": The last sentence in this section states that employees will be questioned for sensitivities to flora/fauna. This information is more appropriately ascertained during the completion of the medical history completed in advance to the start of work.

8. Page 5-1, Section 5.0, "Environmental Monitoring":

a. A method to quantify personal exposures to specific chemicals is not included.

b. Discuss the method by which real-time, direct reading instruments will be used to compare employee exposure levels with 8-hour exposure limits.

c. Instruments should be calibrated before and after each use, not just daily.

Appendix A does not provide information on equipment maintenance and calibration as stated in this plan.

9. Page 8-1, Section 8.0, "Emergency Procedures": The first sentence seems to imply that since activities performed on this site are investigative in nature, not remediation, emergency planning in accordance with reference (a) is not required. While the nature of the work

should dictate the level of emergency planning, reference (a) does not allow sections to be omitted simply for convenience. Provide an explanation for this statement or a variance from the Occupational Safety and Health Administration.

10. Page 8-4, Section 8.5, "Emergency Medical Treatment and Telephone Numbers": Conversations with personnel at both Mary Immaculate Hospital emergency room and with Riverside Regional Medical Center emergency room indicate both facilities are capable of treating chemically contaminated patients. Unless there is a good reason otherwise, for simplicity's sake, we suggest specifying the nearer of the two medical facilities as the hospital to be used for any emergency situation.

11. Page 8-7, Section 8.7.2, "Chemical Injury": The Peninsula Poison Control Center has been closed for two years. All phone numbers should be verified and correct points of contact noted in the plan.

12. Page 8-9, Section 8.8, "Emergency Decontamination Procedures": Unless the emergency eye wash bottle said to be located in the Baker Site Trailer and Baker Field Vehicles will provide a minimum of 15 minutes of water flow, recommend deleting the use of this equipment.

13. Page 8-13, Section 8.15, "Spill Containment Procedures": This section indicates that Baker personnel will respond to hazardous material spills or releases. No evidence is provided that the employees have received the additional training required by reference (a) for emergency responders.

14. Page 10-1, Section 10.0, "Medical Surveillance Requirements": Physical examinations should be based on site-specific exposures and site-specific PPE. There is no indication in this section that site-specific information has been considered.

15. A Bloodborne Pathogen program in accordance with 29 CFR 1910.1030 should be established for employees expected to perform first aid.