



DEPARTMENT OF THE NAVY
NAVY ENVIRONMENTAL HEALTH CENTER
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14 May 1996

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

Subj: MEDICAL REVIEW OF INSTALLATION RESTORATION PROGRAM
DOCUMENTS FOR NAVAL WEAPONS STATION YORKTOWN, YORKTOWN, VA

Ref: (a) LANTNAVFACENGCOM memo of 25 Apr 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 "Health and Safety Plan for Site Screening Areas 3 and 7, Naval Weapons Station Yorktown, Yorktown, 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 Ms. Mary Ann Simmons at (804) 363-5556 or Mr. Donald Coons at (804) 363-5547. DSN prefix is 864.

W. E. Luttrell
W. E. LUTTRELL
By direction

HEALTH AND SAFETY PLAN REVIEW

Ref: (a) 29 CFR 1910.120 (Hazardous Waste Operations and Emergency Response)
(b) Navy/Marine Corps Installation Restoration Manual (February 1992)

General Comments:

1. The "Health and Safety Plan for Site Screening Areas 3 and 7, Naval Weapons Station Yorktown, Yorktown, Virginia, Contract N62470-93-D-3032, Delivery Order No. 0098," was prepared for LANTNAVFACENGCOM, by OHM Remediation Services Corp. and forwarded to the Navy Environmental Health Center on 2 May 1996. The document is dated 29 March 1996.
2. The method for the review is to compare the health and safety plan (HASP) 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. A list of acronyms used in our comments is included as Attachment (1).
3. The point of contact for review of the HASP is Ms. Mary Ann Simmons, Industrial Hygienist, who may be contacted at (804) 363-5556. The DSN prefix is 864.

Specific Comments:

1. Page 2-1, Section 2.0, "Key Personnel and Management":

Comment: A company official has not been designated to establish communications with all potential emergency responders prior to starting site work.

Recommendation: Designate this responsibility in the final HASP.

2. Page 3-4, Section 3.3.2, "Biological Hazards":

Comment: Ticks are mentioned as potential health hazards. They may act as vectors of such diseases as Colorado Tick Fever, Rocky Mountain Spotted Fever and Lyme Disease.

Recommendation: In addition to encouraging using repellants, we recommend providing additional methods by which employees may avoid ticks, such as periodic self checks and using the "buddy system" to check each other.

Enclosure (1)

3. Page 3-32, Section 3.4.6, "Job Safety Analysis for Tank Removal and Cleaning":

Comments:

a. Under the "Hazard Control Measures" for the Tank Cleaning task, the last bullet states that the rinsate residue should be handled as "red water." There are no additional details or instructions describing what this entails.

b. It is not clear if the tank will be entered when it is being cleaned. If it is, this would be a confined space entry and confined space entry procedures as described in 29 CFR 1910.146 must be followed.

Recommendations:

a. Include a description of proper handling of the rinsate residue.

b. If the tank will be entered, include confined space entry procedures consistent with 29 CFR 1910.146.

4. Page 3-41, Section 3.5.3, "Subcontractors":

Comment: It is not stated that contractors will submit their own task-specific hazard analyses, as well as medical and training certification.

Recommendation: We recommend that all subcontractors provide their own site-specific, job safety analysis prior to start of site operations. Also, copies of medical and training certifications should be maintained onsite.

5. Page 8-1, Section 8.1, "Pre-Emergency Planning":

Comment: A map showing the route and written directions to the emergency medical facility(s) is not provided.

Recommendation: Include a map that clearly shows the proper route to the emergency medical facility(s) in the final HASP. Additionally, we recommend including written directions and emergency telephone numbers for the medical facility(s) along with the map.

6. Page 8-3, Table 8.1, "Emergency Telephone Numbers":

Comment: Telephone numbers for contacting the NOSC/NOSCDR or the LEPC are not provided. It is not clear which hospital, Riverside or Mary Immaculate, will be used in an emergency. The telephone number for Mary Immaculate Hospital is for their human resource office. The "877" prefix for the points of contact at Yorktown is incorrect.

Recommendation: Include telephone numbers for the NOSC/NOSCDR and the LEPC in the final document. Identify which hospital will be used in an emergency and include its correct emergency telephone number and written directions. Change the "877" prefix to "887." Verify all emergency telephone numbers prior to start of site work.

7. Pages 8-4 - 8-5, Section 8.3.2, "On-Site Emergency Coordinator Duties":

Comment: The third bullet in the first paragraph states that the Emergency Coordinator will notify the local emergency response team if assistance is needed. The first paragraph on Page 8-5 directs the Emergency Coordinator to notify the police department and the Office of Emergency Management "if the incident may threaten human health or the environment outside of the site," and, finally, the second paragraph on Page 8-5 directs notification of the National Response Center "when required." It is not clear who the initial emergency point of contact should be in an emergency situation.

Recommendation: The final plan should clearly describe the initial emergency contact.

8. Page 8-8, Section 8.6.2, "Procedure for Containing/Collecting Spills":

Comment: It is unclear if OHM personnel or outside agencies will respond to emergencies such as chemical spills.

Recommendation: If OHM personnel are expected to be emergency responders, describe the additional training they will receive to safely act in this capacity.

ACRONYMS

ACGIH:	American Conference of Governmental Industrial Hygienists
AG:	Acid Gas
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
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: (804) 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 (804) 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!