



RESPONSE TO COMMENTS FROM TECHNICAL REVIEW
of
CTO-0059
Draft Health and Safety Plan Supplement
Phase II RI/FS at Marine Corps Air Station (MCAS) El Toro, California

Originator: Lawrence Vitale, DOD Section, California Regional Water
Quality Control Board - Santa Ana Region
Date: 13 January, 1995

SPECIFIC COMMENTS:

COMMENT 1: Many personnel and contractors/subcontractors are listed, however responsibilities and chains-of-command are not listed or referenced.

RESPONSE 1: Section 3.4 states that authorized field representatives for subcontract personnel will be identified within 10 days of initiating each field activity involving a CTO-0059 subcontractor. Field activities for CTO-0059 are anticipated to begin in June 1995, therefore identification of the subcontractors and their representatives is not possible at this time (February 1995) due to subcontractor selection which will not be performed until approximately six weeks before field activities are initiated. Upon selection of the subcontractors, their field representatives and Health and Safety Coordinators shall be identified in a addendum to the Phase II RI/FS Health and Safety Plan Supplement. Also at this time the Bechtel SHSO and other project specific Health and Safety personnel not yet identified will be selected and included in the addendum. Responsibilities and chains-of-command were added in the Navy CLEAN II Program Health (to be provided to BCT) and Safety Plan and the Navy CLEAN II Program Procedures, Volume 4.

COMMENT 2: Only information on PCB surveillance is included in this draft Health and Safety Plan.

RESPONSE 2: Training and medical surveillance are addressed in the Navy CLEAN II Program Health and Safety Plan (to be provided to BCT) and the Navy CLEAN II Program Procedures, Volume 4.

COMMENT 3: The pre-entry briefing protocol is not discussed in this draft Health and Safety Plan.

RESPONSE 3: The pre-entry briefing protocol is addressed in the Navy CLEAN II Program Health and Safety Plan (to be provided to BCT) and the Navy CLEAN II Program Procedures, Volume 4.

COMMENT 4: Appropriate SOP's not discussed or referenced in this draft Health and Safety Plan.

RESPONSE 4: Plan as Attachment 1. A copy of the Navy CLEAN II Site Health and Safety Plan, Revision 1 07/94 will be provided to the BCT.



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Originator: Vish Parpiani, AC/S Environmental, MCAS El Toro
Date: 19 December, 1994

GENERAL COMMENTS:

None.

SPECIFIC COMMENTS:

COMMENT: Section 16 - Emergency Response: Nearest Hospital shown is Western Medical Center at Tustin. But nearer hospital is Irvine Medical Center - roughly two miles.

RESPONSE: Section 16.1 has been revised to show that the closest hazardous material exposure emergency medical facility to MCAS El Toro is the Irvine Medical Center at 16200 Sand Canyon Avenue, Irvine, California 92718. Irvine Medical Center was contacted and information was obtained indicating that since the emergency room operated 24 hours a day, it was qualified to treat personnel who have been exposed to hazardous materials.



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Originator: Jan Corbett, SWDIV, Code 1852.JC
Date: 9 December, 1994

GENERAL COMMENTS:

COMMENT A: The draft Site Health and Safety Plan (SHSP) does not adequately address the following sections per reference (a) and (c). worker First Aid/CPR training; use of the "buddy system" during work activities; emergency alerting mechanism; identification of health and safety personnel. Although this is substantially complete for the draft form, the final health and safety plan must address these areas.

COMMENT B: All tables and figures must be complete in the final plan.

SPECIFIC COMMENTS:

COMMENT A: Page 3-2, Section 3.4: All health and safety personnel must be identified in the final plan.

RESPONSE A: These areas have been addressed in the Navy CLEAN II Program Health and Safety Plan previously submitted.

RESPONSE B: These items have been addressed below in the responses to specific comments.

RESPONSE A: Section 3.4 states that authorized field representatives for subcontract personnel will be identified within 10 days of initiating each field activity involving a CTO-0059 subcontractor. Field activities for CTO-0059 are anticipated to begin in June 1995, therefore identification of the subcontractors and their representatives is not possible at this time (February 1995) due to subcontractor selection which will not be performed until approximately six weeks before field activities are initiated. Upon selection of the subcontractors, their field representatives and Health and Safety Coordinators shall be identified in a addendum to the Phase II RI/FS Health and Safety Plan Supplement. Also at this time the Bechtel SHSO and other project specific Health and Safety personnel not yet identified will be selected and included in the addendum.



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COMMENT B: Page 4-1, Table 4-1: All tables must be completed in the final plan.

RESPONSE B: Tables 3-1, 4-1, 4-2, and 16-3 along with the listings for the Hazardous Materials Spill Containment Team (IDW Storage Area) and the Activity Emergency Response Contacts cannot be completed as stated in **Response A**. All other tables in the Phase II RI/FS Health and Safety Plan Supplement are completed.

COMMENT C: Page 4-2, Table 4-2: Please verify that the correct RPM is listed in this table.

RESPONSE C: The correct RPM, Mr. Jason Ashman, has been listed in Table 4-2.

COMMENT D: Page 6-1, Section 6.3.1: Please be aware that aircraft noise may exceed 114 dBA and double hearing protection may be necessary for personnel. Please assure that runways are kept free of debris which may harm aircraft engines.

RESPONSE D: Section 6.3.1 has been revised to reflect that aircraft noise may exceed 114 dBA and double hearing protection (ear plugs and muffs) will be required for all field personnel to don when aircraft are operating. A section covering foreign object debris (FOD) has been incorporated into Section 5, Section 5.2.6 Foreign Object Debris, to assure that runways will be kept free of debris which may harm aircraft engines and cause excess noise.

COMMENT E: Page 7-1; Section 7.1: Please clarify the last sentence in this section.

RESPONSE E: Section 7.1 has been revised to reflect that all field operations will comply with the MCAS El Toro Investigation-Derived Waste (IDW) Management Plan, which establishes appropriate site-storage, labeling, and transportation control procedures.

COMMENT F: Page 8-2; Section 8.10.2: Please provide further clarification on who is responsible for the storage, labeling, testing, and disposal of this waste.

RESPONSE F: Section 8.10.2 has been revised to reflect that the IDW Management Plan for MCAS El Toro specifies the procedures and responsible personnel for the storage, labeling, testing, and disposal of materials generated as a result of decontamination operations.



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COMMENT G: Page 11-1; Section 11: This section does not mention use of the buddy system.

RESPONSE G: Section 11-1 has been revised to include that all personnel within controlled areas are required to comply with the CLEAN II buddy system policy as specified in the Section 2.8.4 of the Program Health and Safety Plan.

COMMENT H: Page 16-5; Figure 16-1: Please outline the route to the hospital.

RESPONSE H: The route to the hospital has been outlined on Figure 16-1.

COMMENT I: Page 16-7, Section 16.8: Please clarify the emergency alerting system which will be used during the project.

RESPONSE I: Section 16.8 has been revised to reflect that each CTO-0059 field team will be provided with mobile phones or communication radios. These devices will be operated by the SHSO or field team leader as the primary method of alerting field personnel and others in the nearby vicinity of emergency conditions. These communications will also be used to contact outside agencies and/or hospitals to facilitate immediate emergency responses.

- References:
- (a) Navy/Marine Corps Installation Restoration Manual, Feb. 1992
 - (b) Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities. NIOSH/OSHA/USCG/EPA. October 1985.
 - (c) 29 CFR 1910.120
 - (d) 29 CFR 1910.165
 - (e) California Code of Regulations, Title 8 Section 5192
 - (f) 29 CFR 1910.1030
 - (g) 29 CFR 1910.1200
 - (h) 29 CFR 1910.134
 - (i) US Army Corps of Engineers Safety and Health Requirements Manual