

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4  
245 West Broadway, Suite 425  
Long Beach, CA 90802-4444  
5310 590-4868

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MCAS EL TORO  
SSIC # 5090.3



January 20, 1995

Mr. Wayne D. Lee  
Assistant Chief of Staff  
Environment and Safety  
Marine Corps Air Station El Toro  
P.O. Box 95001  
Santa Ana, California 92709-5001

DRAFT HEALTH AND SAFETY PLAN COMMENTS FOR THE PHASE II RI/FS MARINE  
CORPS AIR STATION EL TORO

Dear Mr. Lee:

The Department of Toxic Substances Control (Department) has received the enclosed Regional Water Quality Control Board, Santa Ana Region comments on the above mentioned document.

The Department will coordinate, upon request, a comment resolution phone call or meeting on these or the Departments comments which were previously submitted. We look forward to working with you on this project.

If you have any questions, please call me at (310) 590-4919.

Sincerely,

A handwritten signature in cursive script that reads 'Juan Manuel Jimenez'.

Juan Manuel Jimenez,  
Associate Hazardous Substances Scientist  
Base Closure Unit, Region 4  
Office of Military Facilities

Enclosures

cc: Ms. Bonnie Arthur  
U.S. Environmental Protection Agency  
Region IX  
Hazardous Waste Management Division, H-9-2  
75 Hawthorne Street  
San Francisco, California 94105

Mr. Wayne D. Lee  
January 20, 1995  
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Mr. Joseph Joyce  
BRAC Environmental Coordinator  
Department of the Navy  
Naval Facilities Engineering Command  
Environmental Division  
1220 Pacific Highway, Room 18  
San Diego, California 92132-5181

Mr. Lawrence Vitale  
Remedial Project Manager  
California Regional Water Quality Control Board  
2010 Iowa Avenue, Suite 100  
Riverside, California 92507-2409

Mr. Dante J. Tedaldi, Ph.D., P.E.  
BECHTEL National Inc.  
401 W. "A" Street, Suite 1000  
San Diego, California 92101-7905

Mr. Jason Ashman  
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1220 Pacific Highway, Room 18  
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# Memorandum

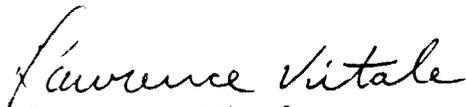
**To:** Mr. Juan Jimenez **Date:** January 13, 1995  
Department of Toxic Substances Control  
245 West Broadway, Suite 425  
Long Beach, CA 90802

**From:** CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - SANTA ANA REGION  
2010 IOWA AVENUE, SUITE 100, RIVERSIDE, CALIFORNIA 92507-2409  
Telephone: CALNET 632-4130 Public (909) 782-4130

**Subject:** DRAFT HEALTH AND SAFETY PLAN FOR PHASE II RI/FS MARINE CORPS  
AIR STATION EL TORO

We have reviewed the subject report dated 11/9/94 and received by us on 12/16/94. Attached, you will find our comments provided by our Industrial Hygienist. Please include our comments with the other CAL/EPA comments for submittal to the Navy.

If you have any comments or questions please call me at 909-782-998.

  
Lawrence Vitale  
DOD Section

SITE NAME: Marine Corps Air Station, El Toro (Draft HASP)  
SITE DESCRIPTION: Phase II RI/FS CTO-0059  
STAFF: Larry Vitale REGION: 8  
WRITTEN SITE SPECIFIC SAFETY AND HEALTH PLAN REVIEW  
(REFERENCE: T8 CCR 5192)

Organization Structure:

✓ **This section must contain:**

- (1) names and responsibilities of site personnel, including person responsible for site health and safety.

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

Comprehensive Workplan:

✓ **This section must contain:**

- both the tasks and the objectives of the tasks for site activities;  
 if contractor/subcontractor is used, information on site health and safety hazards must be supplied.

Comments:

Site Characterization and Analysis:

✓ **This section must contain:**

- location and size of site;  
 duration of planned employee activity;  
 site topography and accessibility;  
 safety and health hazards expected at the site (including their chemical and physical properties);  
 any pathways for hazardous substance dispersion.

Comments:

Site-Specific Safety and Health Plan:

✓ **This section must contain:**

- the safety and health risk or hazard analysis for each site task;  
 the personal protective equipment required for each site task (including selection criteria);  
 (2) training and medical surveillance: see next page;  
 air monitoring implementation (including equipment maintenance and calibration techniques);  
 site control (including on site communication and work zone delineation);  
 decontamination procedures for personnel and equipment;  
 an emergency response plan (including evacuation routes, personnel roles, emergency recognition and prevention, emergency medical treatment, reporting procedures);  
 a confined space entry procedure (if applicable);  
 a spill containment program;  
 (3) pre-entry briefing protocol; *not discussed in this draft HASP.*  
 (4) and the employer's SOPs (they can be listed or appropriate SOPs referenced in an attachment or appendix). *not discussed or referenced in this draft HASP.*

Comments:

Safety and Health Training Program:

✓ This section must contain:

- information on work practices to minimize risks from hazards;
- use of control methods;
- training on safety, health and other hazards present on the site;
- amount of training hours required for worksite activities (24, 40, or 48 hours of training, plus any additional training required for worksite activities).

Comments:

Medical Surveillance Program:

✓ This section must contain:

- information on which employees are covered by the medical surveillance program;
- 2 the elements of the medical program;
- the frequency of the medical examinations.

Comments: Only information on PCB medical surveillance is included in this draft HASP. CLEAN II HASP - JULY 1994 is referenced but is not available in this office. Therefore a review of this section cannot be conducted.

Other Safety and Health Plan review comments:

Items identified as ① ② ③ and ④ were located and evaluated in the Navy CLEAN II Rev D 01/04/94 document. If changes in the CLEAN II HASP Rev I 07/94 are not significant, the review of the above identified section is complete, and require no further comment.

This review of the site specific safety and health plan referenced, identifies areas of the plan that should have additional comment or documentation, in accordance with the referenced regulation (Title 9 CCR Section 5192). There may be items in this plan that do not comply with that regulation. This review is not intended to substitute for a Cal OSHA inspection (the jurisdictional agency for enforcement of the referenced regulation), and an inspection of this type may find and cite non-compliant issues.

REVIEW CONDUCTED BY: Cynthia Paulo Industrial Hygienist

DATE: Jan 6, 1994