

**RESPONSES TO NAVY COMMENTS RECEIVED ON THE DRAFT ACCIDENT PREVENTION PLAN, ADDITIONAL SOIL, GROUNDWATER, AND SOIL GAS SAMPLING INVESTIGATION AT INSTALLATION RESTORATION SITE 17 AND BUILDING 503 AREA, MARE ISLAND NAVAL SHIPYARD, VALLEJO, CALIFORNIA**  
**July 14, 2008**

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The following presents the ChaduxTt responses to Navy comments on the Draft Accident Prevention Plan (APP) for Additional Soil, Groundwater, and Soil Gas Sampling Investigation at Installation Restoration Site 17 and Building 503 Area, Mare Island Naval Shipyard (Mare Island), Vallejo, California. Navy comments were provided by Mr. Arno Bernardo, Naval Facilities Engineering Command (NAVFAC) Southwest Division, dated July 9, 2008.

**RESPONSES TO COMMENTS FROM NAVFAC SOUTHWEST DIVISION**

**Specific Comments**

1. **Comment:** **Page 11: Who's the NHSO and SHSR by name? This section 4.0 (Responsibilities and Lines of Authority) provided names to the various other positions.**

**Response:** ChaduxTt revised the text to include the ChaduxTt Navy Health and Safety Officer's name (Dave Brown).

2. **Comment:** **Page 11: The org. chart provided the lines of authority for the operational work. The chart, however, doesn't depict the lines of authority for safety and health at both corporate and project level.**

**Response:** ChaduxTt modified the organizational chart to include the lines of authority for health and safety at the program (Dave Brown) and project levels (Kevin Hoch, Site Safety Coordinator).

3. **Comment:** **All AHAs: On the "Training Requirements" block, it shall include or describe the training reqts. for operating the GPS, drill rigs, PSG sampler, training for various sampling methods.**

**Response:** ChaduxTt modified the AHAs to include additional information on what training may be necessary for the task (for example, familiarity with standard operating procedures for installing and retrieving the Beacon Environmental passive soil gas samplers. In addition, the subcontracted driller modified their direct push drilling AHAs to include the specific training that is required for operating a direct push rig.

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July 14, 2008 (CONTINUED)

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4. Comment: All AHAs: On the "Inspection Reqts." block, include daily housekeeping inspections (trip hazards, spills, leaks, etc.)

Response: ChaduxTt modified all AHAs to include housekeeping as a daily inspection requirement.

5. Comment: All AHAs: The JHA/SWP for direct push drilling provided by WDC described rotating hazards. The EM 385 requires those rotating or moving parts should be guarded when exposed to contact by persons or when they could be hazardous. Pls. provide information that a guard system isn't required or other means to protect worker from moving parts exposure.

Response: The direct push drill rig that will be used during this project has moving parts in the form of engine fans, drive shafts, and pump shafts, which are guarded on the Geoprobe. No additional guarding is necessary; thus, no changes were made to the text or AHAs as a result of this comment.

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Beatrice Appling  
Naval Facilities Engineering Command  
Southwest Division  
1220 Pacific Highway, Bldg 127  
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DATE: 07/15/08  
CTO: 0028  
LOCATION: Mare Island Naval Shipyard, Vallejo, California

FROM:   
Steven Bradley, Contract Manager

DOCUMENT TITLE AND DATE:

**Responses to Navy Comments on the Draft Accident Prevention Plan, Additional Soil, Groundwater, and Soil Gas Sampling Investigation at Installation Restoration Site 17 and Building 503 Area,**

**July 14, 2008**

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