

RESPONSES TO NAVY COMMENTS RECEIVED ON THE DRAFT HEALTH AND SAFETY 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

The following presents the ChaduxTt responses to Navy comments on the Draft Health and Safety Plan (HASP) 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. Kenneth G. Astley, Navy and Marine Corps Public Health Center, dated July 11, 2008.

RESPONSES TO COMMENTS FROM THE NAVY AND MARINE CORPS PUBLIC HEALTH CENTER

General Comments

1. **Comment:** We compared this health and safety plan (HASP) to federal requirements found in references (a) through (d), and have noted discrepancies in this HASP from these primary references.

Response: Comment noted.

2. **Comment:** This scope of work does not appear to involve operations at an “uncontrolled” hazardous waste site involving employee exposure or the reasonable possibility for employee exposure to safety or health hazards. Specifically, it does not appear that the passive soil gas survey, soil sampling, groundwater sampling and active soil gas sampling will result in any type of exposure that may result in an undesirable health effect. Therefore, it is not clear whether a site-specific health and safety plan meeting the requirements of references (a) and (b) is required. With that said, and if the regulators concur, the following issues would need to be addressed in lieu of a HASP:

- A written hazard communication plan meeting the requirements of 29 CFR 1910.120.
- All assigned personnel to be in a medical surveillance program as required and medical evaluations must be current.
- Availability of a portable eye wash station meeting ANSI Standard 358.1-2004 or later criteria.
- Stress good personal hygiene; including no eating, drinking, smoking, or applying cosmetics in the work (EZ) zone, and upon exiting the work zone, that all personnel thoroughly wash their

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(CONTINUED)

face, hands and arms before performing any hand to mouth activity/function.

- **Use appropriate PPE as determined by the site safety officer.**
- **Site-specific training.**
- **Emergency response/emergency action plan, first aid, posting of telephone numbers for all potential emergency response organizations.**

The above bulleted information is generally contained within the HASP (if applicable).

Response: Comment noted. However, it is ChaduxTt's corporate policy that a HASP be implemented for any type of fieldwork to be performed at a site. By preparing the HASP, ChaduxTt also remains in accordance with Occupational Health and Safety Act (OSHA) and California/OSHA protocols.

3. **Comment: The text includes written directions and a map to the medical facility that will be used in emergency situations. However, the text does not state if the local naval medical facility can be used in emergency situations.**

Response: ChaduxTt staff will be advised to use the Sutter Solano Medical Center, which has trauma unit medical capabilities and is located off-base and adjacent to Mare Island. No local naval medical facility is currently located at Mare Island.

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FROM:



Steven Bradley, Contract Manager

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July 14, 2008

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