



DEPARTMENT OF THE NAVY
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From: Commanding Officer, Navy and Marine Corps Public Health Center
To: DEPARTMENT OF THE NAVY, Naval Facilities Engineering Command, Engineering Field Division Southwest (Marie Dreyer, Code REVR.LP, 1220 Pacific Highway, San Diego, CA 92132-5190)
Subj: COMMENTS ON THE SITE DRAFT HEALTH AND SAFETY PLAN FOR ADDITIONAL SOIL, GROUNDWATER, AND SOIL GAS SAMPLING INVESTIGATION AT INSTALLATION RESTORATION SITE 17 AND BUILDING 503 AREA MARE ISLAND NAVAL SHIPYARD, VALLEJO, CALIFORNIA
Ref: (a) E-mail NAVFAC SOUTHWEST, Marie Dreyer/NMCPHC, D. J. Coons, of 2 July 2008

Encl: (1) Subject Health and Safety Plan Review

1. Per reference (a), we have completed a review of the subject document and are forwarding our comments to you as enclosure (1).

2. We are available to discuss the enclosed information by telephone with you and, if you desire, with you and your contractor. If you require additional assistance, please call Mr. Kenneth G. Astley at (757) 953-0937 or Mr. David McConaughy at (757) 953-0942. The DSN prefix is 377. The e-mail addresses are: Kenneth.Astley@med.navy.mil and David.McConaughy@med.navy.mil.

A handwritten signature in cursive script, appearing to read "Y. P. Walker".

Y. P. Walker
By direction

Copy to:
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NAVY AND MARINE CORPS PUBLIC HEALTH CENTER ENVIRONMENTAL PROGRAMS DEPARTMENT

Health and Safety Plan Review

Location: Vallejo, California

Command: Mare Island Naval Shipyard

Site: Site 17 and Building 503 Area

Work Description: Sampling Investigation

Document Date: 2 July 2008

Contract No/Contract Task Order No: N62473-07-D-3213/0028

EP Document No: 1914

Prepared for: Engineering Field Division Southwest

Prepared by: ChaduxTt

Date Received: 3 July 2008

Reviewed by:

Mr. Kenneth Gene Astley, (757) 953-0937, Kenneth.Astley@med.navy.mil, DSN 377

HEALTH AND SAFETY PLAN REVIEW

- Ref: (a) 29 CFR 1910.120 (Hazardous Waste Operations and Emergency Response)
(b) 29 CFR 1926.65 (Hazardous Waste Operations and Emergency Response)
(c) Department of the Navy Environmental Restoration Program Manual (August 2006)
(d) U. S. Army Corps of Engineers, Safety and Health Requirements Manual, EM 385-1-1

General Comments:

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

2. 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 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).

2. 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.