

Accident Prevention Plan and 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 (current edition)

The Navy and Marine Corps Public Health Center (NMCPHC) has completed a review of the draft Accident Prevention Plan (APP), Site Safety and Health Plan (SSHP) and Activity Hazard Analyses (AHAs) for Former Naval Station Treasure Island, Soil Removal at Solid waste Disposal Areas, Site 12. The documents have been reviewed and compared to the requirements of references (a) through (d). Comments are provided in the following table. The acronyms used in our comments are included at the end of the comment table.

No.	Page(s)	Section No. and Title	Comment	Recommendation	Contractor Response
1	APP, 2-2 9-2 9-3	2.0, "Background Information" 9.10, "Lead Abatement Plan" 9.11, "Asbestos Abatement Plan"	It is not clear whether removal of concrete, including jack hammering will be performed under this task order, or whether this will be included during building demolition. Lead and asbestos work will be performed. The subcontractors will provide abatement plans prior to the start of work.	If removal of concrete will be performed by site workers under this task order, include a crystalline silica monitoring plan in the APP, applicable information in the site characterization section of the SSHP, and develop an Activity Hazard Analysis. Prior to lead or asbestos abatement, ensure the abatement plans are provided to the ROICC office or Government Designated Authority (GDA) for approval.	
2	APP	Section 4.1, "Lines of Authority" and Section 5.2, "Subcontractor/ Supplier Safety Responsibilities."	Section 5.2 states subcontractors will report directly to the Project Manager (PM). Is this correct? Section 4.2 indicates the PM may not always be on the worksite.	From a safety and health perspective we question whether it may be more appropriate for subcontractors to report directly to the Health and Safety Manager (HSM) or the Site Safety and Health Officer (SSHO).	
3	APP 6-1	Section 6.2, "Mandatory	There is no reference the SSHO has completed the OSHA 30-Hour	Ensure the SHSO has completed training meeting the requirements of	

No.	Page(s)	Section No. and Title	Comment	Recommendation	Contractor Response
	SSHP 2-1	Training and Certifications” Section 2.0 “Employee Training”	Construction Safety. It is not clear whether a policy is in place that new hire safety and health orientation training is provided at the time of initial hire and that procedures are in place for periodic safety and health training for supervisors.	the of the OSHA 30-Hour Construction Safety Course.	
4	APP 9-3 Attach 2	9.15, “Crystalline Silica Monitoring Plan” AHA 2, Demolition of Buildings and Pavement”	Demolition and removal of paved surfaces will be conducted. Section 9.15 states a Crystalline Silica Monitoring plan is not required. The Activity Hazard Analysis (AHA) for demolition and removal of paved surfaces does not include an evaluation of the work operation with regards to silica.	Provide an evaluation of whether employees removing concrete may be exposed to crystalline silica. Document the information within the AHA or provide a Crystalline Silica Monitoring Plan meeting the requirements of Section 06.M of reference (d).	
5	APP	Figure 2, “Lines of Authority”	The NAVFAC South West Safety Office is not included in the flow chart.	If required, include the NAVFAC South West Safety Office.	
6	SSHP 1-1	Section 1-1, “Contamination Characterization”	As stated above, if jack hammering concrete will be conducted under this scope of work provide characterization information for silica.		
7	SSHP Encl. 2	AHA 1-Site Surveys	Utility lines will be marked with color-coded marking paint. We assume the color codes are according to standards established by the American Public Works Association. Will site workers know how to interpret the color-coded marking paint?	Ensure site workers are familiar with the color codes prior to starting intrusive activity. It may be appropriate to provide a color code chart and/or include the topic in the initial safety briefings.	
8	SSHP Encl. 3	Emergency Telephone Numbers	The restoration program manager, Anthony Konzen, and the South West Safety Office, Mario Erasquin, are not included.	Consult with the ROICC Office, Izzat Amadea, to determine whether the RPM and the Safety Office should be included.	

ACRONYMS LIST

AHA	Activity Hazard Analysis
APP	Accident Prevention Plan
CFR	Code of Federal Regulations
CPR	Cardiopulmonary Resuscitation
HAZWOPER	Hazardous Waste Operations and Emergency Response
FA	First Aid
IRP	Installation Restoration Program
MSDS	Material Safety Data Sheet
NMCPHC	Navy and Marine Corps Public Health Center
NRR	Noise Reduction Rating
OEL	Occupational Exposure Limit
OSHA	Occupational Safety and Health Administration
PEL	Permissible Exposure Limit
PPE	Personal Protective Equipment
RPM	Remedial Program Manager
SME	Subject Matter Expert
SSHP	Site Safety and Health Plan
UST	Underground Storage Tank

**NAVY AND MARINE CORPS PUBLIC HEALTH CENTER
ENVIRONMENTAL PROGRAMS DEPARTMENT**

**Accident Prevention Plan and
Site Safety and Health Plan Review**

Location: Treasure Island, San Francisco, CA

Command: Former Naval Station Treasure Island

Site: Bigelow Court Solid Waste Disposal Area, Site 12

Work Description: Non Time Critical Removal Action

Document Date: August 2012

Contract No. /Contract Task Order: N62473-10-D-0807/0010 Revision 1

EP Document No: 3370

Prepared for: EFD Southwest/Anthony Konzen (RPM)

Prepared by: Shaw

Received: 23 August 2013

Date Comments Provided: 17 September 2013

Reviewed by: Mr. David McConaughy, (757) 953-0942;
david.mcconaughy@med.navy.mil; DSN: 377