

3/13/01-3043



DEPARTMENT OF THE NAVY
NAVY ENVIRONMENTAL HEALTH CENTER
2510 WALMER AVENUE
NORFOLK, VIRGINIA 23513-2617

5090.5
Ser EP1476/ 11307
13 MAR 2001

From: Commanding Officer, Navy Environmental Health Center
To: Commanding Officer, Atlantic Division, Naval Facilities Engineering Command
(Kirk Stevens), 1510 Gilbert Street, Norfolk, VA 23511-2699

Subj: DRAFT FINAL HEALTH AND SAFETY PLAN FOR SUPPLEMENTAL FIELD
INVESTIGATION, SITE 89, OU #16, MARINE CORPS BASE CAMP LEJEUNE, CAMP
LEJEUNE, NC

Ref: (a) LANTNAVFACENCOM e-mail of 20 Feb 01

Encl: (1) Subject Health and Safety Plan Review
(2) Medical/Health Comments Survey

1. Per reference (a), we have completed a review of the subject document and are forwarding our comments to you as enclosure (1).
2. Please complete and return enclosure (2) as your comments are needed to continually improve our services to you.
3. 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. Donald J. Coons at (757) 462-5547 or Mr. David McConaughy at (757) 462-5557. The DSN prefix is 253. The e-mail addresses are: coonsd@nehc.med.navy.mil and mcconaughyd@nehc.med.navy.mil.

Andrea Lunsford
ANDREA LUNSFORD
By direction

Copy to: (w/o Encl (2))
CNO (N-453)
NAVFAC (ENC/KA)
BUMED (MED-24)
MCB Camp Lejeune (ACS EMD/IRP, Tom Morris)
CMC (LFL)

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) Navy/Marine Corps Installation Restoration Manual (February 1997)
(d) U. S. Army Corps of Engineers, Safety and Health Requirements Manual, EM 385-1-1

General 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. The acronyms used in our comments are included as Attachment (1).

Administrative Comment: Activity hazard analyses (AHAs) for the various tasks to be performed under this scope of work were not provided with this document. Therefore we could not review or provide comments. We recommend use of the three-column format found in reference (d), page 4, Figure 1-1, for its clarity and ease in use.

Specific Comments:

1. Pages 2-1 through 2-2, "Site Organization and Coordination":

Comments:

a. In the first paragraph, fourth bullet, the Site Health and Safety Officer is listed as "to be determined (TBD)." As this is a site-specific document this information should be readily available.

b. The second paragraph entitled, "Subcontractor personnel are responsible for:" provides no information stating that the subcontractor(s) will provide site-specific activity hazard analyses (AHAs) for assigned tasks to Baker Environmental, Inc. for approval prior to start of site work.

Recommendations:

a. Assign an appropriate company official as soon as possible so the functions of this important position can be accomplished in a timely manner.

b. We recommend, that at a minimum, subcontractors provide their own AHAs for each task they will perform under this scope of work.

2. Pages 5-1 through 5-2, “Exposure Monitoring”:

Comments:

- a. Section 5.4, “Equipment Calibration,” contains no requirement for “after use” calibration of direct reading air-monitoring equipment.
- b. A method to inform site personnel of monitoring results is not provided.

Recommendations:

- a. Include a requirement in the final site-specific HASP for before and after use calibration of all direct reading air-monitoring equipment in accordance with manufacturer’s recommendations and standard industrial hygiene practice.
- b. Include a method to inform site personnel of monitoring results in the final plan.

4. Pages 8-1 through 8-10, Section 8.0, “Emergency Procedures”:

Comments:

- a. The first sentence of Section 8.1, entitled “Scope,” states “The activities to be conducted under this HASP are not remediation (cleanup), but investigative; . . .” As this scope of work is subject to the requirements of references (a) and (b) above, it is unclear as to why this statement is made.
- b. Section 8.6, “Emergency Hospital Route,” states that an emergency hospital route is located in Figure 8-1. The map is not included with this plan.
- c. In Section 8.8.2, entitled “Chemical Injury,” the last sentence of the first bullet cites “ANSI Standard 2358.1-1990” for emergency eyewash guidance. The correct citation should be “ANSI Standard Z358.1-1990.”
- d. A requirement to periodically exercise and critique the emergency response plan is not provided.

Recommendations:

- a. Clarify why this statement is included in the HASP.
- b. Include the map in the final plan.
- c. Revise the final document and include the correct citation.
- d. Include a requirement in the final health and safety plan.