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**DEPARTMENT OF THE NAVY**NAVY ENVIRONMENTAL HEALTH CENTER
2610 WALMER AVENUE
NORFOLK, VIRGINIA 23513-26175090.5
Ser 61:1139/

From: Commanding Officer, Navy Environmental Health Center
To: Commander, Atlantic Division, Naval Facilities Engineering
Command, (Code 18236), 1510 Gilbert Street, Norfolk, VA
23511-2699

Subj: MEDICAL REVIEW OF INSTALLATION RESTORATION PROGRAM
DOCUMENTS FOR NAVAL STATION ROOSEVELT ROADS, PUERTO RICO

Ref: (a) NAVENVIRHLTHCEN ltr Ser 61:1129/00602 of 22 Feb 95
(b) LANTNAVFACENGCOM Fax of 24 Feb 1995, re: Contract
N62470-89-D-4814, CTO No. 0296
(c) Final Health and Safety Plan for Naval Station
Roosevelt Roads, Puerto Rico

1. Reference (a) provided our comments on the site-specific health and safety plan (HASP) for Site 16, SWMU 45, Naval Station Roosevelt Roads, Puerto Rico. We were asked to evaluate the contractor's response to our comments by reference (b) as shown in reference (c).

2. Some of the comments from reference (a) have been adequately addressed; some have not. Following are the comments we do not feel have been resolved along with our rationale. Comments follow the numbering sequence from reference (b).

a. Comment No.2, Section 2.0, "Site Organization and Coordination": Baker indicates that since only two of their people will be on site the alternate site health and safety officer (SHSO) will automatically be the other person on-site. This is not stated anywhere in the HASP.

b. Comment No. 3(b), Section 3.0, Sub-section 3.2, "Chemical Hazards": Baker states that "The entire list of analytical parameters does not need to be included in the HASP." We concur, however from an occupational exposure point of view, if chemicals of concern are listed in the Work Plan then they need to be addressed in the HASP.

c. Comment No. 4, Sub-section 4.2, "Level C," page 4-2: Our original comment addressed the requirements personnel or visitors must meet prior to site entry. While "Permission from Baker Site Manager" is a pertinent requirement, other requirements that need to be clearly stated should reflect the OSHA training and medical clearance requirements of 29 CFR 1910.120/29 CFR 1926.65.

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d. Comment No. 5(b), Sub-section 5.4, "Equipment Calibration": Calibration in accordance with the manufacturer's instructions and before and after each period of use is designed to ensure that monitoring results are accurate within the instrument's standard sampling error. Both actions are necessary.

e. Comment No. 6, Sub-section 6.1, "Levels of Protection": There have been no changes made in the final HASP.

f. Comment No. 8(a), Section 8.0, "Emergency Preparedness and Evaluation Procedures (EPEP)": If the SHSO has the responsibility to develop necessary communication networks it should be clearly stated.

g. Comment No. 8(b), Section 8.0, "Emergency Preparedness and Evaluation Procedures (EPEP)": If Baker has received permission for their personnel to use the Naval Hospital facilities, it should be so stated.

h. Comment No. 8, d(1), Sub-section 8.7, "Emergency Alerting": Information pertaining to Bloodborne Pathogen training for employees is as relevant as specifying the other training personnel have received prior to performing hazardous waste site operations.

i. Comment No. 8, d(2), Sub-section 8.7, "Emergency Alerting": Information regarding who is empowered to authorize re-entry to a work area after it has been evacuated should be clearly stated.

j. Comment No. 8(e), Section 8.9, "Personal Protection and Emergency Equipment": No changes have been made in the final HASP.

k. Comment No. 8(f): While the short duration of this project is recognized, it would be prudent to establish provisions for periodic drills and critiques of the emergency response plan. Daily site safety briefings would suffice in the interim.

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3. We are available to discuss this information by telephone with you and, if necessary, with you and your contractor. If you require additional assistance, please call Ms. Mary Ann Simmons or Mr. Donald Coons, Physical Science Technician, at (804) 444-7575 or DSN 564-7575, extensions 402 and 334, respectively.

A. F. JONES
By direction



DEPARTMENT OF THE NAVY

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ORIGINAL LETTER TO FOLLOW VIA MAIL: YES or NO

TO: Art Wells CODE: _____

COMMAND: Lant Div

CITY: _____ STATE: _____

COMMERCIAL TELEFAX NUMBER: 322-4805

COMMERCIAL CONFIRM NUMBER: 322 4587

FROM: Don Cous CODE: _____

DATE: 10 Mar 85

PERSON TRANSMITTING FAX: _____

NUMBER OF PAGES INCLUDING THIS SHEET: 4

REMARKS: *signed hard copy will follow next week,
if you have any questions feel free to give us
a call.*

*V/R
Don*

!!NOTICE!!

Thirty-Sixth Navy Occupational Health
and Preventive Medicine Workshop
4 - 10 March 1995 - Hampton, Virginia