



DEPARTMENT OF THE NAVY

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30 JUN 1995

From: Commanding Officer, Navy Environmental Health Center
To: Commander, Atlantic Division, Naval Facilities Engineering
Command, Attn: Katherine Landman, 1510 Gilbert Street,
Norfolk, VA 23511-2699

Subj: MEDICAL REVIEW OF INSTALLATION RESTORATION PROGRAM
DOCUMENTS FOR MARINE CORPS BASE, CAMP LEJEUNE, NC

Ref: (a) Baker Environmental, Inc. transmittal ltr of 10 May 95

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

1. As you requested in reference (a), we completed a medical review of the "Draft Remedial Investigation/Feasibility Study Health and Safety Plan, Operable Unit No. 13 (Site 63), Marine Corps Base, Camp Lejeune, North Carolina." Our comments are provided in enclosure (1).
2. Please complete and return enclosure (2). 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 necessary, with you and your contractor. If you require additional assistance, please call Ms. Mary Ann Simmons at (804) 444-7575 or DSN 564-7575, extension 402.


A. F. JONES
By direction

Blind copy to:
CNO (N-453)
COMNAVFACENGCOM (41)
BUMED (MED-24)

HEALTH AND SAFETY PLAN REVIEW

- Ref: (a) 29 CFR 1910.120 (Hazardous Waste Operations and Emergency Response)
(b) Navy/Marine Corps Installation Restoration Manual (February 1992)

General Comments:

1. The "Draft Remedial Investigation/Feasibility Study Health and Safety Plan, Operable Unit No. 13 (Site 63)" MCB Camp Lejeune, North Carolina, Contract Task Number 0304, was prepared for LANTNAVFACENGCOM by Baker Environmental, Inc. and forwarded to the Navy Environmental Health Center on 16 May 1995. The document was dated 10 May 1995.
2. The method for the review is to compare the health and safety plan (HASP) to federal requirements under OSHA regulations and to Department of the Navy requirements under the "Navy/Marine Corps Installation Restoration Manual" (see references (a) and (b) above). We noted deviations and/or differences in the plan from these two primary references. A list of acronyms used in our comments is included as Attachment (1).
3. The points of contact for review of the HASP are Ms. Mary Ann Simmons, Industrial Hygienist, or Mr. Carlton Davis, Physical Science Technician, who may be reached at (804) 444-7575, or DSN 564-7575, extensions 402 or 335 respectively.

Specific Comments:

1. Page 3-5, Section 3.4, "Chemical Hazards":

Comment: The last sentence states that MSDSs are provided for each chemical listed in Table 3-1. The location of Table 3-1 is not readily apparent.

Recommendation: Indicate that Table 3-1 is found in a tab entitled "Tables" at the end of the plan. Conversely, place Table 3-1 in this section. The same recommendation is made for the other tables located behind this tab.

2. Page 4-2, Section 4.4, "Buddy System":

Comment: This section states that for high-hazard activities a third person will be located in the support zone to act as an observer or rescue person. There is no mention of the availability of emergency equipment he would need to act in a rescue capacity.

Recommendation: If this third person is anticipated for this work, include a requirement that emergency rescue equipment and PPE will be available.

3. Page 5-1, Section 5.0, "Exposure Monitoring":

Comment: Chemicals, other than those measurable by a PID, are listed on Table 3-1, "Toxicological Properties of Chemicals RI/FS Site 63 MCB Camp Lejeune."

Recommendation: Additional sampling methods, such as using a direct reading dust monitor, need to be included. For example, PCBs, metals and pesticides cannot be detected by the PID and are all listed in Table 3-1.

4. Page 5-1, Section 5.4, "Equipment Calibration":

Comment: This section states that the PID will be calibrated daily before use in accordance with manufacturer's requirements.

Recommendation: We recommend calibrating all monitoring equipment before and after each period of use in accordance with good industrial hygiene practice and according to the manufacturer's directions.

5. Page 5-1, Section 5.5, "Monitoring Documentation":

Comment: Weather conditions can have an effect on monitoring equipment and results.

Recommendation: We recommend including weather information (temperature and humidity) as part of the monitoring documentation.

6. Page 6-1, Section 6.1, "Levels of Protection":

Comment: A level of protection was not assigned for personnel decontaminating heavy equipment.

Recommendation: Include an appropriate PPE assignment for these personnel.

7. Page 7-1, Section 7.0, "Decontamination Procedures":

Comments:

a. There are no provisions listed for containerizing and properly disposing of used decontamination liquids.

b. A task-hazard analysis is not included for heavy equipment decontamination.

Recommendation: Include this information in the final HASP.

ACRONYMS

ACGIH:	American Conference of Governmental Industrial Hygienists
AG:	Acid Gas
ANSI:	American National Standards Institute
ATSDR:	Agency for Toxic Substances and Disease Registry
BBP:	Bloodborne Pathogen Program
CPR:	Cardiopulmonary Resuscitation
CRZ:	Contamination Reduction Zone
EIC:	Engineer-in-Charge
EMS:	Emergency Medical Service
EPA:	Environmental Protection Agency
EZ:	Exclusion Zone
HASP:	Health and Safety Plan
HBV:	Hepatitis B Virus
HIV:	Human Immunodeficiency Virus
IDLH:	Immediately Dangerous to Life and Health
LEPC:	Local Emergency Planning Committee
MSDS:	Material Safety Data Sheet
NIOSH:	National Institute for Occupational Safety and Health
NOSC:	Navy On-Scene Coordinator
NOSCDR:	Navy On-Scene Commander
OSHA:	Occupational Safety and Health Administration
OV:	Organic Vapor
PCB:	Polychlorinated Biphenyl
PEL:	Permissible Exposure Limit
PID:	Photoionization Device
PPE:	Personal Protective Equipment
PPM:	Parts Per Million
SCBA:	Self Contained Breathing Apparatus
SOP:	Standard Operating Procedure
STEL:	Short Term Exposure Limit
TLV:	Threshold Limit Value

FROM: _____
 (YOUR NAME/COMMAND)
 TO: NAVENVIRHLTHCEN, ENVIRONMENTAL PROGRAMS
 FAX: COM: (804) 444-7261/DSN: 564-7261

MEDICAL/HEALTH COMMENTS - YOUR VIEW

Please help us improve our review process by indicating the extent to which you agree or disagree about the comments we provided for to your activity.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
1. "Value added" to IR/BRAC process?	1	2	3	4	5
2. Received in a timely manner?	1	2	3	4	5
3. High level of technical expertise?	1	2	3	4	5
4. Very useful to the RPM?	1	2	3	4	5
5. Contractor incorporated comments?	1	2	3	4	5
6. Easily readable/useful format?	1	2	3	4	5
7. Overall review was of high quality?	1	2	3	4	5
8. NAVENVIRHLTHCEN was easily accessible?	1	2	3	4	5
9. NAVENVIRHLTHCEN input during scoping or workplan development would be "value added"?	1	2	3	4	5
10. Added involvement in IR/BRAC document needed?	1	2	3	4	5

Please return by fax using the box provided at the top of this page. If you have any other comments, please list them below or telephone Ms. Mary Ann Simmons, Industrial Hygienist at (804) 444-7575, DSN 564, extension 402, at any time to discuss your viewpoint. As our customer, your comments and suggestions of how we can improve our services to you are important!