

**Baker**

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**Baker Environmental, Inc.**  
Airport Office Park, Building 3  
420 Rouser Road  
Coraopolis, Pennsylvania 15108

(412) 269-6000  
FAX (412) 269-6097

December 12, 1991

Commanding Officer  
Atlantic Division  
Naval Facilities Engineering Command  
Environmental Quality Branch  
Norfolk, Virginia 23511-6287

Attn: Ms. Laurie A. Boucher, P.E.  
Code 1822

RE: Contract No. N62470-89-D4814  
Contract Task Order (CTO) 0024  
Response to Navy Environmental Health Center Comments  
Preliminary Draft Health and Safety Plan for Sites 6, 48,  
and 69, Camp Lejeune, North Carolina

Dear Ms. Boucher:

Please find attached a copy of comments received pertaining to the Preliminary Draft Health and Safety Plan (HASP) for Sites 6, 48, and 69 at Camp Lejeune, North Carolina. Where noted, Baker has revised various sections of the HASP. The itemized responses listed below coincide with the attached commentary outline.

#### EMERGENCY RESPONSE SECTION REVIEW

1. No Action Required
2. Page 25 paragraph 11.2 "Emergency Medical Care"
  - a. Per a discussion with Mr. Thomas Morris (Environmental Management Division, Camp Lejeune), it was decided that in the case of an EMERGENCY, the NEAREST Medical Facility, base or otherwise, would be used. Thus for sites 48 and 69, the Onslow County Memorial Hospital, and for site 6, the Base Naval Hospital.

Due to a change in the Scope of Work, intrusive field investigative activities (i.e., monitoring well installation, surface soil sampling, soil boring, and test pit/trenching) will no longer be performed at site 69, therefore, measures to be taken for surety agent exposure will not be addressed.

Points of Contact with the Medical Treatment Facility and Ambulance Service will be determined immediately prior to the start of site activities. Establishment of contacts in the too distant future, may not be to the projects' advantage given the potential for personnel to change.

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- b. Determination of Code words to be used in the case of medical emergencies will once again be decided immediately prior to project startup when the needs of all personnel involved would be best served.
- c. As above, coordination between all concerned emergency response facilities will be performed prior to project startup, including the development of a code word.

GENERAL COMMENTS SECTION

- a. Section 1.1, page 1. Section has been modified to reflect change as recommended.
- b. Section 1.2, page 1. Section has been modified to reflect change as recommended.
- c. Section 1.4, page 2. Section has been modified to reflect change as recommended.
- d. Section 5.1, page 8. Section has been changed to incorporate suggestion, however, wording is not exactly as recommended.
- e. Section 6.3.3, page 16. Section has been changed to eliminate reference to Cold Exposure. Regarding procedures for heat stress emergency/prevention, a summary is provided in the table, with additional measures to be explored when a date (reflecting the current climate) has been set for project startup.
- f. Section 6.3.4, page 18. Attachment F has been added to reflect SOPs for the UXO Contractor (EHS, Inc.). As applicable SOPs from additional contractors (yet to be determined) are received, they will also be incorporated. It is Baker's policy that all personnel on site are to follow this Health and Safety Plan. However, training on subcontractor SOPs that do not apply to other site personnel will not be required.
- g. Section 7.1, page 19. Subcontractors are required to meet the personal protective equipment (ppe) requirements outlined in Section 7.1, at a minimum. Should subcontractors require additional ppe to provide a higher level of protection for a particular task, incorporation of the additional ppe requirements will be addressed at that time.
- h. Section 7.1, Page 20. Section has been changed to incorporate the recommendation.
- i. Section 10.0, page 24. Modifications to the decontamination procedures for surety exposure will not be considered, given the change to the Scope of Work (see response to "Emergency Response Section" comment 2.a., paragraph 2).
- j. Section 11.3.1, page 31 (formerly page 30). Section has not been modified as recommended because smoking is not permitted within 25 feet of the mercury

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vapor badge at any time regardless of an employees location within a certain work zone.

- k. (1). The medical surveillance requirements outlined in Attachment A apply to Baker personnel only. Contractor personnel requirements are company-specific, but are required, at a minimum, to meet all applicable OSHA requirements as outlined in 29 CFR 1910 and 1926 [refer to Section 1.2, page 2 (revised) verbiage stating such requirements].
- (2). All baker personnel are required to submit to medical surveillance requirements prior to a field assignment if their previous medical exam (baseline) was not conducted within the past year; or, the exam did not meet Baker requirements as outlined in Attachment A.

If you have any questions concerning these responses, please do not hesitate to contact me at (412) 269-2016, or Ms. Barbara Cummings at (412) 269-2029.

Sincerely,

BAKER ENVIRONMENTAL, INC.



Raymond P. Wattras  
Project Manager

RPW/daf  
Attachment

cc: Mr. Marc Lambert, P.E.  
Mr. Steve Chambliss, P.E.