

General Comments on August 13, 1990 Draft Site Health and Safety Program Plan.

The use of a general program plan and a workbook to support preparation of more specific "Site Plans" is a workable approach to health and safety planning for the RFP Environmental Restoration (ER) activities. At this stage, with interim actions and remedial investigations under way, required Site Plans (completed and approved according to the proposed procedures) should be included to show the end product of the Health and Safety planning process.

The Health and Safety Program Plan (HSPP) should include a completed general hazard assessment for the major types of ER activities (well drilling, soil sampling, water sampling etc.). This should be used to establish minimum levels of personnel protection, and decontamination procedures for each general activity type. These can be reevaluated and upgraded as necessary for specific sites and conditions, while adhering to the established minimum. This will promote consistent safety procedures, facilitate field program planning, and streamline Site Plan preparation.

When reference is made within the HSPP to the RFP Health and Safety Practices Manual and/or an ER Standard Operating Procedures (SOP), pertinent portions of the referenced materials should be appended or otherwise supplied for review to comply with Section III of the proposed Interagency Agreement (IAG). Standards and procedures for confined space entry, for instance, do not appear in the documents supplied, and thus cannot be evaluated. In many other instances, the multi-level and sometimes contradictory references make finding pertinent materials difficult or impossible. For a document meant to be used to maintain safety in the field, this is dangerous. For example, decontamination procedures are not mentioned at all in the HSPP; Workbook Chapter 8 covers this question by referring the user to Appendix A, Section 10; this citation provides little real information, and refers to Appendix C of the "HSWB"; apparently meant to indicate Appendix C in the Workbook, though this is not obvious. The person setting up the decontamination area should not have to work so hard to find out what to do.

Statements within the HSPP indicate in some cases that a "Site Plan" will be prepared for each OU. Elsewhere, it says they will be done for each "project" or "activity". Please define clearly if each OU will have an OU Plan, and more specific site plans within that; or how projects/activities warranting separate plans will be identified; and what the review process by parties outside DOE will be for the many anticipated site plans.

ADMIN RECORD

A-SW-000630

Given the many organizational entities within DOE and EG&G apparently involved in plan approval, the prospects for confusion over decision-making authority in the field are excellent. This was brought to light during implementation of phase I-A of the OU 1 Interim Measure/Interim Remedial Action (IM/IRA). For example, the HSPP shows at least two parties with authority to issue stop work orders. Assuming they can both lift such orders too, chaos will result when they disagree. Authorities and responsibilities must be defined so they are explicit, unambiguous, and free of contradiction or overlap. As a result of the incidents related to OU 1 IM/IRA phase I-A construction, there was discussion about eliminating matrix management from ER activities. This is not reflected in the draft HSPP. It is EPA's position that specific required activities associated with ER projects should not be matrix managed, but should be directly controlled by the ER program.

This plan must also address in detail the site monitoring to be performed before entry and during remedial investigation activities. Site monitoring must be capable of identifying potentially hazardous operations and prescribing appropriate protective measures before unacceptable exposures occur. This plan must provide information about monitoring instruments to be used; criteria for personnel protection based on monitoring data; procedures and responsibilities for obtaining and evaluating monitoring data in the field; and the proper frequency of monitoring activities during various site activities.