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Stoller

established 1959

May 25, 1994  
2510-94/09



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Ms. Laurie Peterson-Wright  
EG&G Rocky Flats, Inc.  
P.O. Box 464, Bldg. 080  
Golden, Colorado 80402-0464

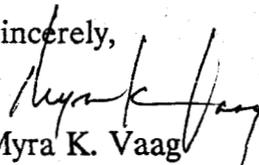
Subject: Submittal of Responses to Comments  
Draft Addendum to the Site-Specific Health and Safety Plan  
Operable Unit No. 7 (MTS Contract 353017TB3)

Dear Ms. Peterson-Wright:

Responses to Comments on the Draft Addendum to the Site-Specific Health and Safety Plan for Operable Unit (OU) No. 7 under MTS Contract 353017TB3 are enclosed as you requested. Stoller will incorporate comments in the final document after the responsiveness summary has been approved. Please note that the responsiveness summary and the final addendum are not deliverables under Revision 2 of the Statement of Work for OU 7, dated May 2, 1994.

If you have any questions, please contact Virgil Palencia, Stoller's Health and Safety Manager, or me at your convenience.

Sincerely,

  
Myra K. Vaag  
Senior Geologist

Enclosure

cc:	W. Bartholomew	EG&G
	P. Martin	EG&G
	T. O'Rourke	EG&G
	A. Crockett	Stoller
	G. Davis	Stoller
	V. Palencia	Stoller
	L. Ross	Stoller
	B. Stephanus	Stoller
	MKV Chron	



ADMIN RECCRD

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**Responses to Comments**  
**Addendum to Site-Specific Health and Safety Plan**  
**Operable Unit No. 7**

**K.D. Anderson, EG&G**

**General Comments**

**Section 4.1**

**Comment:** Why is "animal tissue" listed as a hazard? Is mammal/insect sampling to be conducted?

**Response:** The references to animal tissue and vegetation will be deleted from this section.

**Section 4.3**

**Comment:** Is it true that the detects/PCOC's as listed were found in Phase I-OU 7? If so, review the data and state levels with associated potential exposure.

**Response:** Analytes detected at OU 7 with concentrations above background as determined by a statistical analysis are potential contaminants of concern (PCOCs). Concentration ranges for each analyte will be included on the list of PCOCs.

**Section T-2**

**Comment:** If no respiratory protection is worn, there should be not potential for exposure to be present. What is the EZ is established for physical safety reasons, can't level D be worn? Delete second Modified Level D.

**Response:** This section will be modified to state that the initial level of protection will be level D protection. The EZ for the drilling operations is created for the protection of non-essential personnel and visitors from heavy equipment and moving parts. Modified level D is listed in the table twice; one will be deleted.

**Section T-3**

**Comment:** Do you really intend to tape wrists/ankles to gloves/boots for ticks? At all times?

**Response:** This item will be deleted.

### **Section T-3**

**Comment:** Bicron Frisk-Tech with A-100 is used for unrestricted release for alpha contamination.

**Response:** This section will be modified to replace the Ludlum instrument with the Bicron Frisk-Tech with A-100 probe.

### **Section T-3**

**Comment:** Do overhead hazards relate to overhead utilities (electrical) in this section?

**Response:** The text will be modified to state that overhead hazards consist of overhead utilities.

### **Section T-3**

**Comment:** It was previously stated that boreholes/drilling would not be conducted within an IHSS.

**Response:** The table will be modified to indicate that no drilling will be conducted within an IHSS.

### **Section 8**

**Comment:** Where is the 24-hour OSHA Field Experience listed?

**Response:** This item is addressed in the OU 7 Site-Specific Health and Safety Plan, p.63.

### **Section 9.1/9.2**

**Comment:** Please verify that the phone number listed are correct.

**Response:** For emergencies, these are appropriate phone numbers. For life-threatening injuries, x2911 will be used. For non-life-threatening injuries or releases, x2914 will be used.

### **Section 9.3**

**Comment:** What are the evacuation requirements for the EZ/CRZ?

**Response:** This item is addressed in the OU 7 Site-Specific Health and Safety Plan, p.70.

### **Section 10**

**Comment:** Add reference to FO.06 for handling of PPE.

**Response:** This item is addressed in the OU 7 Site-Specific Health and Safety Plan, p.44.

## **Mandatory Comments**

### **Section 2.1/2.2**

**Comment:** Expand to define the responsibilities and expectation of the primary individuals (as to health and safety), as a minimum the Site Supervisor, HSS, and PM.

**Response:** Responsibilities of primary individuals are covered in Section 2 of the OU 7 Site-Specific Health and Safety Plan. An organization chart and responsibilities of project-specific personnel will be incorporated in the addendum.

### **Section 4.1**

**Comment:** Include potential for bites and scratches as a hazard.

**Response:** The text will be modified to include bites and scratches.

### **Section 4.2.2**

**Comment:** The statement "impermeable PPE" is incorrect. This should read PPE as increasing the potential for heat stress.

**Response:** The text will be modified to state that PPE, in general, increases the potential for heat stress.

### **Section 6.0**

**Comment:** Change "Air" to "Site."

**Response:** The text will be modified from "Air" to "Site."

### **Section 7.3**

**Comment:** Add "Buffer Zone" as per HSP 20.01.

**Response:** The text will be modified to include no smoking in buffer zone per HSP 20.01.

### **Section 9.3**

**Comment:** Add release requirements of HSP 18.10. Add reference to 1-C49-HWRM-04, Rev. 0, Release Response and Reporting to Section 9.3.

**Response:** The text will be revised to include property release requirements per HSP 18.10 and EMRG 3.02. These issues will be addressed in Section 10 of the addendum to OU 7 Site-Specific Health and Safety Plan. This item is mentioned briefly in the OU 7 Site-Specific Health and Safety Plan, p.50.

The procedures for hazardous waste handling according to the Hazardous Waste Requirements Manual, which includes 1-C49-HWRM-04, Rev. 0, Release Response and Reporting, will be referenced in this section.

# L.A. Nelowet, EG&G

## General Comments

### Section 4.2.1

- Comment:** Cold stress seems unlikely on a 4-mo. project extended over the summer. I rec. deleting.
- Response:** Because the OU 7 project will continue into the fall season, the section on cold stress should remain in the document.

### Section F-2

- Comment:** Include pertinent street names.
- Response:** Street names for the emergency route will be included on the map.

## Mandatory Comments

### Section 4.2.2

- Comment:** Please include heat stress monitoring as described in NIOSH/OSHA/USCG/EPA book "Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities". p. 8-21
- Response:** This material is addressed in the OU 7 Site-Specific Health and Safety Plan, Appendix A.

### Section 2.1

- Comment:** Identify responsibilities and lines of authority.
- Response:** See response to mandatory comment from K.D. Anderson (Section 2.1/2.2).

### Section T-1

- Comment:** Concentrations (max. detected) are valuable for evaluating hazard, please include.
- Response:** See response to general comment from K.D. Anderson (Section 4.3).

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## Section T-2

**Comment:** "Modified D" is repeated. Also, specify when Tyvek will be worn vs. poly tyvek.

**Response:** Modified level D is listed in the table twice; one will be deleted. Table 2 in the addendum has been modified to address specific usage for Tyvek and Poly-Coated Tyvek.

## Section T-4

**Comment:** Action levels are too high for many of the COC's; should be linked to 1/2 PEL. Ex. for carbon tetrachloride PEL=2ppm.

Upgrading to level C based on PID readings 5-10 is inappropriate. Many of the COC's listed do not have approved APR cartridges including chloroform and carbon tet! Recommend using colorimetric tubes to identify airborne hazard if > background on PID.

**Response:** The action level shall be reduced to 1 part per million above background readings. When the PID reading is above the action level, then colorimetric tubes will be used to identify the specific airborne concentrations for each chemical, as appropriate.

## Section T-4

**Comment:** How were the dust action levels selected? Should be based on Phase I data on metals and radionuclides.

**Response:** The dust action levels shown on Table 3 are OSHA respirable permissible exposure limits for nuisance dust. Initial air sampling for radionuclides, heavy metals, volatile organic compounds (TO1/TO2 VOCs) were performed during the Phase I RFI/RI at OU 7. The results show the concentrations of the analytes were insignificant. See LAL028-93.

## Section 8

**Comment:** Include site specific briefing including review of HASP. Include 3 days supervised field experience per 29 CFR1910.120 (e). Include requirements for visitors.

**Response:** This material is addressed in the OU 7 Site-Specific Health and Safety Plan, pp. 63-66.

## Section on Site Control

**Comment:** Site control including delineation of zones must be included in HASP. 29CFR1910.120 (d).

**Response:** This is addressed in the OU 7 Site-Specific Health and Safety Plan, pp. 35-36.

**Section 10**

**Comment:** Decon of personnel must be included!

**Response:** This is addressed in the OU 7 Site-Specific Health and Safety Plan, pp. 45-50.

## **P.A. Stephens, EG&G**

### **General Comments**

#### **Section 7**

**Comment:** Personnel work limitations: 15 mph is very low and the wording of this item is very confusing - reevaluate wording and 15 mph requirement.

**Response:** The stop work limitation for drilling and sampling activities is a 15-minute average wind speed of 35 mph.

## **D.S. Hyder, EG&G**

### **General Comments**

#### **Section 5**

**Comment:** Instruments used should be in accordance with EMRG's.

**Response:** This section will be modified to indicate that the Bicron Frisk-Tech with A-100 probe will be used to monitor for alpha surface contamination.

#### **Section 6**

**Comment:** Why is this under air monitoring header?

This is too much...when required by procedure is enough, the rest is redundant.

**Response:** The Section 6 heading will be changed to "Site Monitoring." Radiological monitoring will be performed when required by EG&G standard operating procedures.

#### **Section 7, #3**

**Comment:** Smoking is not permitted in the buffer zone.

**Response:** This section will be modified as requested.

#### **Section 7, #4**

**Comment:** Monitored for what, declared safe by whom? This does not make sense.

**Response:** This section will be modified to explain that the Health and Safety Specialist shall monitor for VOCs.

#### **Section 7, work limits #1**

**Comment:** 15 mph is very conservative and not according to plant policy for drilling, is this for the ponds?

**Response:** See response to comment from P.A. Stephens.

#### **Section 9.1**

**Comment:** What required engineering controls will be in place during field operations.

**Response:** This statement will be deleted from the section.

### **Section 9.3**

**Comment:** What Stoller personnel can administer first aid in the field - this is unclear. Will Stoller have personnel trained to perform first aid?

**Response:** This section will be modified to explain first aid training requirements and procedures.

### **Mandatory Comments**

#### **Section 5**

**Comment:** Thermoluminescent dosimetry in a procedure requirement and should not be controlled by HASP.

**Response:** This item has been deleted from the document.

#### **Section 6**

**Comment:** The limits in the applicable EMRG must be used.

**Response:** This section will be modified to state instrument reading limits in accordance with EMRG requirements.

#### **Section 7, #5**

**Comment:** Include as required by procedure, Industrial Hygiene, Occupational Safety and Radiological Engineering.

**Response:** This section will be modified as requested.

#### **Section 8**

**Comment:** Radiation work II training is procedurally required for dosimetry and should not be controlled by a HASP.

**Response:** This section will be modified to state adherence to EG&G requirements.

#### **Section 10**

**Comment:** This is the wrong procedure and in addition should not be controlled by a HASP.

**Response:** This section will be revised to discuss decontamination policy and reference decontamination procedures in the OU 7 Site-Specific Health and Safety Plan. Unrestricted release of equipment will be addressed in this section per HSP 18.10 and EMRG 3.02.

**R.A. Cummings, EG&G**

No comments

**F.J. Furman, EG&G**

No comments