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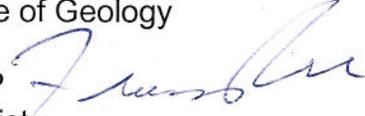
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Edmund G. Brown Jr.
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MEMORANDUM

TO: Laura Rainey, P.G.
Senior Engineering Geologist
Brownfields and Environmental Restoration
Cleanup Program, Office of Geology

FROM: Frank S. Parr, CIH, CSP 
Senior Industrial Hygienist
Health and Safety Program (HSP)

DATE: June 14, 2011

SUBJECT: Santa Susan Field Laboratory, Area IV
Revised Site Investigation Health and Safety Plan (HASP)
PCA Code: 22120 Site Number: 300381-48-37

BACKGROUND

The Brownfields and Environmental Restoration Program (BERP), Office of Geology in Cypress requested the HSP review the revised Camp Dresser and McKee (CDM) Site Specific Health and Safety Plan (HASP) for oversight activities associated with the installation of direct push soil borings and the collection of soil samples at the Santa Susan Field Laboratory, Area IV Site (herein referred to as the Site).

The original review request focused on whether the CDM HASP contained the basic HASP elements as specified on Page 11, Section 2.5.4.3. of the Administrative Order of Consent (AOC).

The SSFL comprises approximately 2,700 acres of mountainous terrain ranging from 1,700 to 2,200 feet above sea level. The SSFL is surrounded by Simi Valley to the north, the San Fernando Valley to the east, and Thousand Oaks to the southwest. SSFL is divided into four operational areas (areas I, II, III and IV). A wide variety of research and development activities have historically been conducted at the SSFL.

The proposed scope of work as described in the HASP is as follows: "This project involves observing HydroGeoLogic, Inc. and their subcontractors perform direct push boring and collection of soil samples, as well as conventional collection of surface soil

samples using stainless steel trowels. CDM personnel will collect surface soil samples using a slide hammer and stainless steel or brass sleeves”.

DOCUMENT REVIEWED

The HSP reviewed the revised “Health and Safety Plan Form, CDM Health and Safety Program, Santa Susana Field Laboratory, Area IV, Ventura County, California”. The document was prepared by CDM. The revised document was received by the HSP reviewer on June 13, 2011.

REVIEW CRITERIA

As described above in the Background Section, page 11 of the AOC includes the statement found below (consistent with the criteria found within 8 CCR 5192) regarding the minimum content of Site Specific Health and Safety Plans used on Site.

“A Site-specific Health and Safety Plan shall be prepared in accordance with federal regulations (29 CFR 1910.120) and state regulations (Title 8 CCR Section 5192). This plan should include, at a minimum, the following elements:

- (1) Site Background/History/Workplan;
- (2) Key Personnel and Responsibilities
- (3) Job Hazard Analysis/Summary;
- (4) Employee Training;
- (5) Personal Protection;
- (6) Medical Surveillance;
- (7) Air Surveillance;
- (8) Site Control;
- (9) Decontamination;
- (10) Contingency Planning;
- (11) Confined Space Operations;
- (12) Spill Containment;
- (13) Sanitation;
- (14) Illumination; and
- (15) Other applicable requirements based on the work to be performed.”

CONCLUSIONS AND RECOMMENDATIONS

With the exception of comment #15, the revised CDM HASP adequately addresses the previously outstanding comments contained in the May 31, 2011 HSP HASP review memorandum.

Based upon increasingly hot environmental conditions, the level of protection and the proposed scope of work, the potential for employee exposure to heat-related illness is a concern.

Comment # 15, indicated "The CDM HASP does not include a discussion of heat-related illness monitoring and prevention protocols per the requirements of 8 CCR 3395".

The HSP requests that CDM revise the discussion of heat stress to incorporate or reference the basic requirements of 8 CCR 3395. This includes, but is not limited to the following; 1) Access to water (8 CCR 3395(c), 2) Access to shade (8 CCR 3395(d), 3) Procedures for high heat conditions (8 CCR 3395(e), and 4) Procedures for employee and supervisor training.

With the inclusion of the information requested above, the revised HASP will adequately address all previously outstanding comments contained in the original May 31, 2011 HSP HASP review memorandum.

Future changes in the document should be clearly identified.

The HSP is available to discuss this document and related issues. Should questions arise contact Frank Parr at (818) 717-6592.

PEER REVIEW BY:


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