



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 104



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C.G. 541. 460. D
DDMT-DE
APR 13 1995

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
MEMPHIS ENVIRONMENTAL FIELD OFFICE
SUITE E-645, PERIMETER PARK
2510 MT. MORIAH
MEMPHIS, TENNESSEE 38115

April 12, 1995

Commander
Defense Distribution Depot Memphis
Attn.: DDMT-WP (Mr. Frank Novitzki)
2163 Airways Blvd.,
Memphis, Tennessee 38114-5210

Re: Generic Health and Safety Plan for DDMT, Draft Final, February 1995,
TDEC/DSF #79-736, cc 82

Dear Mr. Novitzki:

The Division of Superfund (DSF) Memphis Field Office (MFO) has reviewed the Generic Health and Safety Plan for DDMT, received in this office on 2/27/95.

Pursuant to the intent of the Federal Facilities Agreement (FFA), the Tennessee Department of Environment and Conservation (TDEC) is providing the attached comments. Should you have any questions or concerns regarding this review please call me at (901) 368-7958.

Very truly yours,

A handwritten signature in cursive script, reading "James W. Morrison".

James W. Morrison, P.G.
Environmental Project Manager
TDEC/DSF-MFO

c: TDEC/DSF, NCO, Clint Willer, file
TDEC/DSF, MFO, file
Martha Berry
United States Environmental Protection Agency
Federal Facilities Branch
345 Courtland Street, N.E.
Atlanta, GA 30365

**COMMENTS FOR DDMT ON
GENERIC HEALTH AND SAFETY PLAN
DRAFT FINAL FEBRUARY 1995**

Specific Comments:

1. Section 1.1, Purpose, Second para. page 1-1.
Misspelled word "Comapny" should be "Company".
2. Section 2.1, Project Manager, page 2-1.
Please specify which PM has the overall responsibility for performance of project in a safe manner.
3. Section 4.2, Training Documentation, page 4-1.
Please expand on what is considered "the requisite training" required for this job. There is no mention of three (3) day OJT documentation for site workers.
4. Section 5.1.2 Level C, fifth bullet, page 5-2.
Please include parenthetically "intrinsically safe in hazardous atmospheres". This phrase should be included where appropriate under all subsequent sections.
5. Section 7.1.1, Direct Read Air Monitoring, page 7-1.
A generic HASP should offer guidance as to the frequency, where, when, and who. Please expand.
6. Section 7.2.2, Cold Injury, 7-3.
There is no mention of signs or symptoms of cold injury. Since this is a generic HASP, all potentially necessary information should be included for guidance purposes. Additionally, there are no references to any potential biological hazards (i.e. poison ivy/oak, snakes, etc.).
7. Section 8.1, General Work Zone, page 8-1.
A generalized map of a hypothetical site should be included here indicating all work zones and wind direction.
8. Appendix A, page A-1.
See general comment.
9. Appendix B, page B-1.
See general comment.

**COMMENTS FOR DDMT ON
GENERIC HEALTH AND SAFETY PLAN
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General Comments:

TDEC is confused as to the format used in this document (or these documents). A Generic HASP should act as a primary guidance document for all anticipated Site Specific HASP issues. (i.e. A Generic HASP should incorporate and address all potential health and safety concerns encountered during multi-phased investigations that would impact site workers, casual observers and surrounding resident populations.)

This document appears to be presented in three (3) sections that refer back and forth to one another with no clear hierarchy of authority.

- The first section (Health and Safety Plan) appears to be a broad overview as to what is to be contained within the HASP. However, in some sections it goes into specific detail (e.g. decontamination procedure).
- The second section (Appendix D) is much more detailed while being broad in scope. Although this section is titled CH2M HILL Site Safety and Health Plan, it truly approaches what should be considered a Generic HASP, however, it still lacks completeness due to cross referencing.
- The third section (Attachment 1 - El Dorado's Contingency Plan for Non - Chemical Warfare Materiel Sites) wholly lacks completeness and is premature as to its OU referencing. Although this is titled as a Contingency Plan, it looks more like a hastily thrown together HASP. Furthermore, the only contingency noted in this plan was to blow a hand held air horn and instruct every one to run upwind. While this will hopefully protect the workers, there is nothing discussed regarding warning or notification of potentially impacted local residents. Additionally, there is no indication in any of these three sections, that local fire departments, emergency response personnel, and hospitals are equipped to handle hazardous chemical exposures let alone CWA exposures.

If the OSHA rules are truly adhered to, workers should be allowed to read and understand the HASP fully for their safety and protection. A statement (Appendix A) signed by a worker that indicated he or she read and understood it when in actuality they did not, is not legally binding. Furthermore, it is not in keeping with the spirit or the intent of the law (OSHA). Please remember DDMT has the potential for exposure of workers to UXO and CWA. TDEC strongly suggests reorganizing and simplifying this document for clarity and brevity while being as complete as possible. Get rid of the redundancy.

**COMMENTS FOR DDMT ON
GENERIC HEALTH AND SAFETY PLAN
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10. Appendix D, Section 2.3, Description of Sub Contractors, page D-14.
See general comment regarding hierarchy of authority. Please elaborate who the HSM will be and what is their authority?
11. Appendix D, Table 3, page D-15.
Please update the following.
Jim Morrison, P.G. TDEC/BRAC Project Manager delete "(?)"
Jordan English, P.G. Environmental Field Office Manager
Delete "Lauranda Redmond and phone number"
12. Appendix D, 4.1, CH2M HILL Employees, page D-36.
Please clarify, will there be any SSO's present?
13. Appendix D, Section 6.0, Air Monitoring Equipment.
Please clarify (add column) the location of monitoring equipment with regard to contaminants specific gravity.
14. Appendix D, Section 8.0, page D-41.
Please add a section or bullet that briefly describes how IDW will be managed.
15. Appendix D, Section 12.0, page D-47.
See general comment with regard to the verification of hospitals to handle chemical and CWA contaminated workers.
16. Attachment 1, El Dorado's Contingency Plan for Non - Chemical Warfare Materiel Sites.
This section is wholly deficient. See general comment.

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