

INSTRUCTIONS FOR THE DRMS THIRD PARTY SITE PROGRAM

A. REFERENCES.

1. DRMS-M 6000.1, Hazardous Waste Operations Manual for DRMS Third Party Program, January 1994 (hereby cancelled).
2. DoD 4160.21-M, Defense Reutilization and Marketing Manual.
3. DRMS-I 5100.1, DRMS Organization, Mission and Functions.
4. See listing in DRMS-I 6050.1, Chapter I, paragraph B1.

B. PURPOSE. Supersedes reference A1. This instruction contains internal procedures for Defense Reutilization and Marketing Service (DRMS) employees involved in response actions at hazardous waste sites located off military installations.

C. APPLICABILITY AND SCOPE. This instruction applies to the Defense Reutilization and Marketing Service (DRMS) activities world-wide.

D. DEFINITIONS. Unique terms and definitions applicable to the regulatory requirements are discussed in specific chapters of the instruction.

E. PROCEDURES. Specific procedures for hazardous waste operation for DRMS Third Party sites are outlined in Chapters I thru IV.

F. RESPONSIBILITIES. The Environmental Protection Division (DRMS-SH), shall be responsible for exercising primary staff responsibility for managing and administering the DRMS Third Party Site Program by performing the mission and functions assigned in reference A3, Part III, Chapter 1, Section 1220.

G. EFFECTIVE DATE AND IMPLEMENTATION. This instruction is effective and shall be implemented upon distribution.

H. INFORMATION REQUIREMENTS. Requests for revisions, changes, exceptions or waivers to this instruction may be submitted in writing to the Commander, Defense Reutilization and Marketing Service, ATTN: DRMS-SHO, 74 W. Washington Ave., Battle Creek, MI 49017-3092.

BY ORDER OF THE COMMANDER

/s/
DOUGLAS W. YOUNG
LCDR, SC, USNR
Executive Officer

TABLE OF CONTENTS

	PAGE
TABLE OF CONTENTSiii
LIST OF ACRONYMSv
CHAPTER I - GENERAL PROVISIONS	
A. DRMS Third Party Mission StatementI-1
B. Function StatementI-1
C. Policy Directives.I-2
D. Authorization.I-2
E. Decision Making CriteriaI-3
F. Funding.I-6
G. Recordkeeping RequirementsI-6
H. Administrative Record.I-6
I. ReferencesI-7
ENCLOSURES:	
1. DLA Staff Summary Sheet.I-E1-1
2. Administrative Record.I-E2-1
CHAPTER II - MEDICAL, PPE, AND TRAINING PROGRAM	
A. Medical Surveillance ProgramII-1
B. Personal Protection Equipment Program.II-5
C. Training ProgramII-8
ENCLOSURES:	
1. DRMS-FH Medical Surveillance Procedures.II-E1-1
2. Report of Medical History.II-E2-1
3. Notice of Traumatic Injury and ClaimII-E3-1
4. Request for Examination and/or TreatmentII-E4-1
5. Notice of Occupational Disease and ClaimII-E5-1
6. Types of Air-Purifying RespiratorsII-E6-1
CHAPTER III - ON SITE OPERATIONS	
A. INTRODUCTIONIII-1
B. BACKGROUNDIII-1
C. PROCEDURESIII-2
ENCLOSURES:	
1. Typical Removal Operation Management StructureIII-E1-1
2. Authorization to Sign ManifestIII-E2-1
3. SOP Site Investigations and Removal Actions.III-E3-1

ATTACHMENTS:

- 1. Sample Military Interdepartmental Purchase RequestIII-A1-1
- 2. Alphabetized State Listing of Hazardous Waste Contact. . .III-A2-1
- 3. EPA Notification of Regulated Waste ActivityIII-A3-1

CHAPTER IV - SITE SAFETY PLAN AND RESPIRATOR PROGRAM

- A. Site Safety and Health Requirements.IV-1
- B. Respirator Protection Program RequirementsIV-4

ENCLOSURES:

- 1. Health and Safety Checklist.IV-E1-1
- 2. On-site Work ZonesIV-E2-1
- 3. General Site Safety and Health Plan.IV-E3-1
- 4. DRMS Respirator Protection Plan.IV-E4-1

ATTACHMENTS:

- 1. Respirator Use and Maintenance Record.IV-E4-A1-1
- 2. Inspection/Maintenance TagIV-E4-A2-3
- 3. Respirator FittingIV-E4-A3-1

APPENDICES:

- 1. Definitions.A-1
- 2. EPA Directory and Map.B-1

LIST OF ACRONYMS

AEHA	-U.S. Army Environmental Hygiene Agency
AMCCOM	-U.S. Army Armament, Munitions, and Chemical Command
AO	-Administrative Order By Consent
AOC	- Area of Contamination
ARAR	-Applicable or Relevant and Appropriate Requirements
ATSDR	-Agency for Toxic Substances and Disease Registry
BDAT	-Best Demonstrated Available Technology
CAA	-Clean Air Act of 1970
CD	-Consent Decree
CERCLA	-Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CFR	-Code of Federal Regulations
CLP	-Contract Laboratory Program
CPF	-Cancer Potency Factor
CRP	-Community Relations Plan
CWA	-Clean Water Act
DERA	-Defense Environmental Restoration Account
DLA	-Defense Logistics Agency
DOD	-Department of Defense
DQO	-Data Quality Objectives
EPA	-U.S. Environmental Protection Agency
FIT	-Field Investigation Team
FSP	-Field Sampling Plan
HCS	-Hazard Communication Standard
HRS	-Hazardous Ranking System
IAG	-Interagency Agreement

LDR -Land Disposal Restrictions

MSDS -Material Safety Data Sheet

NAAQS -National Ambient Air Quality Standards

NCP -National Oil and Hazardous Substances Contingency Plan

NEPA -National Environmental Policy Act

NIOSH -National Institute for Occupational Safety and Health

NPL -National Priorities List

O & M -Operation and Maintenance

OSC -On-Scene Coordinator

OSHA -Occupational Safety and Health Administration

OSWER -Office of Solid Waste and Emergency Response

PA -Preliminary Assessment

PCB -Polychlorinated Biphenyl

PEL -Permissible Exposure Limit

POTW -Publicly Owned Treatment Works

PPM/PPB -Parts per million/parts per billion

PRP -Potentially Responsible Party

QA/QC -Quality Assurance/Quality Control

QAPP -Quality Assurance Project Plan

RCRA -Resource Conservation and Recovery Act of 1976

RD/RA -Remedial Design/Remedial Action

RI/FS -Remedial Investigation/Feasibility Study

ROD -Record of Decision

RPM -Remedial Project Manager

SAP -Sampling and Analysis Plan

SARA -Superfund Amendments and Reauthorization Act of 1986

SWDA -Solid Waste Disposal Act

TAT -Technical Assistance Team

TCL -Target Compound List

TCLP	-Toxicity Characteristic Leaching Procedure
TPPM	-Third Party Project Manager
TSCA	-Toxic Substances Control Act of 1976
TSDF	-Treatment, Storage or Disposal Facility
USACE	-U.S. Army Corps of Engineers
VOC	-Volatile Organic Compound

CHAPTER I

DRMS-I 6000.1

CHAPTER I - GENERAL PROVISIONS

A. DRMS OFF-INSTALLATION THIRD PARTY PROGRAM MISSION

1. Responsible for providing technical support and policy guidance for compliance with applicable environmental regulations for the Defense Reutilization and Marketing Service (DRMS) Third Party program.
2. Acts as a program manager and principal advisor to the Defense Logistics Agency (DLA) for the development of DRMS procedures and record of decisions (ROD) for DRMS participation at third party sites.
3. Acts as a principal coordinator for on site investigations, response actions, and the development procedures involving DRMS field activities.

B. THIRD PARTY FUNCTIONS

1. Coordinates and provides administrative oversight for the DRMS Third Party Program.
2. Executes DLA response actions at third party sites where a Federal, state, local or other government agency has named an activity within the DRMS organization as a Potentially Responsible Party (PRP) for a site clean up.
3. Ensures the retrieval and proper disposal of Government owned or formerly Government owned property from a third party site.
4. Participates in the investigations of third party sites and negotiation for settlement of third party claims. Contracts for removal actions, Remedial Investigation and Feasibility Studies (RI/FS) and remedial actions through DRMS Directorate of Contracting, Interservice Support Agreements with the U.S. Army Corps of Engineers (USACE) Huntsville Division, other DoD components and Federal agencies.
5. Submits annual budget requests for DRMS Third Party program and funding claims to HQ DLA as needed.
6. Provides DLA, the DRMS Commander, and the DRMS Deputy Commanders quarterly updates on active third party sites in which DRMS is the lead agency.

C. POLICY DIRECTIVES.

1. DRMS personnel will comply with environmental regulations of Federal, state and local governments in the performance of the third party mission.
2. Ensure only properly trained personnel are engaged in any phase of on-site hazardous waste operations.
3. Maintain a comprehensive safety program to protect the health and safety of DRMS personnel in compliance with OSHA regulations.

4. Ensure the accuracy and timeliness of all policies, procedures and guidelines to DRMS field activities.

5. Provide thorough, timely responses to the U.S. Environmental Protection Agency (EPA), state, local or other government agency request for information.

6. DRMS shall not automatically assume liability for the removal or clean up of hazardous property found with DoD markings, nor stand in the way of legal or criminal prosecution of those responsible.

7. Response actions shall be carried out in compliance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended by Superfund Amendments and Reauthorization Act (SARA) of 1986, and sites covered by the Resource Conservation and Recovery Act of 1976 (RCRA) as amended by 42 USC 6901, and voluntary clean up operations at sites recognized by Federal, state, local or other governmental bodies as uncontrolled hazardous waste sites.

D. AUTHORIZATION.

1. In May 1980, DLA was designated by Defense Environmental Quality Program Policy Memorandum (DEQPPM) 80-5 as the agency within the Department of Defense (DOD) responsible for disposal of DOD generated hazardous property. Excluded were eight categories of property specifically designated for DOD component disposal. This policy centralized disposal contract responsibilities within DLA/DRMS.

2. Department of Defense (DOD). The disposal requirements for DOD components are stated in DOD 4160.21-M, Chapter IX.

3. Defense Logistics Agency (DLA) and Defense Reutilization and Marketing Service (DRMS). The disposal requirements for DLA/DRMS are stated in DOD 4160.21-M, Chapter IX. The DLA disposal requirements have been delegated to DRMS.

4. HQ Defense Reutilization and Marketing Service (DRMS). The functions and responsibilities for the DRMS environmental program are stated in DRMS-I 5100.1, Organization, Mission and Functions.

5. In Jan 87, DRMS was formally tasked by DLA with the responsibility for executing response actions at third party sites where a Federal, state or local government agency named an activity within the DRMS organization as a potentially responsible party (PRP).

6. In Oct 89, DRMS was given authorization by DLA to use Defense Environmental Restoration Account (DERA) funds to conduct response actions or to contribute to multi-party cleanup agreements at third party sites.

E. DECISION MAKING CRITERIA.

1. The following procedures supplement guidance forwarded by DLA to this Command, in July 90, pertaining to DRMS response actions at third party sites. Specific criteria for approving or denying request for third party assistance are provided below.

2. The DRMS Third Party Project Manager (TPPM) will contact the appropriate DRMS directorates and field activities in responding to request for assistance on a site-by-site basis. A recommendation will be forwarded by DRMS-SH or DRMS-G to the DRMS commander based on the criteria outlined below. The recommendation shall be formally submitted to the DRMS Commander on DLA Form 101 (see enclosure 1). The

DLA Staff Summary Sheet shall be prepared by DRMS-SH or DRMS-G, whichever office has the lead action. Justification and background documentation shall be provided to support the recommendation.

a. A response action is identified as any of the following actions:

- (1) Site investigation
- (2) Retrieval action
- (3) Removal action
- (4) Site remediation

b. DRMS shall agree to participate in a response action when the following conditions apply:

(1) Records show site resulted from past DRMS ultimate disposal service contract.

(2) Records show site resulted from past DRMS precious metals recovery contract.

(3) Records indicate site resulted from past DRMS Transfer/Donation/Sales (T/D/S) and any of the following applies:

(a) DRMS sold, transferred, or donated a hazardous substance which improperly or inadvertently included a regulated hazardous substance.

(b) DLA sold, transferred, or donated a pesticide or other hazardous material which is subsequently banned or restricted by EPA regulation (not included are hazardous wastes properly landfilled which later become subject to 40 CFR 268, Land Ban Restrictions).

(c) The price received, the controls DRMS had in place or the condition of the property indicate it was not used for intended purpose or beneficial use.

(4) DRMS records do not dispute regulator documentation, e.g., sales contract records, disposal contract records and one of the above applies.

(5) Safety, health and environmental reasons require immediate action and response considered to be in the best interest of DOD. This decision shall be made by the DRMS Commander after coordination by DRMS-SH, DRMS-G, and other offices involved.

(6) When ordered by DOD, DLA or EPA.

NOTE: Each phase of a response action shall be subject to the above criteria. The decision to participate in one phase of a response action does not dictate action on a following phase.

c. A determination of DRMS responsibility will be made on a case-by-case basis. DRMS may decline participation in a response action if one or more of the following conditions exists:

(1) One of the CERCLA exemptions applies, i.e., act of God, act of War.

(2) Proper T/D/S was accomplished, i.e., proper HM/HW designation, controls were in place, property was in good condition, appropriate permits were in place and property was used for intended or beneficial use.

(3) Only link to DOD are manufacturer's markings on the containers.

(4) EPA/state claim is undocumented and cannot be substantiated.

d. DRMS shall take the lead role in carrying out a response action given the following conditions:

(1) When 75 percent (advisory, not mandatory) or more of the property can be traced to DRMS using criteria in paragraph E.2.b.

(2) When directed by the Office of the Assistant Secretary of Defense (OASD) to act on behalf of the Military Services.

(3) When EPA has determined imminent and substantial endangerment exists and no other PRP has agreed to undertake the response action. This decision will be made by DLA/DRMS.

e. DRMS is authorized to participate in a voluntary response action with a PRP group as follows:

- (1) Funds are available and DOD interests are properly protected.
- (2) Financial considerations indicate that it is the preferred option.
- (3) Less than 75 percent (suggested) of the property can be traced to DRMS.
- (4) When DRMS can settle as a "de minimus" (around one percent) or "de micromus" (fraction of a percent) contributor and when the interests of DOD are properly protected.

f. Accomplishment of Work:

- (1) Work shall be contracted through the DRMS contracting office, if the response action is within the normal scope of the DRMS Contracting Directorate.
- (2) DRMS shall obtain engineering, contracting services, and other technical support through the USACE and other DOD components.
- (3) Consultant services may be used to conduct record searches, establish administrative records, evaluate cost recovery actions, and conduct other CERCLA related activities.

F. FUNDING

1. Funding shall be obtained through DLA-CAAE, Environmental and Safety Policy Office, from the Defense Environmental Restoration Account Fund (DERA). Specific guidelines for eligible and ineligible DERA projects are provided in DRMS-I 6050.1, Chapter XVI, enclosure 1.

2. Funds shall be requested through the Program Manager, Environmental Processes (DRMS-SH). DRMS field activities are not authorized to submit requests for DERA funding directly to DLA-CAAE.

3. The DRMS Commander shall make all decisions to spend DRMS Operation and Maintenance (O & M) funds for simple retrieval actions involving third party sites. This authority has not been delegated to any lower office within the Command. Request to spend O & M funds for third party response actions shall be coordinated through the Chief, Environmental Division (DRMS-SH).

4. The principle office of contact, within DRMS, for funding request or questions is DRMS-SHO, at (616) 961-5931 or (DSN)932-5931.

G. RECORDKEEPING REQUIREMENTS. Records shall be retained pursuant to CERCLA section 103 or as otherwise stated in the site specific Administrative Order by Consent (AO), Side-bar Agreement or other formal agreement. Section 103(d)(2) of CERCLA states that beginning 11 Dec 80, records shall be retained for fifty years thereafter or for fifty years after the date of establishment of a record (whichever is later).

H. ADMINISTRATIVE RECORD

1. The DRMS TPPM shall establish and maintain an administrative record for CERCLA and non-CERCLA sites in which DRMS is involved. This record shall contain a copy of documents which form the basis for selection of a response action at the site i.e., retrieval, removal or remediation, and documents of on-going site activities.

2. EPA may furnish documents that DRMS shall place in the administrative record to ensure that the record includes all documents forming the basis for the selected action.

3. DRMS will also establish an administrative record at a central location near the CERCLA site, when DRMS is the lead agency. Copies of documents in the record shall be available for public inspection, i.e., DRMO administrative office, public library, elementary school. Documents placed in the record shall be coordinated with the DRMS Office of Counsel (DRMS-G), DRMS Office of Public Affairs, (DRMS-XB) and other regulatory agencies as needed.

4. A sample Administrative Record, Table of Contents, is provided at enclosure 2. The appropriate EPA Regional Office or other government agency shall be forwarded a copy of the Table of Contents for the DRMS Administrative Record. Documents typically filed in the administrative record are provided in 40 CFR Part 300.810, the site AO by Consent or other formal agreement. These records may include: site informational data, sampling data, inspection reports, progress reports, access agreements, work plans, and final reports.

I. REFERENCES: The following references were used in preparing this instruction. They are available for review in the Environmental Processes, DRMS-SHP, Battle Creek, Michigan.

1. DLAM 6055.1, DLA Safety and Health Manual.
2. DRMS-I 6050.1, Environmental Compliance For The DRMS Disposal Process.
3. DRMS-H 6055.2, Personal Protective Equipment Handbook.
4. 29 CFR Part 1960.59 Training of Employees and Employee Representatives.
5. NIOSH/OSHA/USCG/EPA, Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities.
6. EPA Standard Operation Safety Guides.
7. 40 CFR part 260-399.
8. 49 CFR Part 100-177.
9. 29 CFR Part 1910.120 Hazardous Waste Operations and Emergency Response.
10. 29 CFR Part 1910.132.
11. 29 CFR Part 1910.134 Respiratory Protection.
12. 40 CFR Part 761, PCB Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions.

ENCLOSURE 1

CHAPTER I

DRMS-I 6000.1

DLA STAFF SUMMARY SHEET

ROUTE TO	ACTION	SIGNATURE	DATE
DRMS-G	Concur	_____	09-13-92
DRMS-DC	Review	_____	ORIGINATOR
DRMS-DD	Review	_____	DRMS-SHO
DRMS-D	Approve	_____	ACTION OFFICER
DRMS-S	Dispatch	_____	T. S. DMOCH
			SUSPENSE DATE

SUBJECT: Nitrogen Tetroxide 3rd Party Site, Montrose, CO (Site #183)

SUMMARY:

1. PURPOSE. To decide if DRMS should conduct a removal of hazardous property at the subject site as requested by U.S. EPA, Region VIII (see TAB A).

2. FACTS:

a. A Congressional inquiry through DLA-MMSLP and EPA Region VIII has requested that DRMS arrange for the pick up and disposal of a cylinder of Nitrogen Tetroxide which is a highly toxic chemical used as a component of rocket fuel.

b. A review of IDMS shows Port Hueneme sold 15 cylinders of Nitrogen Tetroxide in 1980.

c. EPA advised DRMS that because this material is highly toxic, it should be handled only by specially qualified personnel.

3. DISCUSSION:

a. Tom Dmoch, DRMS-SHO, spoke with the Directorate of Aerospace Fuels, Kelly AFB regarding this material. The personnel at Kelly are able, willing and qualified to handle this material and will make a removal and disposal at a cost of \$9,000. Personnel from Kelly AFB will be in the Montrose, CO area on 29 September 1993. If a pick is not made on 29 September 1993, a special pick up must be arranged which will result in significantly higher costs to DRMS. (see TAB B).

b. In order to fund this removal, \$9,000 is available for transfer to the Nitrogen Tetroxide Site from DERA funds which have been identified with the Yellow Water Site (Site #3).

4. RECOMMENDATION: Because DoD has liability at this site under CERCLA, Commander should approve, by 20 September 1993, the proposed removal and disposal action of DoD identified property.

/s/

J. W. EGGENBERGER
Director, Directorate of
Disposal Management and
Environmental Protection

S A M P L E

ENCLOSURE 2

CHAPTER I

DRMS-I 6000.1

ADMINISTRATIVE RECORD
SUMMIT EQUIPMENT AND SUPPLIES SITE

INDEX/TABLE OF CONTENTS

- 1.0 REMOVAL WORK PLANS
 - 1.1 Phase I - Site Stabilization Plans
 - 1.2 Phase II - Disposal of Segregated Waste Plans
 - 1.3 Monthly Progress Report
- 2.0 ENFORCEMENT
 - 2.1 Administrative Consent Order
 - 2.2 Hamlin Steel Agreement
 - 2.3 Hirsch Agreement
- 3.0 REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS)
 - 3.1 RI/FS Scoping Plan
 - 3.2 RI/FS Work Plans
- 4.0 COMMUNITY RELATIONS
 - 4.1 Community Relations Plan (Reserved)
 - 4.2 Notice of Public Meeting
 - 4.3 DRMS News Release
 - 4.4 Fact Sheet
- 5.0 SAMPLING/REPORT DATA (Reserved)

S A M P L E

CHAPTER II

DRMS-I 6000.1

CHAPTER II - MEDICAL, PPE AND TRAINING PROGRAM

A. MEDICAL SURVEILLANCE

1. A medical surveillance program shall be provided for any DRMS employee working at a third party site who may be exposed to hazardous substances or health hazards at or above the permissible exposure limits. These employees shall undergo baseline testing including: past medical history, a physical examination, laboratory blood test, and a pulmonary function test tailored to their job requirements. The objective of the medical surveillance program is to protect the health of the employee and to prevent disease by detecting trends towards abnormality (pre-disease) or detrimental chemical exposures, at a level or stage where they are reversible. This ultimately minimizes time lost from illness as well as employer liability.

2. The TPPM shall be given their first medical examination within 30 days of placement in a new position where the potential for exposure to hazardous substances may occur. A request shall be submitted to the Office of the DRMS Safety Manager, DRMS-FH. Employee should not be exposed to hazardous substances during this period. The DRMS Safety Manager shall be responsible for processing requests for medical examinations in a timely manner. Specific procedures for medical surveillance of the TPPM have been developed by the DRMS Safety Manager's Office. The TPPM shall fall under Group B as explained in the medical surveillance procedure at enclosure 1.

NOTE: Definition - Medical surveillance is defined as medically examining individuals over time to determine the effects of exposure. That is, the impact of exposure on organ systems and body functions.

3. The hazardous waste site environment presents several problems that are unique to selecting and carrying out medical surveillance testing. Large quantities of various hazardous substances are, by definition, likely to be present at the work site. Volatile organics, heavy metals, acids, halogenated hydrocarbons, aromatics, PCBs, pesticides and many other chemical compounds may all be present at a single hazardous waste site. In addition, combustion or reaction products may be present, as well as unknown contaminants contained in the original material.

4. Because the TPPM may work a number of sites around the United States concurrently, there exists the potential for exposure to hundreds of toxic chemicals in the course of a work year. However, no actual exposure is expected, unless an accident occurs or improper procedures are used.

5. The DRMS Medical Surveillance Program shall include the following components:

(a) Pre-placement Examination. DRMS employees shall be given a pre-placement examination prior to any potential or actual exposure to hazardous waste

on the work site. The purpose of this examination is to determine the state of health of the individual at a certain point in time, before contact with hazardous substances. This provides a baseline for comparison over time and is critical to the medical surveillance program for the following reasons:

(1) The pre-placement examination is given to detect pre-existing disease or disability and document its existence. Employees may have elevated lead levels as a result of having done extensive work on their previous job without adequate protection from lead. If the employee is not tested before they start work, later it is difficult to medically distinguish where and when the absorption occurred.

(2) The pre-placement examination provides evidence that the employee has the physical capacity to perform their jobs safely, carry out on site work assignments and wear protective equipment as required at the hazardous waste site. For example, OSHA regulations require a physician's approval before an employee can be allowed to wear a respirator (29 CFR 1910.120(f)(6) and 29 CFR 1910.134(b)(10)).

(3) Other important historical factors may be identified during the pre-placement examination. A history of asthma, allergies or severe hypersensitivity may make an employee more prone to a variety of reactions from exposure to metals, i.e. nickel, platinum, and chromium. Inhalation of dusts, smoke, or fumes can also cause significant respiratory difficulty in these individuals. A history of epilepsy, seizure disorders, fainting spells, and heat exhaustion is important in determining whether working at heights, operating moving equipment, or driving a motor vehicle may be carried out safely. Other pre-existing conditions such as poor hearing, poor eyesight or the inability to distinguish colors, particularly red and green, are of great importance where warning sounds or difference colored lights or labels are used to convey information.

(b) Periodic Medical Examinations. Examinations shall be provided biennially to DRMS TPPM who work at hazardous waste sites. This examination may be less comprehensive than the baseline examination, but should be conducted in a standardized manner. If periodic examinations show no adverse trends for these individuals over time, this indicates that safety and health measures are probably appropriate. However, any negative trends of abnormal or increasing concentrations of foreign substances in the body, even though within the acceptable reference range, signal the need for better health and safety procedures.

(c) The medical examination shall consist of the following:

(1) History: current symptoms, past medical illnesses and injuries, current illnesses, allergies, and family history of illnesses (see enclosure 2).

(2) Physical examination: hearing, eye site, EKG, skin test, pulmonary function test, x-ray.

(3) Laboratory test: assessment of body burden, functional capacity test, blood and urine measurements.

(d) At termination of employment or reassignment to an area where the employee will not be working in the DRMS third party program, an exit examination will be required.

6. The following procedures shall be used to file treatment and reimbursement claims (forms available in DRMS-KX):

(a) If a TPPM, while on site, is injured, exposed to hazardous substances, or develops symptoms such as dizziness, nausea, etc., the employee should seek immediate medical attention at a local hospital. The employee shall be reimbursed for any medical costs as a result of obtaining medical treatment while on temporary duty.

(b) For reimbursement, employees must file a claims form, U.S. Department of Labor Form CA-1, "Federal Employee's Notice of Traumatic Injury and Claims for Continuation of Pay/Compensation," with DRMS-OHX, Office of Resource Management, within 30 days following the injury. This form shall be used for acute exposures or physical injury to the employee (see enclosure 3). For an employee requiring hospitalization for several days, U.S. Department of Labor Form CA-16, "Request for Examination And/Or Treatment," may be completed by the employee's supervisor (see enclosure 4). This form authorizes the hospital/clinic providing treatment to bill DRMS directly for the services provided.

(c) If while at the office, the TPPM develops symptoms that may be related to work at an uncontrolled hazardous waste site, the employee should seek medical attention from the DRMS Health Clinic or local hospital. Emergency medical treatment may be obtained without prior authorization. The employee shall inform his supervisor of any treatment received. For occupational illnesses, the employee shall file U.S. Department of Labor Form CA-2, "Notice of Occupational Disease and Claim for Compensation", with DRMS-OHX (see enclosure 5).

(d) All claims filed shall include narrative explaining the nature of the injury, the work being performed when the injury was sustained, a witness statement, a situation report, and medical report from the facility providing treatment. See enclosure 6 for a summary of procedures and requirements provided in forms CA-10 and CA-35A.

7. All medical records resulting from the TPPM employment with DRMS shall be maintained in the DRMS's Health Clinic under the employee's name. The employee's supervisor, the employee, and the employee's designated representative shall have direct access to these records. The designated representative shall be identified in writing by the employee. Records shall be retained for 30 years after the employee retires in compliance with the requirements of 29 CFR 1910.120. These records shall include:

(a) The name and social security number of the employee;

(b) Medical records;

(c) Physician's written opinions, recommended limitations and results of examinations and tests;

(d) Any employee medical complaints related to exposure to hazardous substances;

(e) A copy of information provided to the examining physician by the employer;

(f) A statement that the employee has been informed by the physician of the results of the medical examination and any medical conditions which require further examination or treatment.

8. Medical Examination Protocols include:

(a) The examining physician shall be board-certified in occupational medicine or be a medical doctor with extensive experience managing health services. Normally, these examinations will occur at the DRMS Health Clinic or designated facility in Operations East/West offices.

(b) The pre-employment examination shall follow, at a minimum, the protocols found in the Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities, Chapter 5, Medical Programs, pages 5-7.

(c) Medical examinations shall be upgraded when required by site specific safety plans.

(d) If certain hazards are known before hand, the medical examination shall be developed to include the site specific hazard.

(e) New employee examinations and requests for upgrading medical test shall be the responsibility of the DRMS Safety Manager and employee's supervisor. A Memorandum, with a 10 day suspense, shall be sent to DRMS-FH, attention: DRMS Safety Manager.

9. The following procedures shall be reviewed and updated on an annual basis:

(a) Review each accident or illness reported to ensure it was promptly investigated. Evaluate the cause of each incident and make changes to health and safety procedures to reduce the potential for a repeat of the incident.

(b) Evaluate the efficiency of specific medical testing in the context of potential site exposures.

(c) Add or delete medical tests as suggested by current industrial hygiene and environmental data.

(d) Review potential exposures and the site safety plans at long term sites to determine if additional testing is required.

B. PERSONAL PROTECTION EQUIPMENT

1. All TPPM entering a hazardous waste site must be protected against potential hazards. The purpose of personal protective equipment (PPE) is to shield the employee from potential threats of chemical, physical, and biological hazards that may be present at the site. Careful selection and use of PPE should protect the employee's respiratory system, skin, eyes, face, hands, feet, head, body, and hearing from harmful exposures.

2. Prior to any TPPM conducting a new site visit, a conference shall be held with the DRMS Safety Manager and on-site safety officer to review the conditions and work to be performed on site. The Safety Manager/officer shall provide recommendations for the proper PPE to be worn. Reports of site conditions shall be readily available for review by the DRMS Safety Manager. The PPE selection shall coincide with the Site Safety and Health Plan, discussed in Chapter 4.

3. TPPM are not authorized to wear PPE at hazardous waste sites where PPE Levels A or Level B protection (self-contained breathing apparatus) are required for on site operations (see enclosure 6). This volume reaffirms the Dec. 1988, DRMS-H policy directive that prohibits the entry of DRMS employees on any

uncontrolled hazardous waste site exclusion area where Level C PPE or higher is required without prior authorization from the DRMS Safety Manager.

4. No DRMS employee shall be permitted to work in Level A or Level B of PPE, except in an emergency escape situation (see enclosure 4). The following is a summary of levels D and C of PPE:

(a) Level D equipment requirements:

- (1) Coveralls (cotton or tyvek).
- (2) Safety boots/shoes.
- (3) Hard hat.
- (4) Safety glasses or chemical splash goggles.
- (5) Gloves (optional).
- (6) Escape mask.
- (7) Face shield (optional).

NOTE: Criteria for Level D: Sites where a reasonable determination has been made that exposure to hazardous property is unlikely. No respiration protection required. Minimal skin protection required.

(b) Level C equipment requirements:

- (1) Full-face piece, or half-mask face piece air-purifying respirator.
- (2) Emergency escape respirator (optional).
- (3) Chemical-resistant clothing, tyvek-polyethylene clothing.
- (4) Gloves, inner (surgical type).
- (5) Gloves, outer (chemical-resistant), nitrile or viton.
- (6) Safety boots/shoes, safety (optional).
- (7) Disposal boot covers (chemical protective).
- (8) Hard hat.

NOTE: Criteria for Level C: Sites with known contaminants have good warning properties. Do not approach Immediately Dangerous to Life or Health (IDLH) concentrations, and do not exceed the maximum use concentrations of respirator cartridges. Air must contain at least 19.5 percent oxygen.

5. The TPPM may be required to work under inclement weather conditions (extreme heat and cold climates) dressed in Level C or D PPE for periods up to ten hours per day. In addition, employees may be on site from 1 day to 2 weeks per month, with the possibility of continuous on site visits for several months or years. Contaminated clothing and Level C outer wear will not be reused, but disposed of on site.

6. At sites where specific site safety plans have been developed, the TPPM will follow the plan's criteria for PPE use and selection.

7. Users of respirators shall follow the DRMS Respirator Protection Safety Program developed for TPPM, as provided in DRMS-I 6000.1, Enclosure 4, Chapter IV. Proper selection of PPE is of the primary concern when choosing which cartridges to use with the respirator. The TPPM shall use site specific data that describes site conditions, follow guidance from the DRMS Safety Manager/on-site safety officer and adhere to the site specific safety plan for selection of the appropriate respiratory protection equipment.

8. The TPPM shall store PPE in a designated storage cabinet located in the Environmental Processes SHO offices or field activity facility. The TPPM shall have direct access to this equipment at all times. DRMS field activities should also store PPE in a designated storage cabinet and request additional PPE through normal budget procedures.

9. PPE may be ordered by submitting a DLA Form 123. This form shall include a concurrence from the DRMS Safety Manager. Defense Environmental Restoration Account (DERA) funds may be used to procure PPE equipment required to support the DRMS third party program. This equipment includes such items as: safety boots, safety glasses, tyvek coveralls, full face respirators, cartridges, rubber gloves and boot covers, and first aid kits.

C. TRAINING.

1. DRMS employees engaged in hazardous substance removal or other activities which expose or potentially expose them to hazardous substances and health hazards, shall receive no less than the minimum training as required by OSHA before they are permitted to work on site. The TPPM must recognize and understand the potential hazards to their health and safety associated with working at an uncontrolled hazardous waste site. Employees shall be thoroughly familiar with protocols and procedures in the site safety plan and operations in progress at the site.

2. The objectives of the DRMS training program are:

(a) To make the employee aware of the potential hazards they may encounter while working at a uncontrolled hazardous waste site.

(b) To provide the technical knowledge and skills necessary to perform the work with minimal risk.

(c) To make the employee aware of the safe use and limitations of safety equipment.

(d) To ensure that all employees have sufficient information to avoid injury and are familiar with emergency escape procedures.

(e) To provide the opportunity for the employee to become familiar with the PPE equipment in a nonhazardous situation.

3. The specific training requirements for the TPPM shall include the following:

(a) TPPM are required to complete 40 hours of training (off the site) in hazardous substance removal operations in compliance with OSHA regulations, 29 CFR

Part 1910.120. The training must include PPE, safety, hazardous incident response operations and, air and sampling procedures. DRMS Operations East/West employees who work third party sites must also receive this training.

(b) Upon completion of the 40 hours of classroom training, employees must complete a minimum of 3 days of actual field experience under the direct supervision of a trained, experienced, supervisor. This training shall be coordinated through the DRMS Safety Manager's Office.

(c) HQ DRMS third party program supervisors and Operations East/West supervisors responsible for supervising employees engaged in hazardous substance removal operations, shall receive at least 8 hours of OSHA training in hazardous site operations, which includes the medical surveillance program and PPE requirements.

(d) All TPPM and supervisors shall receive 8 hours of refresher training annually by a trained, experienced, and knowledgeable instructor.

(e) Employees may be exposed to unique or special hazards which may warrant additional training. The level of training provided shall be consistent with the employee's job function and on site responsibilities.

4. The third party program includes response actions for simple property retrieval, removal actions designed to stabilize a site from any immediate threat of a release to the environment, and site remediation involving a permanent remedy. Because of the diversity of the program, suggested additional training includes:

- (a) Air surveillance techniques.
- (b) Soil and groundwater sampling.
- (c) Remedial Investigation/Feasibility Study process.
- (d) Techniques for remediation of hazardous waste sites, and;
- (e) Effective management of hazardous waste sites.

5. A record of each employee's training shall be maintained in the employee's official DRMS personnel file (OPF), and on their supervisor's file (7B card). These records will confirm that employees assigned to the third party program have completed the minimum required to comply with OSHA for work operations at uncontrolled hazardous waste sites.

(DRMS LETTERHEAD)

DRMS-FH

MEMORANDUM FOR DRMS-SH

SUBJECT: Medical Surveillance for Third Party Employees

1. Enclosed is a medical surveillance procedure for our third party employees. The medical unit has been given a copy and agreed to these procedures.
2. Appropriate examinations will be administered in accordance with the attached medical exam and employees will be notified.
3. Should you have any questions, please contact Tom Daum, X5917.

JEFFREY E. PFANNES
Chief, Safety, Health
And Equipment Division
Office of Field Support

cc:
J. Hunn

SAMPLE

ENCLOSURE 1

CHAPTER II

DRMS-I 6000.1

MEDICAL SURVEILLANCE PROCEDURES
FOR DRMS THIRD PARTY EMPLOYEES

1. Upon receipt of all Safety and Health Site Plans, photocopy all MSDS sheets and any laboratory reports resulting from sampling. Submit copies to DRMS Safety and Health (DRMS-FH).
2. Baseline medical examinations will be given to all new employees.
3. Annual or periodic medical examinations will be given and testing will be in accordance with the attached medical form.
4. Employees accidentally exposed to any chemicals while visiting a contaminated site, must fill out a Mishap Report (DLA Form 1591) and list all chemicals to which they were exposed. Material Safety Data Sheets (MSDS) must accompany the accident report, when these MSDSs exist. The Mishap Report will be submitted to DRMS-FH, and kept with the employees medical file for the next physical exam, or if symptoms occur which could warrant an immediate examination.
5. Obtaining MSDS sheets or laboratory analyses forms are the responsibility of the employees. It is advisable they maintain these records in their personal file.
6. Physical examinations will not be issued without the approval of the Safety and Health Manager. The employee will fill out the top half of page one and list any exposures or health problems since the last physical. The Safety and Health Manager will approve and forward the examination form to the medical unit. The medical unit will arrange a time and date for the examination and notify the employee.
7. Further testing will be approved by the Safety and Health Manager, should any symptoms appear to be related to any occupational health exposures.

<SAMPLE DEFENSE REUTILIZATION AND MARKETING SERVICE - PHYSICAL EXAMINATION
REQUIREMENTS>

ENCLOSURE 1

CHAPTER II

DRMS-I 6000.1

PARTICIPATING EMPLOYEES

1. Hazardous waste sites pose a multitude of health and safety concerns, any one of which could result in serious injury or death. These hazards are a function of the nature of the site as well as a consequence of the work being performed, and could include chemical exposure, fire and explosion, oxygen deficiency, ionizing radiation, biologic hazards, safety hazards, electrical hazards, heat stress, cold exposure and noise. Hazards are further compounded by such factors as uncontrolled conditions and the large variety and number of substances that may be present at the site.

The combination of all these conditions results in a work environment that is characterized by numerous hazards which may pose an immediate danger to life or health; may not be immediately obvious or identifiable; may vary according to the location of the site and the task being performed; and may change as site activities progress.

The medical surveillance program has been established to ensure that the health of employees is not compromised by potential exposure to the hazards found at hazardous waste work sites. This program is designed to support and monitor the effectiveness of the primary health and safety goal of controlling worker exposure to toxic materials. The objectives of the medical surveillance program are to:

- O Medically qualify individuals to work at hazardous waste sites.
- O Monitor medical records to quickly respond to health problems.
- O Monitor the effectiveness of exposure controls in site safety plans.

This program follows guidelines developed by NIOSH/USCG/EPA, ANSI Standards OSHA Regulations 29 CFR 1910.120 (Hazardous Waste Operations and Emergency Response), 29 CFR 1910.1001 and 29 CFR 1926.58 (Asbestos, Tremolite, Anthophyllite, and Actinolite); and Federal Motor Carrier Safety Regulations 49 CFR 391.41-Subpart E. Physical protocols will be modified to include the requirements of other specific regulations (such as OSHA lead standards) as the need arises.

DRMS employees are required to participate under this medical surveillance program and to be monitored under Federal regulations.

As a guideline, it will be assumed that all participating employees will be required to wear a respirator with usage ranging from occasional to a daily basis. The type of respirators used will include full-face supplied air, self-contained breathing apparatus, and full-face air purifying respirators. The level of work will range from light to moderate in Group B. DRMS employees would never, under any circumstances, be exposed to Group A.

2. GROUP A.

This group will consist of individuals who will be provided with maximum surveillance because they meet the minimum standards necessary for close medical observation. These minimum standards are as follows:

O All employees who are, or may be, exposed to hazardous substances or health hazards at or above the permissible exposure limits or, if there is no permissible exposure limit, above the published exposure levels for these substances, without regard to the use of respirators, for 30 days or more per year.

O All employees who wear a respirator for 30 days or more per year, or as required by 29 CFR 1910.134.

This group consists of those individuals who will have a pre-employment medical examination, an annual examination, and an exit medical examination. Other periodic exams will be scheduled as needed, such as: following an accident, complaints of symptoms of an exposure, and medical necessity.

3. GROUP B.

This group includes those individuals who may have contact with the toxic materials at hazardous waste sites. However, by nature of their job activities, the contact is more incidental than the Group A. This group consists primarily of administration or management personnel who wear a respirator less than 30 days per year. These individuals will have a pre-employment medical examination, a periodic examination at least every 2 years (as permissible by 29 CFR 1910.120(f)(3)(b) and as directed by a physician) and an exit medical examination.

Other periodic exams will be scheduled as needed, such as following an accident, complaints of symptoms of an exposure, medical necessity, and as required by contractual obligations. After age 50, an employee in Group B will have examinations at least annually.

DRMS employees are considered to fall under the Group B Category.

4. OTHER PARTICIPATING EMPLOYEES

Employees who do not fall within the above categories are not to be included under this medical surveillance program. However, other personnel may be monitored on a case-by-case basis. An example would be DRMS industrial hygienists performing asbestos abatement oversight. These personnel must be approved by DRMS-FH Safety and Health Manager.

MEDICAL DEFENSE REUTILIZATION AND MARKETING SERVICE
TESTING AND PROCEDURES

Following is a compilation of the tests, procedures, and suggested guidelines to be used during the execution of the Medical Surveillance Program.

1. OCCUPATIONAL AND MEDICAL HISTORY

The Occupational and Medical History should emphasize previous chemical or physical exposures which have an impact on the systems listed below. (It is the responsibility of the employee to accurately complete the history section and the physician's to review and evaluate the history.)

- Nervous
- Skin
- Musculoskeletal system
- Pulmonary
- Blood Forming
- Cardiovascular
- Gastrointestinal
- Genitourinary
- Reproductive
- Ear
- Nose
- Throat

2. PHYSICAL EXAM

The physical exam should consist of the following parameters:

- Height, weight, temperature
 - Pulse, respiration, and blood pressure - before and after 1 minute of exercise.
- A total of three sets of vital signs are to be taken.
- Evaluate cardiac reserve through simple exercise testing (example: jumping jacks for 1 minute)
 - Head, nose, throat
 - Eyes
 - Ears
 - Breast exam (females 30 years and older and/or physician's discretion)
 - Extremities (conduct Tinel's and Phalen's test for Carpal tunnel Syndrome)
 - Peripheral vascular system
 - Abdomen and rectal (include hernia exam)
 - Back, spine, and musculoskeletal systems
 - Genitourinary system
 - Skin
 - Nervous System

3. TESTING AND PROCEDURES

Testing under this program must be conducted as referenced and/or following these guidelines.

O Audiometric Test: Using the guidelines established by ANSI 1969 Standard, 2,000, 3,000, 4,000 and 6,000 hertz (hz) pure tone in an approved booth. Test should be administered by a qualified technician and results read by a certified audiologist or a physician familiar with audiometric evaluation (Reference 29 CFR 1010.95.)

O Biochemical Profile: (SMAC-23, Chemzyme, or equivalent) to include:

A/B Ration (Cal)	Globulin, Total (Cal.)
Alanine Aminotransferase (ALT)	Glucose
Albumin	Iron, Total
Alkaline Phosphatase	Lactate Dehydrogenase (LD)
Aspartate Transaminase (AST)	Phosphorus, Inorganic
Bilirubin, Total	Potassium
BUN/Creatinine Ration (Cal.)	Protein, total
Calcium	Sodium
Carbon Dioxide	Triglycerides
Cholesterol, Total	Urea Nitrogen (BUN)
Creatinine	Uric Acid

NOTE: Two cc of serum should be saved from all blood samples until laboratory values are received and confirmed. After receipt of lab report, discard the sample.

O EKG or EKG Stress Test: A standard 12 lead EKG is mandatory on all candidates for employment. The EKG will be repeated annually for covered employees over age 35, or as indicated by medical findings.

O An EKG stress test must be substituted for the EKG for employees that fall into the following categories:

- History: Regardless of employee's age, if there is a strong family history of heart disease including angina, hypertension, and myocardial infarctions at a relatively young age.

- Age: Individuals over 40 with a positive history of obesity, cigarette smoking, and respiratory symptoms such as asthma.

- General condition: Those individuals who are in marginal to poor physical condition over the age of 40.

- Guaiac Stool for Occult Blood: This test is to be performed as a screen for hidden G.I. malignancy. Testing should be performed on all employees age 40 and over; employees with a positive history of asbestos exposure; and at the discretion of the examining physician.

O RBC Cholinesterase: A baseline specimen must be collected at the preemployment physical. A second baseline specimen must be collected prior to working at any job site involving pesticides.

O Heavy Metal Evaluation: (Blood - quantitative analysis for arsenic, lead, mercury.) Testing is to be conducted on:

- Employees with recent hazardous exposure to heavy metals.
- New employees with uncertain previous exposure history (Baseline.)

o Pulmonary Function Test: Testing must be conducted following 1987 American Thoracic Society (ATS) update on standardization of spirometry. Measurement should include forced expiratory volume in one second (FEV1), forced vital capacity (FVC), and FEV1 to FVC ratio with interpretation and vital comparison to normal predicted values corrected for age, height, race, and sex. A direct hard-copy tracing (flow curves), independent of a micro processor, for each and every trial must be included.

O Tetanus Toxoid Immunization: Initial immunization or assurance of adequate immunity to tetanus should be addressed at pre-employment (baseline) examinations only.

O Urinalysis: Note color and appearance; urine dipstick test for specific gravity; pH; glucose, protein, bile, and acetone; blood.

- Microscopy examination is required only when dipstick test is positive.

O Vision Acuity Testing: Must measure refraction, depth perception, and color vision. Results must be expressed in values comparable to the standard Snelling test. The use of contact lenses or corrective lenses should be noted on the record.

4. ADDITIONAL MEDICAL PROCEDURES - SPECIAL

- o Biological exposure indices for specific agents
- o Exposure-specific toxins
- o nerve conduction velocity studies
- o Pseudocholinesterase

ENCLOSURE 2

CHAPTER II

DRMS-I 6000.1

<STANDARD FORM 93 - SAMPLE>

ENCLOSURE 3

CHAPTER II

DRMS-I 6000.1

<CA-1, Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation - SAMPLE>

ENCLOSURE 4

CHAPTER II

DRMS-I 6000.1

<CA-1, Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation - SAMPLE>

ENCLOSURE 5

CHAPTER II

DRMS-I 6000.1

<CA-2, Notice of Occupational Disease and Claim for Compensation - SAMPLE>

ENCLOSURE 6

CHAPTER II

DRMS-I 6000.1

Types of Atmosphere - Supplying Respirators.

Types of Air-Purifying Respirators (Level C)

CHAPTER III

DRMS-I 6000.1

CHAPTER III - ON SITE VISITS

A. INTRODUCTION.

1. On-site visits for DRMS third party program shall be conducted for the following purposes:

a. To gather information on the history of the site, its operations and important characteristics of the site.

b. To show DRMS' willingness to work with a Federal, state, local or other government agencies to resolve a potential environmental problem.

c. To evaluate the extent of site contamination and environmental effects of the contaminants.

d. Participate in meetings with the general public, PRP groups, removal contractor and/or regulatory agencies.

e. To monitor removal/remedial work where DRMS is involved through a formal agreement with EPA, state, local or other government agency, PRP group or private individual.

B. BACKGROUND

1. Off Installation - DRMS third party sites may pose a multitude of health and safety hazards, any one of which could result in serious injury or death to site workers. The hazards may include:

- (a) Chemical exposure.
- (b) Fire and explosion.
- (c) Oxygen deficiency.
- (d) Ionizing radiation.
- (e) Biologic hazards.
- (f) Physical hazards.
- (g) Electrical hazards.
- (h) Heat stress.
- (i) Cold exposure.
- (j) Noise.

2. Several factors distinguish a hazard waste site from other occupational situations involving hazardous substances:

(a) Uncontrolled condition of the site. Extremely hazardous substances do not endanger human health or safety if they are properly handled and managed. However, the improper use or management of these substances could result in a harmful release to the environment and cause a threat to the public health and welfare.

(b) Variety and quantity of hazardous substances present at a site. Any individual site may contain hundreds of different chemicals. In most instances, an accurate assessment of all chemical hazards is impossible due to the potential for interactions among these substances.

(c) Disorderly physical environment. TPPM are subject to the hazards of direct exposure posed by the disorderly manner of the site and the stress of working in PPE.

3. Any combination of the above factors could result in a working environment characterized by numerous hazards which:

(a) May pose an immediate danger to life or health.

(b) May not be immediately obvious or identifiable.

(c) May vary according to location on site and the task being performed.

(d) May change as site activities progress.

4. Many of these sites contain hazardous substances that have been abandoned or simply mismanaged by their owners. The size of the site will vary from a few drums to over 20 acres, including many on EPA's National Priority List (NPL). All have the potential to pose a serious health and safety risk. Thus, the primary concerns of the TPPM while working on site, are to minimize exposure to hazardous substances and the strict adherence to the site health and safety plan.

C. PROCEDURES:

1. The TPPM shall conduct on site visits as part of a fact finding effort, or to monitor response actions being undertaken by DRMS or PRP contractors. This work may include: data gathering of information from containers on site, overseeing the retrieval of property, the removal of hazardous substances or site remediation. A typical organization structure for a third party site response action is provided at enclosure 1.

2. Frequent site visits may be required to ensure cleanup contractor is following the work schedule in removal plans, to monitor project cost and to meet with representatives of the regulator agency. As a result, employees may be exposed to contaminated soils by walking on-site and by inhalation of airborne contaminants. The TPPM shall sign the hazardous waste manifest and other related shipment documents as authorized by the Chief, Environmental Division, Directorate of Disposal Management and Environmental Protection, DRMS-SH (see enclosure 2).

3. At no time shall the TPPM physically handle hazardous substances while on site. In addition, DRMS employees may not perform any strenuous physical work while on-site. Site visits shall be limited to data gathering, meetings, walk throughs and/or general observation of the cleanup contractor's work.

4. The following procedures shall be implemented by DRMS offices involved in these sites:

(a) DRMS-SH, as the lead office, will:

(1) Designate a project manager who shall coordinate with the DRMS Office of Counsel (DRMS-G).

(2) Identify DRMS staff required for the on-site visit or to conduct a records search.

(3) Identify other DoD, Federal, state and local agency staff who should participate in the on-site visit (i.e., USACE, AEHA, AMCCOM, and EPA).

(4) Notify participants of the date, time and place of the on-site visit.

(5) Notify DRMS Operation East/West of the date and purpose of new on-site visits occurring in their areas and whether DRMS field activity employee's participation is needed.

(6) Ensure DERA funding is available to cover travel expenses.

(7) Arrange for access to the site from private property owner or from the regulatory agency involved.

(8) If new site, arrange a pre-site visit and telephone conference to review the purpose of the site walk through and discuss role of each participant.

(9) Request that a regulatory official participate in the pre-site visit or telephone conference, take the lead for the review of health and safety procedures, including training and PPE requirements.

(10) Ensure only DRMS employees qualified to wear PPE are allowed on-site, if PPE above Level D is required (see Chapter 2, Section C).

(b) DRMS-SH on-site evaluation shall include the following activities (see SOP for Site Investigations and removal actions at enclosure 3):

(1) Gathering information and documents:

a Conducting interviews

b Review of regulatory agency environmental assessments and testing results.

c Obtain sales and disposal contracts records, turn-in documents, review container markings and labeling, FSCs, NSNs, other relevant documents.

d Photographs, video tapes, and diagrams of site.

(2) Identify and describe site conditions, hazardous substances found on site, and other visible geographic, topographic, and environmental factors:

yard, factory).
a Type of site (i.e., landfill, spill, abandoned material, scrap

b Date of disposal and release.

c Identity of chemicals and substances present.

d Quantity of chemicals and substances present.

e Extent of area contaminated.

f Media contaminated (surface water, ground water, soil, air).

g Physical characteristics of site (water tables, soil conditions, terrain).

h Physical characteristics of surrounding area.

i Identify the potential threat to health and safety (i.e., location near populated area/school/public facilities, threat of fire or explosion, migration of contaminants, effect on drinking water supplies).

j Threat to environment (sensitive ecosystems, high levels of contaminants at or near soil surfaces, drums, barrels and other containers posing a threat of release).

k Weather conditions that could effect release and/or migration.

l Public awareness and media attention.

(c) The DRMS-SH TPPM shall summarize his/her findings in a formal trip report, and:

(1) Forward a copy to DRMS-G, DRMS-XB, and other DRMS offices as necessary.

(2) Provide a copy to the Claims Investigation Officer (if appointed).

(3) Provide a formal copy of the trip report to the Safety and Health Manager.

(4) Use information to monitor or develop the scope of work for the retrieval, removal or remedial response actions.

5. On site visits may be required for several reasons. They may be critical to gathering site specific information and/or documents and to deciding if DRMS should participate in a response action. Site visits shall also be conducted to participate in regulatory and/or public information meetings, to monitor removal contractor's performance and to update the site's administrative record.

ENCLOSURE 1

CHAPTER III

DRMS-I 6000.1

< A typical organization structure for a third party site response action >

ENCLOSURE 2

CHAPTER III

DRMS-I 6000.1

DRMS-D ((FAX) (DSN) 932-5907)

SUBJECT: Execution of Hazardous Waste Manifests and Related Documents for DRMS
Third Party Response Action

TO: DRMS-S

1. MR. JOHN MATHERLY (primary) DRMO Meade and MR. ED SCHWENK, (alternate) DRMO Meade, and MR. BRUCE NOBLE, (alternate) DRMS-SHP, Environmental Protection Specialists, are hereby authorized and directed to execute any and all hazardous waste manifests for the Defense Reutilization and Marketing Service (DRMS) as the generator for the Rogers Electric Company Site, Cheverly, MD. This authority applies to the execution of any other documents including, but not limited to, Land Disposal Restriction Notification Forms, Waste Profile Sheets and forms required by state regulatory authorities, necessary or incidental, to the completion of the manifests for the transportation and disposal of hazardous substances from the site.
2. This authority is limited to the Roger Electric Company Site, 5720 Columbia Park Road, Cheverly, MD. Mr. Matherly and/or Mr. Schwenk shall assure that all procedures required for the above documents are implemented, including the assembly, distribution, and retention of all appropriate certifications and other documents.
3. The execution of manifests for this site shall be considered for all purposes to be within the scope of duties and employment by and for DRMS.
4. Copies of all signed documents shall be filed in the DRMS-S project file and DRMO files.
5. This authorization is effective until revoked by me or until the response action at the Rogers Electric Company site is completed.

DONALD A. HEMPSON
Captain, SC, USN
Commander

S A M P L E

ENCLOSURE 3

CHAPTER III

DRMS-I 6000.1

STANDARD OPERATING PROCEDURE FOR DRMS THIRD PARTY SITES

For use at sites, where DRMS is the primary Potential Responsible Party (PRP) and the lead agency conducting the response action. These sites are the result of past sales actions of DoD surplus property or hazardous waste disposal contracts.

I. PHASE I - INVESTIGATION

1. DRMS notified of hazardous waste site from a DRMO, DRMS-DE, DRMS-DW, USEPA, State, County or private citizen. The initial notification may be by telephone or letter.

2. Inform DRMS-SH, DRMS-G, and the appropriate DRMS field activity of new site.

3. Begin investigation.

a. Telephone individual or agency who identified DRMS as a PRP to obtain additional information about site history and site Condition. Request specific information regarding the assistance sought from DRMS. General request for property retrieval or removal should be formally submitted in writing and addressed to the Chief, Division of Environmental Protection, DRMS-SH, 74 North Washington Street, Battle Creek, MI 49017-3092. Request for assistance by EPA under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) section 104(e) and 107 should be sent to the Commander, DRMS-D, address same as noted above.

b. If information obtained indicates that site resulted from a past DRMS disposal contract or sales action, DRMS-SH will initiate the following actions:

1. Disposal Contract:

a. (DRMS-SH) Write a Memorandum to DRMS-P requesting the retrieval of any records concerning contractor(s) involved in site. Provide site specific background including: name of owners, type of business, dates of operation, and DRMO involved.

b. (DRMS-P) Advise DRMS-SH (in writing) of the results of their records search. DRMS-P will also indicate the location of site related contract records and the number of contract document boxes that will need to be evaluated.

2. (DRMS-S) Sales Contract:

a. Check the DRMS sales history database located in DRMS-SHO.

b. Send a letter through DRMS-DW and/or DRMS-DE to the appropriate DRMO requesting a records search for local sale documents or corporate knowledge of buyers, site of company(s) involved in site.

c. Request a DAISY sales history extract through DRMS-SOR based on turn-in documents and NSNs, if available.

d. (DRMS-G) Produce a Dun & Bradstreet report on individual(s) and/or company(s) involved in the site.

e. Determine if the work required for the record search justifies use of any outside consultant service. If a consultant is required the following actions shall be taken by the TPPM.

1. Prepare statement of work (SOW) for issuance of a delivery order. DRMS-G concurrence is required. DERA funding must be available to support delivery order cost.

2. Forward delivery order to DRMS-SH for signature.

4. (DRMS-SH) Site Visits:

a. Prior to conducting the on-site visit, the TPPM shall obtain as much health and safety information about site from the regulatory agency or private individual involved. This information may be obtained from written reports or from discussions over the telephone. Documents may be faxed to the TPPM. The likelihood of leakers, odors, and improper storage of hazardous substances should be determined in advance of the site visit.

b. Follow the site specific safety plan, if one has been developed. This plan must be approved by the DRMS Safety Office, DRMS-FH. If a site safety plan has not been developed, the TPPM shall write it using the Generic Safety and Health Plan provided in this instruction, Chapter 4, Enclosure 1, Attachment 1.

c. The purpose and date of the site visit shall be discussed with the safety officer. The TPPM shall obtain concurrence from the DRMS Safety Office for site visit. This will include Personal Protective Equipment (PPE) that shall be worn by the TPPM. The DRMS Safety Office shall be kept up to date about the site conditions up until the site visit is conducted.

d. If site conditions require PPE above the DRMS authorized level (up to level C), DRMS shall seek assistance from the Department of the Army, Huntsville Division, Corps of Engineers (USACE), P.O. Box 1600, Huntsville, Alabama 35807-4301. The TPPM shall contact the Program Manager, Environmental and Support Programs Division at (205) 955-5143. The Huntsville Division will provide the assistance as requested or refer request to another Corps Office such as the Anchorage or Omaha District offices.

e. DRMS shall be responsible for funding the USACE site visit cost. DERA funds shall be sent by a Military Interdepartmental Purchase Request (MIPR) to the appropriate Corps office (see sample at attachment 1). The MIPR shall be initiated by DRMS-SHP and processed through DRMS-DFAS.

f. The TPPM or designated representative shall inventory the size and number of containers, contents, full, partial or empty, weights (if available) NSNs, DTID documents and sale or disposal contract markings.

g. Any leakers should be identified, area of spills located, unknown chemicals identified and overpacking requirements documented. Photographs and/or video should be taken of site. The TPPM will also determine if chemicals are in DOT approved containers that can be used for transportation. The information obtained

from the site visit shall be used to develop cost estimate and to determine DRMS liability.

h. Remove DTID document (DD Form 1348-1) from containers if found at site. Record for trip report the type of container DTID found on and all other pertinent information e.g. NSNs, size, contents, full or empty etc. Attach DTID document to field notes.

i. (DRMS-SH) For any DTID documents or NSNs found on site request DRMS-C run a IDMS extract. Request a XS-4 and XS-7 records search for the time period in question. Attempt to identify generating DRMO. Through DRMS-DW and/or DE request the generating DRMO search their files for local auction records.

5. (DRMS-SH) Site Response Determination:

a. Complete trip report within 3 days of return from site visit. Brief DRMS-SHO and SH on findings from trip report as necessary. Copy of trip report should be sent to DRMS-SH, DRMS-G, and the DRMS field activity providing support.

b. Determine if DERA funding is available and can be spent on site. If funding is not available, determine if funds can be taken from other third party sites. Coordinate funding through the DRMS-SHP, DERA funding manager. Advise DLA-CAAE (by telephone) of funding revisions. Prepare Telephone conversation record for project file and send copy to DRMS-SHP DERA funding manager.

c. Set up a meeting with DRMS-SHO, SH and G to present recommendation for DRMS to participate in response action at site or to deny request for assistance. Recommendation should be supported by site records or other specific documents.

d. Prepare DLA Staff Summary Sheet (DLA Form 101) for DRMS Commander to approved DRMS-SH/G recommendation.

II. PHASE II - REMOVAL

1. Hazardous Waste Removal Action

a. Inform the DRMS Public Affairs Office, DRMS-XB, of planned removal. Information provided shall include: role of DRMS, name of removal contractor, date and time of removal action.

b. Prior to removal action the site owner must sign a Site Access Agreement. The agreement can be faxed to owner for signature. A cost sharing agreement, to help fund removal cost, should be pursued with the site owner. (See attachment 2.)

c. DRMS or the site owner may be required to obtain an EPA identification number from the site regulatory agency for use on the HW Manifest form. If site involves a one-time removal, request a provisional EPA ID number. This number can normally be obtained by telephone. The period in which the number will be used should be determined. If an EPA ID number cannot be obtained by telephone or a permanent number is required, complete EPA Form 8700-12, Notification of Regulated Waste Activity (see attachment 3). Prepare DLA Form 101 for DRMS-D signature on EPA forms.

d. If DRMS is the lead agency for the removal action, request DRMS-SH signature authority for the TPPM to sign HW Manifests Forms and other shipments documents on his behalf of DRMS. Submit a Memorandum to DRMS-SH requesting this

authorization. An alternate signature authorization should be included with request.

e. If DRMS-PH performs contracting:

1. The TPPM shall work with DRMS-SHO to prepare a SOW or contract modification, site inventory, estimate weights, identify safety plan requirements, sampling, and identifying any other special requirements.

2. The SOW shall be hand carried to the assigned DRMS-PH contracting officer.

f. If USACE performs contracting:

1. Contact USACE Huntsville Division, and determine whether the Huntsville or other USACE office will conduct removal action.

2. Request DRMS-SHP DERA funding manager, MIPR funds to the appropriate USACE office.

3. DRMS-PH shall request names of transporters and TSDFs from the proposed removal contractor, so DRMS can approve their use prior to awarding contract and/or removing wastes from the site.

g. If EPA performs contracting:

1. Provide letter of intent to EPA Regional Office undertaking work (see attachment 4).

2. **SITE REMEDIATION:** If remediation (removal of soils, cleanup of spills, groundwater contamination) is necessary the USACE, Huntsville Division shall be requested to do work.

3. **EMERGENCY ACTION:**

a. In rare instances it may be in the best interest of DRMS to respond quickly to adverse site conditions. In these instances, the USACE Omaha District or the EPA shall perform an immediate or rapid response action. This work will involve stabilization or removal of hazardous substances.

b. To perform an immediate or rapid response action DRMS must expedite its decision making process. This requires DRMS to determine liability for the site promptly. Liability will be determined jointly between DRMS-S and DRMS-G. This decision and recommendation will be processed through the DRMS-D command office using DLA Form 101. An emergency response action shall only be carried out with the written authorization from DRMS-D. DERA funding must be available to conduct a rapid response action.

c. Rapid Response Projects shall be submitted to the USACE Omaha District, using Rapid Form RR-01. A copy of this form is available in DRMS-SH.

ATTACHMENT 1

ENCLOSURE 3

CHAPTER III

DRMS-I 6000.1

<DD Form 448, Military Interdepartmental Purchase Request - SAMPLE>

ATTACHMENT 2
ENCLOSURE 3
CHAPTER III
DRMS-I 6000.1

ALPHABETIZED STATE LISTING OF HAZARDOUS WASTE CONTACTS

Alabama

Land Division
Alabama Department of Environmental Management
1751 Federal Drive
Montgomery, Alabama 36130
(205)271-7730

Alaska

U.S. EPA Region X
Waste Management Branch
MS HW-112
1200 Sixth Avenue
Seattle, Washington 98101
(206)442-0151

American Samoa

Environmental Quality Commission
Government of American Samoa
Pago Pago, American Samoa 96799
Overseas Operator Commercial call (684)
Country Code 663-2304

Arizona

Office of Waste & Water Quality Mgmt.
Arizona Dept. of Environmental Quality
2005 N. Central Avenue, Room 304
Phoenix, Arizona 85004
(602)257-2305

Arkansas

Arkansas Dept. of Pollution Control & Ecology
P.O. Box 9583
Little Rock, Arkansas 72219
(501)562-7444

California

California Dept. of Health Services
Toxic Substances Control Division
Dept. of Health Services
P.O. Box 942732, 400 P. Street
Sacramento, California 95814
(916)323-2913

Colorado

Hazardous Materials & Waste Mgmt. Div.
Colorado Department of Health
4210 E. 11th Avenue
Denver, Colorado 80220
(303)692-4830

Connecticut

Waste Management Bureau
Dept. of Environmental Protection
State Office Building
Hartford, Connecticut 06106
(203)566-8844

Delaware

Delaware Dept. of Natural Resources
& Environmental Control
Division of Air & Waste Management
Hazardous Waste Management Branch
P.O. Box 1401, 89 Kings Highway
Dover, Delaware 19903
(302)736-3689

District of Columbia

Dept. of Consumer & Regulatory Affairs
Environmental Control Division
Pesticides and Hazardous Waste Branch
2100 Martin Luther King Jr. Ave, S.E.
Room 204
Washington, D.C. 20020
(202)727-7000

Florida

Hazardous Waste Section
Dept. of Environmental Regulations
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(904)488-0300

Georgia

Land Protection Branch
Industrial and Hazardous
Waste Management Program
Floyd Towers East
205 Butler St., S.E.
Atlanta, Georgia 30334
(404)656-2833

Guam

Guam Environmental Protection Agency
IT&E
Harmon Plaza Complex, Unit D-107
130 Rojas St.
Harmon, Guam 96911
Overseas Operator
(Commercial Call (671)646-7579)

Hawaii

To Obtain Information or Forms Contact:
Department of Health
Hazardous Waste Program
P.O. Box 3378
Honolulu, Hawaii 96801
(808)548-2270

Mail Your Completed Forms to:

U.S. EPA Region IX
RCRA Programs Section
Hazardous Waste Management Division
1235 Mission St.
San Francisco, CA 94103

Idaho

Idaho Department of Health & Welfare
Tower Building, Third Floor
450 West State Street
Boise, Idaho 83720
(208)334-5879

Illinois

To Obtain Information or Forms Contact
U.S. EPA Region V
RCRA Activities
Waste Management Division
77 Jackson Street
Chicago, Illinois 60604
(312)886-4001

Mail completed forms to:

Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706
(217)782-6760

Indiana

To Obtain Information or Forms Contact:
Indiana Dept. of Environmental Mgmt.
105 S. Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46225
(317)232-3210

Mail completed forms to:

U.S. EPA Region V
RCRA Activities
Waste Management Division
77 Jackson Street
Chicago, Illinois 60604

***In Louisiana you must have an EPA ID number.**

Iowa

U.S. EPA Region VII
RCRA Branch
726 Minnesota Avenue
Kansas City, Kansas 66101
(913)236-2852 or
1(800)223-0425

Kansas

Bureau of Air & Waste Management
Dept. of Health & Environment
Forbes Field, Building 740
Topeka, Kansas 66620
(913)296-1600

Kentucky

Division of Waste Management
Dept. of Environmental Protection
Cabinet for Natural Resources
& Environmental Protection
Fort Boone Plaza, Bldg. #2
Frankfort, Kentucky 40601
(502)564-6716

***Louisiana**

Louisiana Dept. of Environmental Quality
Dept. of Solid and Hazardous Waste
P.O. Box 44307
Baton Rouge, Louisiana 70804
(504)342-1354

Maine

Bureau of Oil & Hazardous Materials Control
Dept. of Environmental Protection
Ray Bldg. Station #17
Augusta, Maine 04333
(207)289-2651

Maryland

Maryland Dept. of the Environment
Waste Management Administration
2500 Broening Highway
Baltimore, Maryland 21224
(301)631-3304

Massachusetts

Division of Hazardous Waste
Dept. of Environmental Protection
One Winter Street, 5th Floor
Boston, Massachusetts 02108
(617)292-5851

Michigan

To Obtain Information or Forms Contact:
Waste Management Division
Environmental Protection Bureau
Department of Natural Resources
Box 30038
Lansing, Michigan 48909
(517)373-2730

Mail completed forms to:
U.S. EPA Region V
RCRA Activities
Waste Management Division
77 Jackson Street
Chicago, Illinois 60604

Minnesota

To obtain Information or Forms Contact:
Solid & Hazardous Waste Division
Minnesota Pollution Control Agency
520 Lafayette Road, North
St. Paul, Minnesota 55155
(612)296-7282

Mail completed forms to:
U.S. EPA Region V
RCRA Activities
Waste Management Division
P.O. Box A3587
Chicago, Illinois 60690

Mississippi

Hazardous Waste Division
Bureau of Pollution Control
Department of Environmental Quality
P.O. Box 10385
Jackson, Mississippi 39289-0385
(601)961-5062

Missouri

Waste Management Program
Department of Natural Resources
Jefferson Building
205 Jefferson Street (13/14 floor)
P.O. Box 176
Jefferson City, Missouri 65102
(314)751-3176

Montana

Solid and Hazardous Waste Bureau
Dept. of Health and Environmental Sciences
Cogswell Bldg.
Helena, Montana 59620
(406)444-1430

Nebraska

Hazardous Waste Management Section
Department of Environmental Control
State House Station
P.O., Box 98922
Lincoln, Nebraska 68509-8922
(402)471-4217

Nevada

Waste Management Bureau
Division of Environmental Protection
Dept. of Conservation & Natural Resources
Capitol Complex
123 West Nye Lane
Carson City, Nevada 89710
(702)687-5872

New Hampshire

Department of Environmental Services
Waste Management Division
6 Hazen Drive
Concord, New Hampshire 03301
(603)271-2900

New Jersey

To Obtain Information:
New Jersey Dept. of Environmental Protection
Division of Waste Management
Bureau of Hazardous Waste Classification & Manifests
401 East State Street, CN-028
Trenton, New Jersey 08625
(609)292-8341

Obtain Forms from and Mail Completed Forms to:
U.S. EPA - Region II
Permits Administration Branch
26 Federal Plaza, Room 505
New York, New York 10278

New Mexico

New Mexico Health & Environment Dept.
Hazardous Waste Bureau
1190 St. Francis Drive
Santa Fe, New Mexico 87503
(505)827-2929

New York

To Obtain Information:
New York Dept. of Environmental Conservation
Division of Hazardous Waste Substances Regulation
P.O. Box 12820
Albany, New York 12212
(518)457-0530

Obtain Forms from and Mail Completed Forms to:
U.S. EPA - Region II
Permits Administration Branch
26 Federal Plaza, Room 505
New York, New York 10278

North Carolina

Hazardous Waste Section
Division of Solid Waste Management
Dept. of Environment, Health & Natural Resources
P.O. Box 27687
Raleigh, North Carolina 27611-7687
(919)733-2178

North Dakota

Division of Waste Management
Dept. of Health & Consolidated Laboratories
1200 Missouri Avenue
P.O. Box 5520
Bismarck, North Dakota 58502-5520
(701)224-2366

Northern Mariana Islands

To Obtain Information or Forms Contact:
Dept. of Public Health & Environmental Services
Division of Environmental Quality
Dr. Torres Hospital
P.O. Box 1304
Saipan, Mariana Islands 96950
Overseas Operator: (676)234-6984
Cable Address: Gov. NMI Saipan

Mail Your Completed Forms to:

U.S. EPA Region IX
RCRA Programs Section (H-2-3)
Hazardous Waste Management Division
1235 Mission Street
San Francisco, California 94103

Ohio

U.S. EPA Region V
RCRA Activities
Waste Management Division
77 Jackson Street
Chicago, Illinois 60604
(312)886-4001

Oklahoma

Oklahoma State Department of Health
Industrial Waste Division
1000 Northeast 10th Street
Oklahoma City, Oklahoma 73152
(405)271-5338

Oregon

Oregon Department of Environmental Quality
Hazardous Waste Operations
811 Southwest 6th Avenue
Portland, Oregon 97204
(503)229-5913

Pennsylvania

To Obtain Information or Forms Contact:
Pennsylvania Dept. of Environmental Resources
Bureau of Waste Management
P.O. Box 2063
Harrisburg, Pennsylvania 17120
(717)787-9870

Mail completed forms to:

U.S. EPA Region III
RCRA Programs Branch
Pennsylvania Section (3 HW51)
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Puerto Rico

To Obtain Information or Forms Contact:
Puerto Rico Environmental Quality Board
Land Pollution Control Area
Inspection, Monitoring & Surveillance
P.O. Box 11488
Santurce, Puerto Rico 00910-1488
(809)722-0439

Obtain Forms from & Mail Completed Forms to:

U.S. EPA Region II
Permits Administration Branch
26 Federal Plaza, Room 505
New York, New York 10278

Rhode Island

Division of Air & Hazardous Materials
Dept. of Environmental Management
291 Promenade Street
Providence, Rhode Island 02908-5767
(410)277-2808

South Carolina

Bureau of Solid Waste Management
Hazardous Waste Management
Dept. of Health & Environmental Control
2600 Bull Street
Columbia, South Carolina
(803)734-2500

South Dakota

Office of Waste Management
Dept. of Water & Natural Resources
Joe Foss Building, 523 East Capitol St.
Pierre, South Dakota 57501-3181
(605)773-3153

Tennessee

Division of Solid Waste Management
Tennessee Dept. of Health & Environment
701 Broadway
Customs House, 4th Floor
Nashville, Tennessee 37247-3530
(615)741-3424

***Texas**

Texas Water Commission
Compliance Assistance Unit
Hazardous and Solid Waste Division
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087
(512)463-8175

Utah

Bureau of Solid & Hazardous Waste Mgmt.
Department of Health
P.O. Box 16690
288 North 1460 West
Salt Lake City, Utah 84116-0690
(801)538-6170

***Renamed the Texas Natural Resource Conservation Commission**

Vermont

Hazardous Materials Management Division
Dept. of Environmental Conservation
103 South Main Street
Waterbury, Vermont 05676
(802)244-8702

Virgin Islands

To Obtain Information or Forms Contact:
Virgin Islands Dept. of Planning &
Natural Resources
Division of Environmental Protection
179 Altona and Welgrunst
St. Thomas, Virgin Islands 00801
(809)774-3320

Obtain Forms from and Mail Completed Forms to:

U.S. EPA Region II
Permits Administration Branch
26 Federal Plaza, Room 505
New York, New York 10278

Virginia

Virginia Department of Waste Management
Monroe Building, 11th Floor
101 North 14th Street
Richmond, Virginia 23219
(804)225-2667

Washington

Solid and Hazardous Waste Management Division
Department of Ecology Mail Stop FV-11
Olympia, Washington 98504
(206)459-6369

West Virginia

West Virginia Division of Natural Resources
Waste Management Section
1356 Hansford Street
Charleston, West Virginia 25301
(304)348-5393

Wisconsin

To Obtain Information or Forms Contact:
Bureau of Solid Waste
Department of Natural Resources
P.O. Box 7921
Madison, Wisconsin 53707
(608)266-1327

Mail Completed forms to:

U.S. EPA Region V
RCRA Activities
Waste Management Division
77 Jackson Street
Chicago, Illinois 60604

Wyoming

U.S. EPA Region VIII
Hazardous Waste Management Division (8HWM-ON)
999 18th Street, Suite 500
Denver, Colorado 80202-2405
(303)293-1795

Attachment 3
Enclosure 3
Chapter III
DRMS-I 6000.1

<EPA Form 8700-12 - Sample>

CHAPTER IV - SITE SAFETY PLAN AND RESPIRATOR PROGRAM

A. SITE SAFETY AND HEALTH PLAN

1. The purpose of the Site Safety and Health Plan (SSHP) is to meet OSHA requirements for protecting the safety and health of DRMS employees involved in hazardous waste site operations. The plan is developed to identify, evaluate, and control safety and health hazards, and provide for emergency response procedures for hazardous waste operations.

2. In general, the SSHP shall be prepared by the removal contractor and reviewed by qualified personnel for each hazardous waste site response action i.e., health physicist, industrial hygienist. Before the start of on-site operations, safety procedures must be written, distributed and reviewed by all work crews and visiting personnel who plan to enter site. DRMS employees will comply with the contractor's safety and health plan. A safety and health site checklist shall be completed by the TPPM for each site visit (see enclosure 1). A copy of the completed checklist must be filed in the project administrative file and a copy provided to the DRMS Safety and Health Manager.

3. The on-site safety procedures shall be reviewed regularly based on the work activities being conducted and equipment used by the contractor's work crews. At most third party sites, the contractor's safety manager will review the site safety plan with work crews before the start of each work day.

4. The safety plan must describe safety requirements for each phase of site operations and provide response actions for emergencies. The plan must include at a minimum:

(a) A safety and health risk or hazard analysis for each site task and operation found in the work plan.

(b) Employee training assignments.

(c) Description of personal protective equipment to be used by employees for each site task.

(d) Discussion of the medical surveillance requirements.

(e) Frequency and types of air monitoring, personnel monitoring, environmental sampling techniques and instruments to be used.

(f) Site control measures (see enclosure 2).

(g) Decontamination procedures.

(h) Emergency response plans.

(i) Confined space entry procedures.

(j) Spill containment procedures.

5. The site safety and health plan shall be prepared by the contractor responsible for the response action i.e. simple retrieval, removal or other response actions. The TPPM shall follow all procedures in the SSHP, unless otherwise directed by the site safety manager. Site inspections shall be conducted by the site safety and health officer or other appointed individual who is knowledgeable in occupational safety and health. These inspections will be used to determine the effectiveness of the site safety and health plan. Any deficiencies in the plan shall be corrected by the site safety officer. The site safety and health plan shall be prepared by the contractor responsible for the response action.

6. For some sites, such as those involving a site investigation of abandoned property or an uncontrolled hazardous waste site, a site specific safety and health plan will not be available. In these instances, the TPPM and the DRMS Safety Manager shall prepare a SSHP based on site specific conditions. This plan will focus on contaminants on site, and emergency response actions. Detailed communications, spill containment and decontamination procedures will not apply to the DRMS safety plan. DRMS third party staff shall not participate in an on-site response actions unless accompanied by a Federal, state or local regulatory official.

7. In general, the DRMS SSHP must include the following specific information:

a. Existing safety hazards and evaluation of health risks associated with conducting the site investigation.

b. List of key personnel responsible for site safety and for notification to the general public in the event of a release.

c. Levels of personnel protection equipment to be worn by workers. Refer to Chapter 2, Section B.

d. Site work zones.

e. Procedures to control site access.

8. To develop the site specific safety and health plan, background information must be obtained. This information should include:

a. Site location and name, i.e., owners, company's.

b. Site description, i.e., industrial, residential, rural.

c. Type of chemicals and quantities involved.

d. Hazards associated with each chemical.

e. Behavior and dispersion of material involved.

f. Types of containers, storage, or transportation methods.

g. Physical hazards.

- h. Prevailing weather condition and forecast.
- i. Surrounding populations and land use.
- j. Ecologically sensitive areas.
- k. Facility records.
- l. Summary of preliminary reports.
- m. Summary of off-site survey.
- n. Topographic and hydrologic information.

9. Information obtained from previous site characterization data shall provide the basis for developing the SSHP. Information must be included which describes the chemicals and hazards present at the site, illustrates the direction of chemical movement on and off the site, and explain the potential for contact with responders or the general public. This information and the work plan requirements provide the framework for a thorough safety plan.

10. The SSHP must be tailored to the site specific conditions and the environmental setting. As additional information becomes available, the safety plan shall be modified as necessary to ensure employee protection against new potential hazards and changing site conditions.

11. A generic SSHP is provided in Enclosure 3 to Chapter IV, of this instruction. This safety plan shall be written by the TPPM in cooperation with the DRMS Safety Manager.

12. The health and safety of on-site personnel are of major importance during any uncontrolled hazardous waste site operation. The SSHP shall include an analysis of the site hazards and provide specific procedures for minimizing the risk to personnel. As previously stated, the SSHP shall provide specific instructions and procedures to be followed by all personnel on-site. The plan shall evaluate both the general characteristics of chemical compounds present and other hazards that could affect personnel.

B. RESPIRATOR PROTECTION PROGRAM

1. The purpose of the Respirator Protection Program (RPP) is to provide written standard operating procedures for the selection, use and care of respirators in compliance with OSHA requirements. Emergency and routine uses of the respirator shall also be discussed in the plan. The objective of the RPP is to prevent atmospheric contamination to the TPPM from occupational diseases caused by breathing air contaminated with harmful dusts, fogs, fumes, mists, gases, smokes, sprays, or vapors.

2. The RPP shall be provided for DRMS third party employees engaged in hazardous waste site operations and when such equipment is necessary to protect the health of the employee (see Enclosure 4 to Chapter IV of this instruction).

3. Minimum requirements for the RPP are:

- a. Respirators shall be selected based on the potential for employee exposure to hazards and the specific type of hazards on site.
- b. Employees shall be provided instruction and be trained in the proper use of respirators and their limitations.
- c. Respirators shall be thoroughly cleaned and disinfected after each use.
- d. Respirators shall be stored in a convenient, clean and sanitary location.
- e. Respirators shall routinely be inspected during cleaning by the employee. Worn or deteriorated parts should be replaced.
- f. Employee shall use good safety practices in monitoring on-site work conditions to minimize the potential for harmful exposures or stress related injury.
- g. The RPP shall be reviewed annually and amended, as necessary, to ensure the effectiveness of the program. See Enclosure 4 to Chapter IV of this instruction for DRMS Respirator Protection Program.

4. DRMS employees shall not be assigned work tasks requiring the use of respirators unless they have been determined physically fit to wear a respirator and received the appropriate training. The DRMS local physician or the employee's own physician shall determine the health and physical condition of the employee. A review of the employee's medical condition shall be conducted annually.

5. DRMS shall provide adequate respirators to ensure protection against site specific hazards in accordance with standards established by the U.S. Department of Interior, Bureau of Mines, and the U.S. Department of Agriculture. Employee selection of respirators shall be in accordance with the guidance of the American National Standard Practices for Respiratory Protection 788.2-1969. Respirator selection shall be coordinated with the DRMS Safety Manager.

6. Because of the dangers and potential for harmful exposures at third party sites, the TPPM shall use the buddy system at all times while working on-site. The buddy system requires that each employee of a work group is designated to be observed by at least one other person in the group. This system is designed to provide rapid assistance to an employee in the event of an emergency. A method of communications, i.e. visual, voice or signal line, shall be established and followed by the employees while on-site. In addition, proper rescue equipment shall be available to assist DRMS employees and site work crews in the event of an emergency.

7. Respiratory protection of the employee is no better than the respirator in use, even though it may be worn properly. Therefore, it is critical that the respirator be inspected regularly by a qualified individual and that it is properly cleaned and maintained. Before donning a respirator, DRMS employees shall be trained in fitting procedures and fit tested for face-piece to face seal.

SAFETY AND HEALTH PLAN (SHP)
 SITE CHECK LIST

DATE: _____
 PROJECT NAME: _____
 PROJECT NUMBER: _____
 FIELD LOCATION: _____

 PROJECT MANAGER: _____
 SITE HEALTH AND
 SAFETY COORDINATOR: _____

<u>SAFETY INFORMATION</u>	IN COMPLIANCE ?		
	REQUIRED	YES	NO
Signed SHP On Site/Available	_____	_____	_____
Safety and Health Signoff Form Completed for All On Site Personnel	_____	_____	_____
MSDSs On Site/Available	_____	_____	_____
Designated Site Safety Coordinator Present	_____	_____	_____
Site Safety Briefing Conducted	_____	_____	_____
Onsite Personnel Meet Safety and Health Requirements for Medical, Fit Test, And Training (including subcontractors)	_____	_____	_____
Equipment Specified Available And in Working Order	_____	_____	_____
Monitoring Equipment Calibrated and Calibration Records Available	_____	_____	_____
Exclusion Zone, Decontamination Zone, And Support Zone Enforced	_____	_____	_____
Decontamination Procedures in Place	_____	_____	_____

SAFETY INFORMATION

	IN COMPLIANCE ?		
	REQUIRED	YES	NO
Emergency Phone Numbers Posted	_____	_____	_____
Emergency Route to Hospital Noted	_____	_____	_____
Local Officials Notified	_____	_____	_____
Environmental/Personnel Monitoring Performed as Specified in SHP	_____	_____	_____
First Aid Available	_____	_____	_____

SAFETY EQUIPMENT UTILIZED BY FIELD CREW

	<u>PERSON #1</u>	<u>PERSON #2</u>	<u>PERSON #3</u>
1. Chemical Splash	_____	_____	_____
2. Safety Boots	_____	_____	_____
3. Goggles	_____	_____	_____
4. Gloves	_____	_____	_____
5. Boot Covers	_____	_____	_____
6. Hard Hat	_____	_____	_____
7. Respirator	_____	_____	_____
8. Explosimeter	_____	_____	_____
9. Organic Vapor Analyzer	_____	_____	_____
10. Decontamination Equipment and Supplies	_____	_____	_____
11. Other	_____	_____	_____

COMMENTS:

ENCLOSURE 2
CHAPTER IV
DRMS-I 6000.1

ON-SITE WORK ZONE

<SAMPLE>

DRMS SITE SAFETY AND HEALTH PLAN

A. INTRODUCTION.

This Site Safety and Health Plan (SSHP) has been developed for DRMS employees conducting DRMS third party program site investigations. The SSHP must be kept on site during work operations and shall address the safety and health hazards of each work task including requirements and procedures for employee protection.

This plan may be modified based on conditions unique to the hazardous waste site removal or clean up operation. Modifications to the SSHP must be approved by the DRMS Safety Manager.

_____ (name)_____ is the designated, on site, DRMS Site Safety Officer and is directly responsible for administration of safety procedures on site.

B. SITE DESCRIPTION.

Date _____

Site Name _____

Location _____

Hazards _____

Area impacted by contaminants _____

Population immediate area _____

Topography _____

Physical features _____

Weather conditions _____

Other Information _____

C. SITE BACKGROUND.

Describe the current land use and list owner(s) of site. Explain how DRMS got involved at site and what is requested of DRMS by regulatory agency or private party.

D. SITE INVESTIGATION.

Explain the purpose of entry to the contaminated area and specific information sought. Describe how entry will be conducted and tasks to be accomplished. Explain how conditions at site will be monitored i.e. air monitoring equipment, personnel monitoring equipment.

E. LIST OF KEY PERSONNEL.

Prepare a list of key personnel that will be involved in on-site activities:

DRMS Third Party Project Manager _____

Site Safety Officer _____

Regulatory Representative(s) _____

Private Citizen(s) _____

Other DRMS employees _____

Other DoD representatives _____

F. ON SITE CONTROL.

All on site personnel, when arriving or leaving the site, should log in and out with the site safety officer or site security officer.

(Name of individual or agency) has been designated to coordinate access and security on site. A safe perimeter has been established at (distance or description of controlled area):

No unauthorized person should be within this area.

The prevailing wind conditions are _____. The staging area is upwind from the exclusion zone.

Control boundaries have been established, and the exclusion zone has been identified and designated as follows:
(describe boundaries and/or attach map of controlled area) _____

These boundaries are identified by: (Marking of zones, red boundary tape-hotline, traffic cones-support zone etc.)

G. ON SITE WORK PLANS

Work party(s) consisting of _____ persons will perform the following tasks:

Project Team Leader	_____ (name) _____	_____ (function) _____
Work Party #1	_____	_____
	_____	_____
	_____	_____
Work Party #2	_____	_____
	_____	_____
	_____	_____

The work party(s) were briefed on the contents of this plan on (Date) at (Time).

H. HAZARD EVALUATION

The following substance(s) are known or suspected to be on site. The primary health hazards are identified below:

<u>Substances Involved</u>	<u>Concentrations (if known)</u>	<u>Hazards</u>
<u>(Chemical name)</u>	_____	_____
_____	_____	_____

The following additional hazards are expected on site: (i.e. slippery, uneven terrain, etc.)

Hazardous substance information forms for the involved substances have been completed and are attached i.e., MSDS, waste profile sheets, sample data.

I. PERSONAL PROTECTIVE EQUIPMENT

Based on the evaluation of potential hazards, the following levels of personal protection have been designated for the work areas or tasks to be performed on site. No changes to the specified levels of protection shall be made without the approval of the site safety officer. DRMS employees are required certificates of 40 hours of OSHA training and 8 hour refresher training to conduct on site investigations at uncontrolled hazardous waste sites.

<u>Location</u>	<u>Job Function</u>	<u>Level of Protection</u>
Exclusion zone	_____	C D other
	_____	C D other
	_____	C D other
	_____	C D other
Contamination	_____	C D other
Reduction zone	_____	C D other
	_____	C D other

Specific protective equipment for each level of protection is as follows:

Level C:	Splash gear (type)	Gloves, inner (surgical type)
	Full face respirator	Gloves, outer (chemical resistant)
	Safety boots	Disposal boot covers (chemical resistant)
	Hard hat	
	Chemical resistant clothing, Tyvek-polyethylene	
	Emergency escape respirator (optional)	

Level D: Hard hat (optional)
SCBA
Safety boots
Work gloves

Other _____

J. EMERGENCY PROCEDURES

1. Emergency Medical Care

_____ (names of qualified personnel) are qualified Emergency Medical Technicians (EMTs) on site.

_____ (medical facility names), at _____ (address), phone _____,

is located _____ minutes from this location.

_____ (name of person) was contacted at _____ (time) and briefed on the situation, the potential hazards, and the substances involved. A map of alternative routes to this facility is available to the SSHP.

Local ambulance services is available from _____ at phone _____ . Their response time is _____ minutes.

First aid equipment shall be available on site.

Emergency medical information for substances present:

<u>Substance</u>	<u>Exposure Symptoms</u>	<u>First Aid Instructions</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

List of emergency phone numbers:

<u>Agency/Facility</u>	<u>Phone #</u>	<u>Contact</u>
Police	_____	_____
Fire	_____	_____
Hospital	_____	_____
Airport	_____	_____
Public Health Advisor	_____	_____

2. Environmental Monitoring

The following environmental monitoring instruments shall be used on site (cross out if not applicable) at the specified intervals.

Oxygen Monitor	- continuous/hourly/daily/other	_____
HNU/OVA	- continuous/hourly/daily/other	_____
Other	- continuous/hourly/daily/other	_____

3. Emergency Response Actions

The following standard emergency procedures will be used by on site personnel. The site safety officer and regulatory agency shall be notified of any on site emergencies and be responsible for ensuring that the appropriate procedures are followed.

Personnel Injury in the Exclusion Zone: Upon notification of an injury in the exclusion zone, the designated emergency signal shall be used, i.e., hand signal, horn. All personnel on site shall assemble at the pre-designated area. Rescue personnel shall enter the exclusion zone (if required) to remove the injured person to the hotline. The site safety officer and regulatory official shall evaluate the nature of the injury, and the affected person should be removed to an area outside of the exclusion zone. On site personnel may initiate the appropriate first aid (if properly trained) and a request for ambulance or medical assistance sought as necessary. No person shall re-enter the exclusion zone until the cause of injury or symptoms is determined and resolved.

Personnel Injury in the Support Zone: Upon notification of an injury in the support zone, the site safety officer and regulatory official will assess the nature of the injury. If the cause of the injury or loss of the injured person does not affect the performance of the site investigation, operations may continue. If the injury increases the risk to others, the designated emergency signal shall be used and all site personnel shall move to a designated safe area for further instructions. Activities on site will stop until the problem is resolved.

Fire/Explosion: Upon notification of a fire or explosion on site, the designated emergency signal shall be used and all site personnel assembled at the designated area. The local fire and police departments shall be alerted and all personnel moved to a safe distance from the involved area.

Personal Protective Equipment Failure: If any site worker experiences a failure or alteration of personal protective equipment that affects the protection factor, that person and his/her buddy shall immediately leave the exclusion zone. Re-entry shall not be permitted until the equipment has been repaired or replaced.

Other Equipment Failure: If any other equipment on site fails to operate properly, the site safety officer shall be notified and a determination made of the effect of this failure on planned site operations. If the failure affects the safety of personnel or prevents completion of the work plan tasks, all personnel shall leave the exclusion zone until the situation is evaluated and appropriate actions taken.

The following emergency escape routes are designated for use in those situations where egress from the exclusion zone cannot occur through the support zone:
(describe alternate routes to leave area in emergencies)

In all situations, when an on site emergency results in evacuation of the exclusion zone, personnel shall not re-enter until:

- a. The conditions resulting in the emergency have been corrected.
- b. The hazards have been completely evaluated.
- c. The site safety plan has been reviewed and modified as necessary.
- d. Personnel on site have been briefed on any changes in the site safety plan.

4. Personal Monitoring

The following personal monitoring will be in effect on site:

Personal exposure sampling: (describe any personal sampling programs being carried out on site personnel. This would include use of HNU, air monitors, etc.)

K. SIGNATURES

All site personnel have read the above plan and are familiar with its provisions.

	(name)	(signature)
Site Safety Officer	_____	_____
Project Team Leader	_____	_____
DRMS TPPM	_____	_____
Regulatory Official	_____	_____
Other Personnel	_____	_____
	_____	_____
	_____	_____
	_____	_____
	_____	_____

L. REFERENCES

1. U.S. Coast Guard Policy Guidance for Response to Hazardous Chemical Release. USCG Pollution Response COMDTINST-M16465.30.
2. USCG Pollution Response COMDTINST-M164.65.30.
3. 29 CFR Part 1910.120(b).

M. COMMUNICATION PROCEDURES

If it is determined that DRMS employees shall operate radio equipment in the performance of the third party mission during simple retrieval or removal actions, the following procedures shall apply:

Channel _____ has been designated as the radio frequency for personnel in the exclusion zone. All other on site communications will use channel _____.

Personnel in the exclusion zone should remain in constant radio communication or within sight of the project team leader. Any failure of radio communication requires an evaluation of whether personnel should leave the exclusion zone.

(Horn blast, siren, etc.) _____ is the emergency signal to indicate that all personnel should leave the exclusion zone.

The following standard hand signals will be used in case of failure of radio communications:

Hand gripping throat ----- Out of air, can't breathe

Grip partner's wrist or ----- Leave area immediately
Both hands around waist

Hands on top of head ----- Need assistance

Thumbs up ----- OK, I am all right

Thumbs down ----- No, negative

Telephone communication to the command post should be established as soon as practicable. The phone number is _____.

N. DECONTAMINATION PROCEDURES

If it is determined that DRMS employee shall decontaminate work clothing for site investigations or simple retrieval actions, the following procedures shall apply.

Personnel and equipment leaving the exclusion zone shall be thoroughly decontaminated. The standard level (A, B, C, or D) decontamination protocol shall be used with the following decontamination stations:

(1) _____ (2) _____ (3) _____

(4) _____ (5) _____ (6) _____

(7) _____ (8) _____ (9) _____

(10) _____

Other _____

Emergency decontamination will include the following stations: _____

The following decontamination equipment is required: _____

Normally detergent and water will be used as the decontamination solution.

RESPIRATOR PROTECTION PROGRAM

A. INTRODUCTION. The objective of the Defense Reutilization and Marketing Service (DRMS) Respirator Protection Program (RPP) is to prevent harmful exposures to employees from those occupational diseases caused by breathing air contaminated with gases or aerosols. Respirators may be worn by DRMS employees to guard against possible exposures at uncontrolled hazardous waste sites.

B. PURPOSE AND SCOPE. The purpose of the RPP is to provide specific procedures for respirator selection, use, and maintenance by DRMS employees while working under conditions where harmful exposures may occur.

C. RESPONSIBILITIES.

1. The DRMS Safety Manager (DRMS-FH) shall appoint a Respirator Program Coordinator (RPC). The coordinator shall be responsible for:

- a. Providing appropriate respirators.
- b. Implementing training requirements.
- c. Administration of the overall respirator protection program.

2. DRMS supervisory personnel shall be responsible for the following:

- a. Ensuring that respirators are available as needed.
- b. Ensuring the employees wear respirators as required.
- c. Respirators are inspected on a regular schedule.
- d. Employees are trained in the proper use, care, and selection of respirators.
- e. Employees are medically fit to wear respirators.

3. The employee shall be responsible for the following:

- a. Using the respirator supplied to him/her in accordance with instructions and training.
- b. Cleaning, disinfecting, inspecting and storing his respirator properly.
- c. Reporting a respirator malfunction to his/her supervisor immediately so that corrective action can be taken by the RPC.
- d. Reporting any unusual exposures or suspected contamination.

4. The DRMS Safety Manager shall be responsible for the following:

a. Providing technical assistance to employees in the selection of respirator protection at hazardous waste operation and RCRA facilities.

b. Ensuring that periodic training in the maintenance, use, and selection of respirators is provided to employees.

c. Periodic evaluation of the DRMS respirator program.

d. Providing educational materials as part of the ongoing training of employees.

D. RESPIRATOR REQUIREMENTS.

1. Respirator requirements shall be determined by the on-site regulatory agency, the on-site safety officer and the RPC. The determination shall be based on the physical, chemical, and physiological properties of the air contaminant on the work site and on the concentration of potential exposures.

2. The quality of fit and the nature of the work being performed shall effect the selection of respirators. The capability of the respirator(s) selected shall be determined by the appropriate regulatory guidelines, and manufacturer's specifications.

E. DONNING OF RESPIRATORS AND RESTRICTIONS.

1. Air purifying respirators, except escape gas masks, should not be used in atmospheres containing less than 19.5 percent oxygen nor in atmospheres immediately dangerous to life or health (see enclosure 1). They shall not be used for protection against gases or vapors with poor warning properties, except as an emergency escape or where permitted by a regulatory agency. In this situation, the respirator must be equipped with an end of service life indicator for that particular substance.

2. Replacement schedules for respirators shall be followed based on reliable service-life data. DRMS employees shall replace cartridges after each use or if they detect odor of a substance during use (see enclosure 2).

3. If the wearer detects an odor or taste of gas through the absorbent material of the cartridge or feels eye or throat irritation, he must leave the hazardous work area immediately and go to a safe zone that contains respirable air.

4. Because of limited useful service time of cartridges, they should be replaced daily or anytime the wearer detects odor, taste or irritation.

F. DISTRIBUTION. Respirators will be purchased for employees as needed. DERA funds may be used to purchase Personal Protection Equipment (PPE) supplies. Each respirator will be individually assigned. Request for PPE and related supplies shall be submitted to the DRMS Safety Manager based on potential levels of exposure and PPE requirements.

G. MAINTENANCE. Respirators must be properly maintained to retain their original effectiveness in providing respiratory protection against harmful exposure to the employee. Maintenance shall include: regular inspection, repair, cleaning and proper storage.

H. INSPECTION.

1. All respirators must be inspected routinely by their user before and after each use, and after cleaning (see attachment 1, enclosure 4). Inspections shall include a check of the condition of the face piece, hand bands, valves, hoses, canisters, filters or cartridge fit.

2. The DRMS Third Party Project Manager (TPPM) shall inspect their assigned respirators at least once a month and more frequently as needed.

3. Any respirator equipment maintained for emergency use should be tagged accordingly, noting the date of inspection and the initials of the person performing the inspection (see attachment 2, enclosure 4). A record of inspection shall be maintained in the office of the RPC.

4. Respirators which do not pass inspections shall be replaced or repaired immediately. Repair of the respirator by the user is limited to changing canisters, cartridges, filters, and head straps.

5. All other replacements or repairs will be performed by the RPC. No attempt will be made to replace components, or make adjustments, modifications or repairs beyond the manufacturer's recommendation.

I. CLEANING.

1. Individually assigned respirators will be cleaned and disinfected as frequently as necessary to insure proper protection is provided to the user. Any respirators not individually assigned and those for emergency use must be cleaned and disinfected after each use.

2. The following procedures shall be used for cleaning and disinfecting respirators:

a. Filter, cartridges, or canisters shall be removed before washing the respirator and discarded as necessary.

b. Respirators should be washed in a luke warm detergent solution, rinsed in cool, clean water and allowed to dry in a clean area. A brush may be used to scrub loose dirt from the respirator.

J. STORAGE.

1. After inspection, cleaning, and any necessary repairs, respirators shall be stored to protect against atmospheric damage from dust, sunlight, heat, cold, excessive moisture, or damaging chemicals.

2. The respirator shall be stored in a plastic bag or its original carton and placed in a specially designated area i.e., cabinet or locker with other protective equipment.

3. The respirator must not be stored in a tool box or in an open area. Cartridges and canisters shall be stored in a plastic bag or in their original carton.

K. TRAINING.

1. Every TPPM who may be required to wear a respirator must be trained in the use, maintenance, care, and selection of respirators. The employee and his first line supervisor shall both receive this training. The training program should include the following:

- a. Description of respirators.
- b. Use and limitations of respirators.
- c. Proper wearing, fit checks and fit test (see enclosure 6).
- d. Review of storage and cleaning procedures.

2. Training shall be as often as necessary to ensure that employees remain familiar with the proper use of respirators. Eight-hour refresher training shall be provided to employees annually. The training program shall be evaluated annually by the RPC to determine its effectiveness and to ensure employees receive the required minimum training in compliance with OSHA standards.

3. Supervisors who manage the daily activities of DRMS employees who may be required to wear respirators, shall be knowledgeable of respirator use and respiratory protection practices. Supervisor training shall include the following program areas:

- a. Employee training requirements.
- b. Basic respiratory protection practices.
- c. Selection and use of respirators to protect each employee against respiratory hazards to which the employee may be exposed.
- d. The general requirements of the entire RPP.
- e. The OSHA requirements for use of respirators at hazardous waste sites.
- f. Appropriate environmental regulations such as CERCLA, TSCA, and OSHA.

4. The supervisor shall be responsible for ensuring the functioning of the program, including maintenance of equipment, issuance of respirators, control of their use, and evaluation of the program's effectiveness.

L. SPECIAL PROBLEMS.

1. Facial Hair: Facial hair, including beards, sideburns, moustaches, or a few days growth of stubble, will not be permitted on employees who are required to wear respirators that rely on a tight facepiece fit to achieve maximum protection. Facial hair between the wearer's skin and the sealing surfaces of the respirator will prevent a good seal. An employee shall not enter a contaminated work area without a good seal of the respirator facepiece to the face.

2. Eye Glasses: Ordinary eye glasses shall not be used with full facepiece respirators. Eye glasses with temple bars or straps that pass between the sealing surface of a full facepiece and the employee's face will prevent a good seal, and shall not be used. Special corrective lenses can be permanently mounted inside a full facepiece respirator and are available from most respirator manufacturers. To ensure good vision, comfort, and proper sealing of the facepiece, corrective lenses must be mounted by the employee as designated by the manufacturer.

3. Contact Lenses: Employees shall not, under any circumstances, wear contact lenses when wearing any type of respiratory device. With full facepieces, incoming air directed toward the eye can cause discomfort from dirt, lint, or other debris lodging between the contact lens and the pupil.

4. Facial Deformities: Facial deformities, such as scars, deep skin creases, prominent cheekbones, severe acne, and the lack of teeth or dentures, can prevent a respirator from sealing properly. Employees with any facial deformities will be allowed to wear a respirator only after passing a fit test.

5. Communications: Talking while wearing a respirator equipped with a facepiece can break the seal of the facepiece. Employees who must speak are cautioned to keep jaw movement to a minimum. When extensive communication is necessary within a contaminated area, it should be done with the help of special communicating equipment obtained from the manufacturer of the respirator.

6. Temperature Extremes: In low temperatures, respirator lenses can become fogged. Fogging can be prevented by coating the inner surface of the lens with an anti-fogging compound. Satisfactory vision can be provided at temperatures down to -30 o F by supplying a full facepiece with a nose cup that directs the warm, moist exhaled air through the exhalation valve without its touching the lens. High or low temperatures can make wearing a respirator uncomfortable. Under temperature extremes, supplied air respirators may be equipped with a vortex tube to either warm or cool the air supply as needed, if such a device has been approved for use with the respirator. Also, air supply systems may be purchased to heat or cool the air supplied to the respirator facepiece or air hood.

M. RECORDS:

1. The following records shall be maintained in the DRMS Safety Manager's office:

- a. The number and types of respirators in use.
- b. A record of employee training programs.
- c. Inspection and maintenance reports.
- d. Medical certification to wear respirator.

ATTACHMENT 1
ENCLOSURE 4
CHAPTER IV
DRMS-I 6000.1

<DRMS Form 1976 - SAMPLE>

ATTACHMENT 2
ENCLOSURE 4
CHAPTER IV
DRMS-I 6000.1

<DRMS Form 1975 - SAMPLE>

RESPIRATOR FITTING

1. MOST IMPORTANT POINT: The topic of respirator fitting only applies to respirators having TIGHT FITTING FACEPIECES.
2. RESPIRATOR FIT CHECKS:
 - a. Applies to all tight-fitting respirators.
 - b. 2 fit checks: positive and negative pressure.
 - c. Both checks must be performed before each use, and if the wearer questions the fit, during each use.
 - d. These checks are the wearer's way of assuring, on a daily basis, that there is an adequate seal of the facepiece to his/her face, thereby assuring optimum performance from the respirator.
3. RESPIRATOR FIT TESTS
 - a. Currently applies only to tight-fitting respirators which may be operated in a negative pressure mode.
 - b. Purpose: Size Selection.
 - c. 2 types of fit tests: Qualitative and Quantitative.
4. QUALITATIVE FIT TESTS:
 - a. Rely on wearer's subjective response to irritation, odor, and tastes.
 - b. Advantages: fast, no complicated equipment and easily performed in the field.
 - c. Disadvantages: since they rely on the wearer's subjective response, they are not entirely reliable.
 - d. 3 types of qualitative fit tests: Irritant Smoke Test, Banana Oil Test, and Taste Test.
5. QUANTITATIVE FIT TEST:
 - a. Facepiece leakage is quantified by the use of a detecting instrument and a test agent such as corn oil, di(2-ethylhexyl) sebacate (DEHS), polyethylene glycol 400 (PEG-400), and sodium chloride.

b. Advantages: numerical fit is derived, permanent documentation is produced, and test does not depend on subjective response.

c. Disadvantages: expensive, trained operators required, and inconvenient for field use.

6. RESPIRATOR FITTING GUIDELINES:

a. For all tight-fitting respirators, perform fit checks (1) before each use, and (2) during each use if the wearer questions the fit.

b. For tight-fitting respirators which may be operated in a negative pressure mode, comply with the qualitative/quantitative fit test requirements described in the applicable substance-specific OSHA standards:

- (1) Acrylonitrile, 29 CFR 1910.1045(h)(3)
- (2) Arsenic, 29 CFR 1910.1018(h)(3)
- (3) Asbestos, 29 CFR 1910.1001(g)
- (4) Formaldehyde, 29 CFR 1910.1048(g)(3)
- (5) Lead, 29 CFR 1910.1025(f)(3)

c. Comply with the qualitative/quantitative fit test requirements specified in the current ANSI Respirator Standard if the air contaminant of interest is not covered by one of the five standards listed above. If the air contaminant of interest is covered by one of the five standards listed above, but the ANSI Respirator Standard fit test requirements are more stringent, the more conservative course of action should be chosen and should comply with ANSI fit test requirements.

DEFINITIONS

Active Sites: Sites where DRMS is actively involved in a response action, records search, or negotiations with a Federal, state or local government agency to remedy site conditions.

Administrative Order on Consent (AO): A legal and enforceable agreement signed between EPA and potentially responsible parties (PRPs) in which the PRPs agree to perform or pay the cost of site cleanup. The agreement describes action to be taken at a site and may be subject to a public comment period. Unlike a consent decree, an administrative order on consent does not have to be approved by a judge. It is also known as a consent order.

Agency for Toxic Substances and Disease Registry (ATSDR): A federal public health agency created by Superfund legislation. ATSDR's mission is to prevent or mitigate adverse human health effects and diminished quality of life resulting from exposure to hazardous substances in the environment. The agency conducts activities in the following areas: public health assessments, health investigations, exposure and disease registry, emergency response, toxicological profiles, health education and applied research.

Administrative Record: A file which is maintained and contains all information used by the lead agency to make its decision on the selection of a response action under CERCLA. This file is to be available for public review. A duplicate file is held at HQ DRMS and by the appropriate regulatory agency.

Air Stripping: A treatment system that removes or "strips" volatile organic compounds from contaminated ground water or surface water by forcing an air stream through the water and causing the compounds to evaporate.

Aquifer: An underground rock formation composed of materials such as sand, soil, or gravel that can store and supply ground water to wells and springs. Most aquifers used in the United States are within the thousand feet of the surface.

Bioremediation: A treatment technology which uses bacteria or "bugs" which "eat" the contamination. Bacterial digestion reduces the contamination into less harmful chemicals. This technique is most commonly used for petroleum based contaminants.

Carcinogen: A substance that causes cancer.

Carbon Adsorption: A treatment system where contaminants are removed from ground water or surface water by forcing the water through tanks containing activated carbon, a specifically treated material that attracts the contamination.

Cleanup: Actions taken to deal with a release or threatened release of hazardous substances that could affect public health and/or the environment. The term "cleanup" is often used broadly to describe various response actions or phases of remedial responses, such as the RI/FS and site remediation.

Closed Sites: Sites where DRMS has completed a response action. It also includes sites where a record search has been conducted with negative results. No further action is anticipated.

Comment Period: A time period during which the public can review and comment on various documents pertaining to DRMS/EPA actions. For example, a comment period is provided when EPA proposes to add sites to the National Priority List. Also a 30-day comment period is held to allow community members to review and comment on a draft RI/FS.

Community Relations (CR): EPA or PRP Group program to inform and involve the public in the Superfund process and respond.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA): A Federal law passed in 1980 and modified in 1986 by the Superfund Amendments and Reauthorization Act, commonly known as SARA. These acts created a special tax that goes into a Trust Fund, commonly known as Superfund. Fund monies are used to investigate and cleanup abandoned or uncontrolled hazardous waste sites. Under the program, EPA can either:

- * Pay for site cleanup when parties responsible for the contamination cannot be located or are unwilling or unable to perform the work.
- * Take legal action to force parties responsible for site contamination to cleanup the site or pay back the federal government for the cost of cleanup.

Consent Degree (CD): A legal document, approved and issued by a judge, that formalizes an agreement reached between EPA and PRPs to perform all or part of the Superfund site cleanup. The consent decree describes actions that the PRPs are required to perform and is subject to public comment.

Contract Lab Program (CLP): Laboratories under contract to EPA which analyze soil, water, air, and waste samples taken from areas at or near Superfund sites.

Cost-Effective Alternative: The cleanup alternative selected for a Superfund site based on technical feasibility, permanence, reliability, and cost. EPA is not required to select the least expensive remedy. It requires that if there are several alternatives that deal effectively with the problems at the site, EPA must choose the remedy on the basis of permanence, reliability, and cost.

Cost Recovery: A legal process where PRPs can be required to reimburse the Federal Government for money spent on any cleanup action.

Decontamination: Removal of hazardous substances from on-site workers and equipment to prevent the occurrence of adverse health affects.

Defense Environmental Restoration Account Fund (DERA): Provides DRMS a method of payment for response cost for CERCLA sites at the Federal, state and local level of government.

Emergency Response: Response conducted by workers from outside the immediate release area or by other designated responders to an uncontrolled release of hazardous substances.

Enforcement: EPA or a state agency efforts, through legal action if necessary, to force PRPs to perform or pay for a Superfund site cleanup.

Environmental Response Team (ERT): EPA hazardous waste experts who provide 24-hour technical assistance to EPA Regional Offices and states during all types of emergencies involving releases of hazardous waste sites and spills of hazardous substances.

Explanation of Differences: After adoption of a final remedial action plan, if any action is taken which is significantly different than the final action plan, the lead agency must publish an explanation of significant differences and the reasons the changes were made.

Facility: Includes: (1) any building, structure, installation, equipment, pipe or pipeline, well, pit, pond, lagoon, impoundment, ditch, storage containers, motor vehicles, rolling stock, or aircraft, (2) any site or area where a hazardous substance has been deposited, stored, disposed of, placed or otherwise located. Does not include any consumer product in use.

Feasibility Study (FS): See RI/FS.

Ground Water: Water found underground that fills pores between materials such as sand, soil, or gravel. In aquifers, ground water occurs in sufficient quantities that it can be used for drinking water, irrigation, and other purposes.

Hazard Ranking System (HRS): A scoring system used to evaluate potential relative risks to public health and the environment from releases or threatened releases of hazardous substances. EPA and states use the HRS to calculate a site score, from 0 to 100, based on the actual or potential release of hazardous substances from a site through air, surface water, ground water or direct contact pathways to affect people. This score is the primary factor used to decide if a hazardous waste site should be placed on the National Priorities List.

Hazardous Substances: Any material that poses a threat to public health and/or the environment. Typical hazardous substances are materials that are toxic, corrosive, ignitable, explosive, or chemically reactive.

Hazardous Waste Operation: Any on-site operation conducted within the scope of this instruction.

Health Hazard: Chemicals or pathogens for which there is statistical evidence that acute or chronic health effects may occur in exposed employees. This term includes: carcinogens, toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, and agents which act upon the hematopoietic system, lungs, skin, eyes, or mucous membranes.

Hydrology: The science dealing with the properties, movement and effects of water on the earth's surface, in the soil, atmosphere and subsurface rocks.

Incineration: Burning of certain types of solid, liquid, or gaseous materials under controlled conditions to destroy hazardous waste.

Information Repository: A file containing current information, technical reports, and reference documents regarding a Superfund site. The information repository is usually located in a public building that is convenient for local residents, such as a public school, city hall, or library.

Inorganic: Composed of mineral materials, including elemental salts and metals such as iron, aluminum, mercury, and zinc.

In Situ Vitrification: A treatment technology in which electrical power is applied to four electrodes that move downward into soil, heating both the soils and buried waste to about 3,000 degrees Fahrenheit. Buried wastes and soils melt and later cool into a solid, glass-like product.

Leachate: A contaminated liquid resulting when water percolates or trickles through waste materials and collects components of those wastes. Leaching may occur at landfills and may result in hazardous substances entering soil, surface water, or ground water.

Monitoring Wells: Special wells drilled at specific locations on or off a hazardous waste site where water can be sampled at selected depths and studied to determine such things as the direction of ground water flow and the types and amounts of contaminants present.

National Oil and Hazardous Substances Contingency Plan (NCP): The Federal regulation that guides the Superfund program.

National Priorities List (NPL): EPA's list of the most serious uncontrolled or abandoned hazardous waste sites identified for possible long-term remedial response using money from the Trust Fund. The list is based primarily on the score a site received on the Hazard Ranking System (HRS). EPA is required to update the NPL at least once a year.

National Resource Trustees: Federal agencies designated by the President as trustees for land, fish, wildlife, biota, air, water, ground water, drinking water supplies, and other resources for which the U.S., state or local government owns or has statutory requirements to protect or manage. Natural Resource Trustees include: Secretary of Defense; Interior; Agriculture; Commerce; and Energy; a state trustee; and an Indian tribe representative when their resources are affected.

National Response Center (NRC): The center operated by the U.S. Coast Guard that receives and evaluates reports of oil and hazardous substances released into the environment and notifies the appropriate agency(s). The NRC can be contacted 24-hours a day, toll-free at (800) 424-8802.

National Response Team (NRT): Representatives of 12 federal agencies that coordinate federal responses to nationally significant pollution incidents and provide advice and technical assistance to the responding agency(s).

On-Scene Coordinator (OSC): The EPA Federal official who coordinates and directs Superfund removal actions.

Operable Unit: An action taken as one part of an overall site cleanup. For example, a carbon adsorption system could be installed to halt rapidly spreading ground water contaminants while a more comprehensive and long-term RI/FS is underway. A number of operable units can be used in the course of a site cleanup.

Operation and Maintenance (O&M): Activities conducted at a site after a response action occurs, to ensure that the remediation or containment system is functioning properly.

Organic: Composed of carbon, including materials such as solvents, oils, and pesticides which are not easily dissolved in water.

Parts Per Billion (ppb)/Part per Million (ppm): Units commonly used to express low concentrations of contaminants. For examples 1 ounce of trichlorethylene (TCE) in 1 million ounces of water is 1 ppm. 1 ounce of TCE in 1 billion ounces of water is 1 ppb. If one drop of TCE is mixed in a competition size swimming pool, the water will contain about 1 ppb of TCE.

Potentially Responsible Party (PRP): Any individual(s) or company(s) such as owners, operators, transporters, or generators potentially responsible for or contributing to the contamination problems at a Superfund site. Whenever possible EPA requires PRPs through administrative or legal actions to cleanup hazardous waste sites.

Proposed Plan: A public participation requirement of SARA in which EPA summarizes for the public the preferred cleanup alternative, the rationale for the preference, and reviews alternatives presented in the RI/FS. The plan must actively solicit public review and comment on all alternatives under consideration by the agency.

Preliminary Assessment (PA): The process of collecting and reviewing available information about a known or suspected hazardous waste site or release. EPA or states use this information to determine if the site requires further study. If further study is needed, a site inspection is conducted.

Quality Assurance/Quality Control (QA/QC): A system of procedures, checks, audits, and corrective actions used to ensure that field work and laboratory analysis during the investigation and cleanup of Superfund sites meet established standards.

Record of Decision (ROD): A public document that explains which cleanup alternative(s) will be used at a Superfund site. The ROD is based on information and technical analysis generated during the RI/FS study and consideration of public comments. The term is also used within DRMS to document its decision making process for participation at a third party site.

Regional Response Team (RRT): Representatives of Federal, state, and local agencies who may assist in coordination of activities at the request of the On-Scene Coordinator or Remedial Project Manager before and during response actions.

Remedial Action (RA): The actual construction or implementation phase that follows the remedial design of the selected cleanup at a Superfund site. Action taken to provide a permanent remedy at the site.

Remedial Design (RD): An engineering phase that follows the ROD. Technical drawings and specifications are developed for the subsequent remedial action at a Superfund site.

Remedial Investigation/Feasibility Study (RI/FS): Two distinct but related studies. They are usually performed at the same time and referred to as the RI/FS. They are intended to:

- * Gather the data necessary to determine the type and extent of contamination at a Superfund site;
- * Establish criteria for cleaning up the site;
- * Identify and screen cleanup alternatives for remedial action; and
- * Analyze in detail the technology and costs of the alternatives.

Remedial Project Manager (RPM): The EPA or state official responsible for overseeing the Superfund project.

Remedial Response: A long-term action that stops or substantially reduces a release or threatened release of hazardous substances that is serious, but does not pose an immediate threat to public health and/or the environment. It is commonly called "the cleanup".

Removal Action: An immediate action taken over the short-term to address a release or threatened release of hazardous substances.

Resource Conservation and Recovery Act (RCRA): A Federal law that established a regulatory system to track hazardous substances from the time of generation to disposal. The law required safe and secure procedures be used in treating, transporting, storing, and disposing of hazardous substances. RCRA is designed to prevent new, uncontrolled hazardous waste sites.

Response Action: A CERCLA-authorized action at a Superfund site involving either a short-term remedial response that may include, but is not limited to the following activities:

- * Removing hazardous substances from a site to an EPA approved, licensed hazardous waste facility for treatment, containment, or destruction.
- * Containing the waste safely on-site to eliminate further problems.
- * Destroying or treating the waste on-site using incineration or other technologies.
- * Identifying and removing the source of ground water contamination and halting further movement of the contaminants.

Responsiveness Summary: A summary of oral and/or written public comments received by EPA during a comment period on key EPA documents, and EPA's responses to those comments. The responsiveness summary is especially valuable during the decision phase of a Superfund site as it highlights community concerns for decision-makers.

Risk Assessment: An evaluation performed as part of the remedial investigation to assess conditions at a Superfund site and determine the risk posed to public health and/or the environment.

Site Inspection (SI): A technical phase that follows a preliminary assessment designed to collect more extensive information on a hazardous waste site. The information is used to score the site with the Hazard Ranking system to determine whether response action is needed.

Site Safety and Health Supervisor: The on-site employee who is responsible for the safety of work crews and has the authority to plan and ensure compliance with applicable safety and health regulations.

Stabilization: An action taken to prevent further migration or threat from contamination. Activities could include containment or removal of the containment.

Superfund: The common name used for the Comprehensive Environmental Response, Compensation, and Liability Act, also referred to as the Trust Fund.

Superfund Amendments and Reauthorization Act (SARA): Modifications to CERCLA enacted by Congress on October 17, 1986.

Surface Water: Bodies of water that are above ground, such as rivers, lakes, and streams.

Technical Assistance Grants: A reimbursement grant program for local citizen groups who are affected by a Superfund site. The grant monies allow the group to hire a technical advisor to assist them in understanding and commenting on technical documents associated with the site.

Third Party Site: A generic term, refers to DRMS involvement in a response action at a uncontrolled hazardous waste site with two other parties including a governmental body whether Federal, state, local or other and a private party. Private parties may include owners, operators of hazardous waste treatment, storage or disposal facility regulated by 40 CFR Part 264 and 265, and buyers of surplus DoD property.

Time Critical Removals: Including emergencies lasting longer than 30 days, those releases requiring initiation of on-site activity within 6 months of the determination that a removal action is necessary. DRMS uses the USACE Rapid Response Program for actions which require an immediate response.

Treatment, Storage, and Disposal Facility (TSD facility): Any building, structure, or installation where a hazardous substance has been treated, stored, or disposed. TSD facilities are regulated by EPA and states under RCRA.

Trust Fund: A fund set up under the Comprehensive Environmental Response, Compensation, and Liability Act to help pay for cleanup of hazardous waste sites or pay legal cost to force responsible parties to clean up site.

Volatile Organic Compound (VOC): An organic (carbon-containing) compound that evaporates (volatilizes) readily at room temperature.

Water Purveyor: A public utility, mutual water company, county water district, or municipality that delivers drinking water to customers.

NIOSH, OSHA, AND EPA REGIONAL OFFICES
AND USCG DISTRICT OFFICES

NIOSH REGIONAL OFFICES

HHS Region I
Government Center
(JFK Federal Building)
Boston, MA 02203
Telephone: 617-223-3848

HHS Region III
521-35 Market Street
P.O. Box 13716
Philadelphia, PA 19101
Telephone: 215-596-6716

HHS Region V
300 South Wacker Drive
33rd Floor
Chicago, IL 60606
Telephone: 312-886-3881

HHS Region VII
601 East 12th Street
Kansas City, MO 64106
Telephone: 816-374-3491

HHS Region IX
50 United Nations Plaza
San Francisco, CA 94102
Telephone: 415-556-3782

OSHA REGIONAL OFFICES

OSHA Region I
16-18 North Street
1 Dock Square Building 4th flr
Boston, MA 02109
Telephone: 617-223-6710

OSHA Region III
Gateway Building, Suite 2100
3535 Market Street
Philadelphia, PA 19104
Telephone: 215-596-1201

HHS Region II
26 Federal Plaza, Room 3337
New York, NY 10278
Telephone: 212-264-5747

HHS Region IV
101 Marieta Tower, Suite 1007
Atlanta, GA 30323
Telephone: 404-221-2396

HHS Region VI
1200 Main Tower Building
Room 1835
Dallas, TX 75202
Telephone: 214-767-3916

HHS Region VIII
1185 Federal Building
1961 Stout Street
Denver, CO 80294
Telephone: 303-844-6163 x17

HHS Region X
2901 Third Avenue, M.S. 402
Seattle, WA 98121
Telephone: 206-442-0530

OSHA Region II
One Astro Plaza, Room 3445
1515 Broadway
New York, NY 10036
Telephone: 212-944-3432

OSHA Region IV
1375 Peachtree Street, N.W.
Suite 587
Atlanta, GA 30367
Telephone: 404-881-3573

OSHA Region V
230 South Dearborn Street
32nd floor, Room 3244
Chicago, IL 60604
Telephone: 312-353-2220

OSHA Region VII
911 Walnut Street, Room 406
Kansas City, MO 64106
Telephone: 816-374-5861

OSHA Region IX
450 Golden Gate Avenue
Box 36017
San Francisco, CA 94102
Telephone: 415-556-7260

EPA REGIONAL OFFICES

EPA Region I
JFK Federal Building
Boston, MA 02203
Telephone: 617-223-7210

EPA Region III
841 Chestnut Street
Philadelphia, PA 19107
Telephone: 215-597-9800

EPA Region V
230 S. Dearborn Street
Chicago, IL 60604
Telephone: 312-353-2000

EPA Region VII
726 Minnesota Avenue
Kansas City, KS 66101
Telephone: 913-236-2800

EPA Region IX
215 Fremont Street
San Francisco, CA 94105
Telephone: 415-974-8153

OSHA Region VI
525 Griffin Square, Room 602
Dallas, TX 75202
Telephone: 214-767-4731

OSHA Region VIII
Federal Building, Room 1554
1961 Stout Street
Denver, CO 80294
Telephone: 303-837-3061

OSHA Region X
Federal Office Building
Room 6003
909 First Avenue
Seattle, WA 98174
Telephone: 206-442-5930

EPA Region II
26 Federal Plaza
Room 900
New York, NY 10218
Telephone: 212-264-2525

EPA Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365
Telephone: 404-881-4727

EPA Region VI
First International Building
1201 Elm Street
Dallas, TX 75270
Telephone: 214-767-2600

EPA Region VIII
One Denver Place
999 18th Street, Suite 1300
Denver, CO 80202-2413
Telephone: 303-293-1603

EPA Region X
1200 6th Avenue
Seattle, WA 98101
Telephone: 206-442-5810