

NAVY DEVELOPS HAZWOPER CHECKLIST TO PROTECT HAZARDOUS WASTE SITE WORKERS

Protecting the health and safety of workers is a major consideration during hazardous waste site remediation, or cleanup.

Hazardous waste cleanup sites must be properly managed to ensure they do not harm populations now and well into the future.



Workers wearing air-purifying respirators (air exposures are known to be minimal) take soil samples.

The Occupational Safety and Health Administration (OSHA) developed the Hazardous Waste and Emergency Response (HAZWOPER) standard to protect workers cleaning up hazardous waste sites from known and

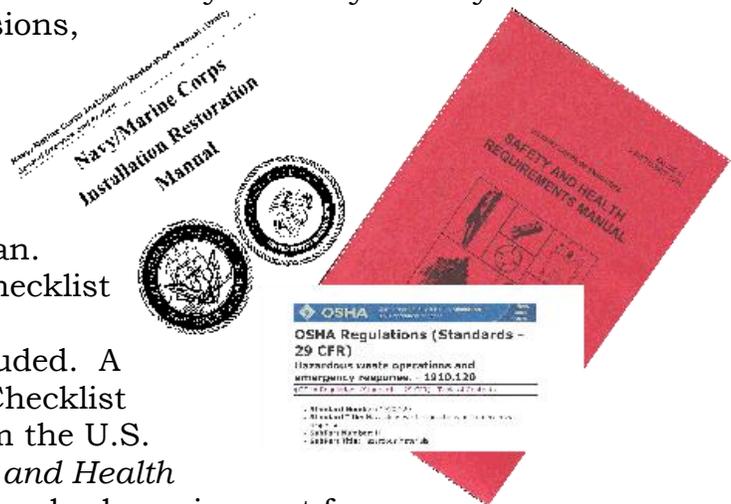
suspected hazards at those locations. The standard is found in OSHA's General Industry Standards at 29 CFR 1910.120 and repeated in the OSHA Construction Standards at 29 CFR 1926.65. The HAZWOPER standard requires site managers to develop a *site-specific health and safety plan (HASP)* to address all anticipated health and safety hazards and to include methods for employee protection. At a minimum, each HASP must address the following on a site-specific basis:

- Hazard analysis for each site task and operation
- Personal protective equipment (PPE)
- Training on site hazards
- Medical surveillance
- Site control measures
- Air monitoring
- Information on key personnel and alternates responsible for site safety and health
- Decontamination
- Emergency response
- Confined space entry
- Spill containment

The Navy/Marine Corps' Installation Restoration Manual reinforces and amplifies OSHA's HAZWOPER standard for protecting workers at hazardous waste sites. The manual requires that the Navy Restoration Project Manager in charge of each clean up project review the HASP to ensure that health and safety concerns are adequately addressed. The

Navy Environmental Health Center's Environmental Programs Directorate (NEHC-EP) supports the Restoration Project Managers and others (e.g., safety and health managers, base installation restoration managers, and contract specialists) by providing a comprehensive and consistent review of these site-specific health and safety plans (HASPs) from an occupational health perspective. NEHC-EP reviews these plans to make sure regulatory requirements are addressed and that all risk factors are adequately identified and controlled. To date, NEHC-EP has reviewed nearly 500 HASPs.

To assist in writing and reviewing HASPs and to improve HASP quality, NEHC-EP developed a *Site-Specific Health and Safety Plan Review Checklist*. The Checklist is incorporated into the Navy/Marine Corps Installation Restoration Manual and is used by the Navy Facility Engineering Command field divisions, which are responsible for the Navy/Marine Corps hazardous waste site clean up program. The Checklist includes citations for items required for a site-specific health and safety plan. NEHC reviews and updates its checklist periodically to ensure all current regulatory requirements are included. A recently updated version of the Checklist includes applicable citations from the U.S. Army Corps of Engineers' *Safety and Health Requirements Manual* that is a standard requirement for most military construction work.



To facilitate dissemination, the Checklist is posted on the NEHC website at: http://www.med.navy.mil/sites/nmcpnc/Documents/environmental-programs/health-and-safety/hasp_checklist_jan2010.pdf. The availability of the Checklist on the website provides contractors with an easily accessible tool to assist them in drafting health and safety plans that meet regulatory agency requirements. Over the years, NEHC-EP has found that contractor-developed health and safety plans have dramatically improved in quality resulting in significantly less rewrite. Less rewrite means reduced cost – so using the Checklist can easily lead to better, cheaper, faster, and safer plans. Everyone wins. Most importantly, management of site hazards in compliance with OSHA and Navy requirements can reduce the numbers and severity of mishaps and injuries. By sharing the *Site-Specific Health and Safety Plan Review Checklist* as a NAVOSH Success Story, NEHC-EP hopes to see it used as a tool to protect workers on hazardous waste clean up projects outside the Navy as well.