



The Accident Prevention Plan: Your “Best Friend” for Ensuring Health and Safety Compliance at Environmental Restoration Sites

Robert Hayes, MS, CIH
Environmental Programs Department
Navy and Marine Corps Public Health Center

Ryan MacLure, PE
Remedial Project Manager
NAVFAC SW

Disclaimer



- **This webinar is intended to be informational and does not indicate endorsement of a particular product(s) or technology by the Department of Defense or NAVFAC EXWC, nor should the presentation be construed as reflecting the official policy or position of any of those Agencies. Mention of specific product names, vendors or source of information, trademarks, or manufacturers is for informational purposes only and does not constitute an endorsement or recommendation by the Department of Defense or NAVFAC EXWC. Although every attempt is made to provide reliable and accurate information, there is no warranty or representation as to the accuracy, adequacy, efficiency, or applicability of any product or technology discussed or mentioned during the seminar, including the suitability of any product or technology for a particular purpose.**

• Why Attend?

- Obtain and hear about the latest DOD and DON's policies/guidance, tools, technologies and practices to improve the ERP's efficiency
- Promote innovation and share lessons learned
- **FEEDBACK** to the ERP Leadership

• Who Should Attend?

- ERP Community Members: RPMs, RTMs, Contractors, and other remediation practitioners who support and execute the ERP
- Voluntary participation

• Schedule and Registration:

- Offered quarterly
- Registration link for each topic (announced via ER T2 email)

• Topics and Presenters:

- **ERP community members** to submit topics (non-marketing and DON ERP-relevant) to POCs (Kim Brown – kim.p.brown4.civ@us.navy.mil or EXWC_T2@navy.mil)
- Selected topic will be assigned Champion to work with presenter

Course Outline



- **EM 385-1-1: What is it and why do we use it**
- **Accident Prevention Plan (APP) and Activity Hazard Analysis (AHA) application, structure and content. Does OSHA apply?**
- **Contractual and Work Plan Requirements**
- **APP/Site Safety and Health Plan (SSHP)/Abbreviated APP**
- **Roles/Responsibilities and Technical Support**
- **Other “Players” and Unique Situations**
- **Knowledge Checks Throughout**
- **Final Thoughts and Links**

EM 385-1-1 Application: The APP and Environmental Restoration Projects



- EM 385-1-1: What is it and why do we use it?
- What about OPNAVINST 5100.23 series?
- EM 385-1-1: 34 “Sections”
- Accident Prevention Plan (APP):
 - “Centerpiece” of EM 385-1-1
 - The required project (site) specific H&S document that defines the contractor’s safety approach (Section 01 and Appendix A)
 - Must be government reviewed and approved
 - 61 plans that required applicability determination



APP: 61 H&S Plans to Consider



Fatigue Management (01.A.20)	Asbestos Abatement (06.C.03)	Hazardous Energy (12.A.01)	Formwork/Shoring (27.C)
Emergency(01.E)	Radiation Safety (06.F)	LHE-Pre-Lift (16.A.03)	Pre-Cast Concrete (27.D)
Site Sanitation/Housekeeping (02.B)	Abrasive Blasting (06.1.01)	LHE-Critical Lift (16.H)	Lift-Slab (27.E)
Medical Support Agreement (03.A)	Heat Stress Monitoring (06.J.02)	LHE-Floating (16.L)	Masonry Bracing (27.F.01)
Blood-borne Pathogens (03.A.05)	Cold Stress Monitoring (06.J.04)	Floating Plant (19.A.01)	Steel Erection (28.B)
Exposure Control (03.A.05)	Indoor Air Quality (06.L)	Severe Weather (19.A.03)	Explosives Safety (29.A)
AED (03.B.04)	Mold Remediation (06.L)	Marine Emergency (19.A.04)	Blasting (29.A; 26.J)
Site Layout (04.A)	Chromium VI Exp (06.M)	Man Overboard/Abandon Ship (19.A.04)	Dive Ops (30.A.14; 30.A.16)
Access/Haul Road (04.B)	Crystalline Silica (06.N.02)	Float Plan (19.F.04)	Dive Safe Practices (30.A.15)
Hearing Conservation (05.C)	Lighting:Night Ops ((07.A.06)	Fall Protection (21.D)	Dive Emergency (30.A.18)
Respiratory Protection (05.G)	Traffic Control (08.C.05)	Demo/Renovation (23.A)	Tree Felling (31.A.01)
Health Hazard Control (06.A)	Fire Prevention (09.A.01)	Rope Access (24.H)	Aircraft/Airfield Safety- 2 Plans (32.A.02)
Hazard Communication (06.B.01)	Wildland Fire Mgmt (09.L)	Excavation/Trench (25.A.01)	SSHP (33.B)
Process Safety (06.B.04)	Arc Flash Hazards (11.B)	U/G Fire Prevention (26.D.01)	Confined Space – 2 Plans (34.A.05; 34.A.06)
Lead Compliance (06.C.02)	AEGCP-Grounding (11.D.E)	U/G Compressed Air (26.I.01)	

USACE Form A-02: APP Checklist



Form A-02 U.S. Army Corps of Engineers Accident Prevention Plan Checklist				Date of Inspection
Location (Plant or Facility)		Contract Number		
Contractor Name		Project Name		
Inspector Name (Print)		Inspector Signature		
<i>This checklist serves as a guide only, it does not replace or eliminate the need to comply with the requirements set forth in Engineering Manual 385-1-1, Safety and Health Requirements Manual, dated 30 Nov 2014. The references included in this checklist correspond to the applicable sections of EM 385-1-1.</i>				
Item Description	Yes	No	N/A	Remarks (Any NO or N/A item)
a. Signature sheet				
1. Includes the name, title, signature, telephone number, and qualifications of the Plan Preparer (Qualified person, i.e. corporate safety staff person, QC)				
2. Includes the name, title, signature, telephone number, and qualifications of the Plan Approver (e.g. owner, company president, regional vice president) (HTRW activities require approval of a Certified Industrial Hygienist, a Certified Safety Professional may approve the plan for operations involving UST removal where contaminants are known to be petroleum, oils, or lubricants).				
3. Includes the name(s), title(s), signature(s), telephone number(s), and qualifications for Plan Concurrence (provide concurrence of other applicable corporate and project personnel (contractor)) (e.g. Chief of Operations, Corporate Chief of Safety, Corporate Industrial Hygienist, project manager or superintendent, project safety professional, project QC.)				
b. Background information				
1. Includes the Contractor Name.				
2. Includes the Contract Number.				
3. Includes the Project Name.				
4a. Includes the Brief Project Description.				
4b. Includes a Description of the Work to be Performed.				
4c. Includes the Location of the Project (map).				
4d. Includes the Equipment to be Used.				
4e. Includes the Anticipated High Risk Activities.				
5. Includes the Major Phases of Work Anticipated. (Within these major phases of work identified, activities [includes Definable features of Work (DFOWs) and tasks] to be performed that will require an AHA shall be specifically highlighted. This information can then be used by QC, QA and Safety personnel to track AHA submittals. The AHAs for these activities, tasks of DFOWs are NOT submitted at this time (AHAs created/submitted at this time would not be activity-specific as they are intended to be). > See Sections 01.A.14 and 01.A.15.)				

Activity Hazard Analysis (AHA): Risk Assessment of Task Hazards



- Identify the Definable Features of Work (DFOWs).
- For each DFOW there needs to be an AHA.
- AHA represents the contractor's risk management process for the project tasks to be performed.
- An appropriate Risk Assessment Code (RAC) is assigned.
- DFOWs and AHAs are required for each project.
- AHA development guidance: Section 01 and Appendix A of EM385-1-1
- Format is flexible; content is not

Typical AHA Format and Content



Activity/Work Task #1: Mobilization, Site Setup	Overall Risk Assessment Code (RAC) (Use highest code)					M
Project Location: WE37 NIROP Fridley	Risk Assessment Code (RAC) Matrix					
Contract Number: N62470-13-D-8007	Severity		Probability			
Date Prepared: August 6, 2022			Frequent	Likely	Occasional	Seldom
Prepared by: Joe Safety, CSP, Safety and Health Manager	Catastrophic	E	E	H	H	M
Reviewed by: Iam Safeguy, CIH, CSP, CHMM, Safety and Health Manager (SHM);	Critical	E	H	H	M	L
<p>Notes: (Field Notes, Review Comments, etc.)</p> <p>In addition to the information listed in this AHA, all field personnel must review and be familiar with all provisions of the approved Accident Prevention Plan (APP). US Army Corp of Engineers (USACE) Safety and Health Requirements Manual, EM 385-1-1, will also be available on-site for review of specific materials and mitigation measures.</p> <p>Personal Protective Equipment (PPE) for this AHA will consist of hard hat (when overhead safety hazards exist), safety toed boots, safety glasses with side shields, standard work uniform (long pants, ¾ length sleeve shirt). Hearing protection (as required). Work gloves worn when indicated, High visibility safety vest.</p> <p>Project Site Safety and Health Officer (SSHO) and Excavation Competent Person: I. M. Expert</p> <p>First Aid/ Cardio Pulmonary Resuscitation (CPR) Qualified Persons: TBD</p>	Marginal	H	M	M	L	L
	Negligible	M	L	L	L	L
		Step 1: Review each “Hazard” with identified safety “Controls” and determine RAC (see above).				
<p>“Probability” is the likelihood to cause an incident, near miss, or accident and is identified as Frequent, Likely, Occasional, Seldom, or Unlikely.</p>					RAC Chart	
<p>“Severity” is the outcome/degree if an incident, near miss, or accident did occur and is identified as Catastrophic, Critical, Marginal, or Negligible.</p>					E = Extremely High Risk	
					H = High Risk	
					M = Moderate Risk	
<p>Step 2: Identify the RAC (Probability/Severity) as E, H, M, or L for each “Hazard” on the AHA. Annotate the overall highest RAC at the top of the AHA.</p>					L = Low Risk	

Typical AHA Format and Content (cont'd)



AHA #1 – Job/Task: Mobilization and Site Setup/Demobilization and Restoration			
Job Steps	Hazards	Controls	RAC
Mobilization and Site Setup			
Job Step 1			
Job Step 2			
Job Step 3			
Job Step 4 etc.			
Equipment to be Used	Training Requirements/Competent or Qualified Personnel	Inspection Requirements	

EM 385-1-1 vs. OSHA



- **What about OSHA? Navy/DoD sites are federal entities; why not just follow OSHA requirements?**
- **OSHA standards do little to address safety management; no APP equivalent requirement (stand-alone regulations).**
- **EM 385-1-1 concentrates on safety management in great detail:**
 - **Accident Prevention Plan with project-specific H&S plans and procedures (required) – *Not static***
 - **Activity Hazard Analyses (required) - *Not static***

Knowledge Check: EM 385-1-1 Application



Scenario: A 10 foot wide by 7 foot deep trench is required to conduct subsurface sampling and remove contaminated soils.

Questions:

- 1. Is an Excavation Plan required? If not, why not? If yes, is it required by EM 385-1-1 or OSHA or both?**
- 2. If an excavation plan is required, should it be considered its own health and safety document or part of the project APP?**

Knowledge Check (cont'd):



Questions (cont'd):

3. Other than the Excavation Plan, what other plans and procedures might be required by the APP?

4. What are some possible DFOWs for this work that would require AHA development?

APP: 61 H&S Plans to Consider



Fatigue Management (01.A.20)	Asbestos Abatement (06.C.03)	Hazardous Energy (12.A.01)	Formwork/Shoring (27.C)
Emergency(01.E)	Radiation Safety (06.F)	LHE-Pre-Lift (16.A.03)	Pre-Cast Concrete (27.D)
Site Sanitation/Housekeeping (02.B)	Abrasive Blasting (06.1.01)	LHE-Critical Lift (16.H)	Lift-Slab (27.E)
Medical Support Agreement (03.A)	Heat Stress Monitoring (06.J.02)	LHE-Floating (16.L)	Masonry Bracing (27.F.01)
Blood-borne Pathogens (03.A.05)	Cold Stress Monitoring (06.J.04)	Floating Plant (19.A.01)	Steel Erection (28.B)
Exposure Control (03.A.05)	Indoor Air Quality (06.L)	Severe Weather (19.A.03)	Explosives Safety (29.A)
AED (03.B.04)	Mold Remediation (06.L)	Marine Emergency (19.A.04)	Blasting (29.A; 26.J)
Site Layout (04.A)	Chromium VI Exp (06.M)	Man Overboard/Abandon Ship (19.A.04)	Dive Ops (30.A.14; 30.A.16)
Access/Haul Road (04.B)	Crystalline Silica (06.N.02)	Float Plan (19.F.04)	Dive Safe Practices (30.A.15)
Hearing Conservation (05.C)	Lighting:Night Ops ((07.A.06)	Fall Protection (21.D)	Dive Emergency (30.A.18)
Respiratory Protection (05.G)	Traffic Control (08.C.05)	Demo/Renovation (23.A)	Tree Felling (31.A.01)
Health Hazard Control (06.A)	Fire Prevention (09.A.01)	Rope Access (24.H)	Aircraft/Airfield Safety- 2 Plans (32.A.02)
Hazard Communication (06.B.01)	Wildland Fire Mgmt (09.L)	Excavation/Trench (25.A.01)	SSHP (33.B)
Process Safety (06.B.04)	Arc Flash Hazards (11.B)	U/G Fire Prevention (26.D.01)	Confined Space – 2 Plans (34.A.05; 34.A.06)
Lead Compliance (06.C.02)	AEGCP-Grounding (11.D.E)	U/G Compressed Air (26.I.01)	

RPM/COR Responsibilities



- **RPM/COR has final approval authority of APP/SSHP, not NMCPHC**
- **APP/SSHP should be prepared in tandem with SAP or Work Plan**
- **RPM/COR should assume ownership of APP/SSHP and ensure any work plan deviations are addressed in the APP/SSHP.**

Example Deliverable Schedule



1	CTO 4508 Notice to Proceed	0 days	6/3/22	6/3/22
2	PFAS Remedial Investigation UFP-SAP	394 days	6/4/22	7/2/23
3	Preliminary Draft SAP Preparation	150 days	6/4/22	10/31/22
4	Preliminary Draft SAP Review	112 days	11/1/22	2/20/23
5	QAO Review	30 days	11/1/22	11/30/22
6	RTC and Red-Line Review	15 days	12/1/22	12/15/22
7	QAO Draft Preparation	7 days	12/16/22	12/22/22
8	QAO Review	30 days	12/23/22	1/21/23
9	QAO RTC and Red-Line Preparation	15 days	1/22/23	2/5/23
10	QAO Red-Line Review	5 days	2/6/23	2/10/23
11	Prepare Draft SAP	10 days	2/11/23	2/20/23
12	Draft SAP Review	81 days	2/21/23	5/12/23
13	DTSC and Water Board Review	60 days	2/21/23	4/21/23
14	RTC/Prepare Draft Final	21 days	4/22/23	5/12/23
15	Draft Final SAP Review	51 days	5/13/23	7/2/23
16	NAFVAC, DTSC, Water Board Review	30 days	5/13/23	6/11/23
17	Comment Resolution/Prepare Final	21 days	6/12/23	7/2/23
18	Final SAP Submission	0 days	7/2/23	7/2/23
19	PFAS Remedial Investigation APP/SSHP	150 days	6/4/22	10/31/22
20	Draft APP/SSHP Preparation	90 days	6/4/22	9/1/22
21	NAVFAC Review	30 days	9/2/22	10/1/22
22	Comment Resolution/Prepare Final	30 days	10/2/22	10/31/22
23	Final APP/SSHP Submission	0 days	10/31/22	10/31/22

APP is reviewed 2 months before QAO review of SAP

Preferred Deliverable Schedule



1	NBSD PFAS Remedial Integration	1096 days	6/3/22	6/2/25
2	CTO 4508 Notice to Proceed	0 days	6/3/22	6/3/22
3	PFAS Remedial Investigation UFP-SAP	394 days	6/4/22	7/2/23
4	Preliminary Draft SAP Preparation	150 days	6/4/22	10/31/22
5	Preliminary Draft SAP Review	112 days	11/1/22	2/20/23
6	QAO Review	30 days	11/1/22	11/30/22
7	RTC and Red-Line Review	15 days	12/1/22	12/15/22
8	QAO Draft Preparation	7 days	12/16/22	12/22/22
9	QAO Review	30 days	12/23/22	1/21/23
10	QAO RTC and Red-Line Preparation	15 days	1/22/23	2/5/23
11	QAO Red-Line Review	5 days	2/6/23	2/10/23
12	Prepare Draft SAP	10 days	2/11/23	2/20/23
13	Draft SAP Review	81 days	2/21/23	5/12/23
14	DTSC and Water Board Review	60 days	2/21/23	4/21/23
15	RTC/Prepare Draft Final	21 days	4/22/23	5/12/23
16	Draft Final SAP Review	51 days	5/13/23	7/2/23
17	NAFVAC, DTSC, Water Board Review	30 days	5/13/23	6/11/23
18	Comment Resolution/Prepare Final	21 days	6/12/23	7/2/23
19	Final SAP Submission	0 days	7/2/23	7/2/23
20	PFAS Remedial Investigation APP/SSHP	210 days	6/4/22	12/30/22
21	Draft APP/SSHP Preparation	150 days	6/4/22	10/31/22
22	NAVFAC Review	30 days	11/1/22	11/30/22
23	Comment Resolution/Prepare Final	30 days	12/1/22	12/30/22
24	Final APP/SSHP Submission	0 days	12/30/22	12/30/22

Prepared Concurrently

Advantages of Concurrently preparing APP/SSHP and SAP/Work Plans



- **Any changes to fieldwork activities based on changes to work plans can be captured in the APP/SSHP reviewed by the NMCPHC.**
 - Including TBDs diminishes NMCPHC's review
- **Preparing APP/SSHP after subcontractors are selected allows for the preparation of more accurate AHAs.**

SOW/PWS Example Language

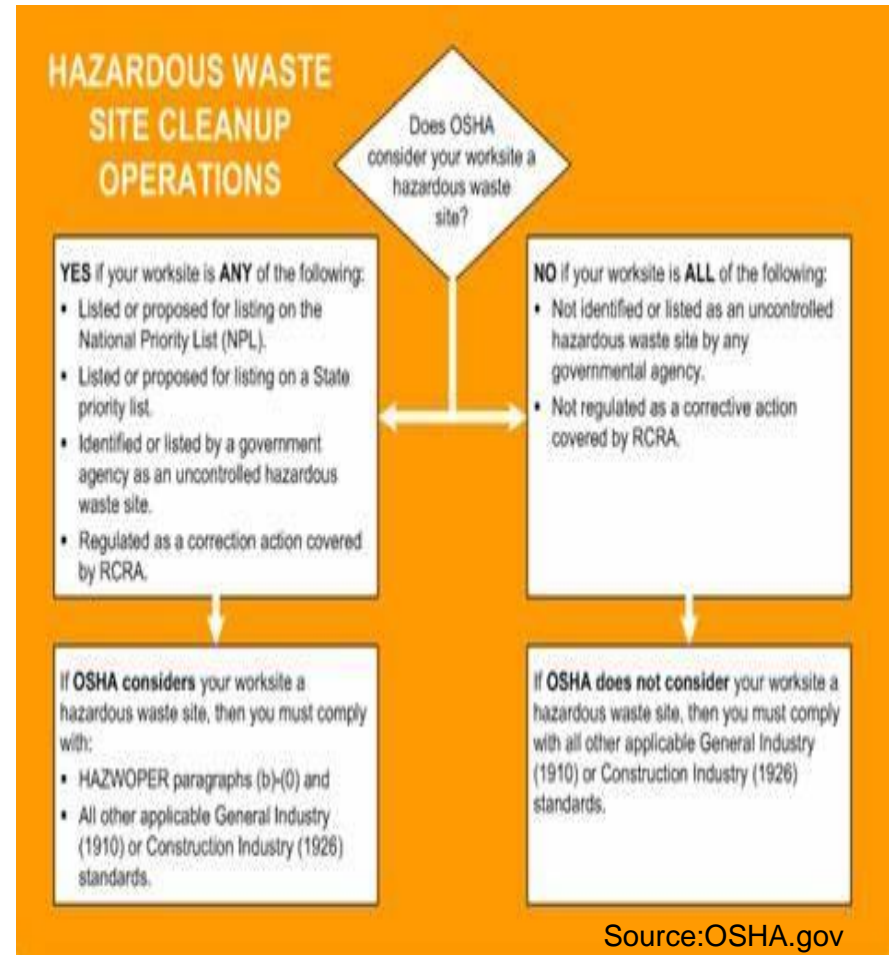


- **Contractor shall prepare a draft and final site-specific Accident Prevention Plan (APP)/ Site Safety and Health Plan (SSHP) for definable features of work associated with the fieldwork tasks described in this contract task order in accordance with the most recent version of the US Army Corps of Engineers Safety and Health Requirements Manual. The APP/ SSHP will be submitted to the Navy Marine Corps Public Health Center (NMCPHC) for review and comment and all comments provided by the NMCPHC shall be adequately addressed prior to finalizing the safety plan.**
- **References:**
 - U.S. Army Corps of Engineers, 2014, Safety and Health Requirements Manual, EM-385-1-1, <http://www.usace.army.mil/SafetyandOccupationalHealth/EM38511,2008BeingRevised.aspx>.
 - OSHA standards 29 CFR 1910.120 and 29 CFR 1926.65

What is HAZWOPER?



- **HAZWOPER = Hazardous Waste Operations and Emergency Response Act (Published in 1990)**
- **29 CFR 1910.120 (General Industry)/29 CFR 1926.65 (Construction): documents identical, different “audience”**
- **Codifies H&S requirements to protect employees that may be exposed to hazardous substances (including HW) during CERCLA and RCRA actions, working at RCRA sites and TSDFs, and during emergency response.**



The Site Safety and Health Plan (SSHP)



- **Site Safety and Health Plan (SSHP) = EM 385-1-1 equivalent to OSHA's HAZWOPER.**
- **EM 385-1-1, Section 33**
- **SSHP requirement and content based on the OSHA HAZWOPER applicability criteria**
- **If applicable, must be prepared as a stand-alone document included as an attachment or appendix to the APP.**
- **It is a critical document for compliance at ERN sites and operations and requires review. NMCPHC provides this expert review.**

APP vs. SSHP: Similarities and Differences

Differences:

SSHP = HAZWOPER. Hazard-Based.

APP = Activity-Based. Required for construction (and other) projects where specified by UFGS and FAR requirements.

Similarities:

- **SSHP is one of the 61 health and safety plans of the APP that requires a determination of applicability.**
- **The APP and SSHP may require duplicate information. Duplication is not necessary when both plans are required. ONCE IS ENOUGH!!!!**

Abbreviated APP



- **EM 385-1-1 based; minimum requirements in Section 01 and Appendix A**
- **Limited scope, supply, service and R&D Work**
- **No construction activities covered.**
- **Examples: LTM, soil and groundwater sampling only, site inspections, routine site and biological surveys, grounds or landfill cover maintenance. SSHP could be a component**
- **Benefits: Time and cost savings for H&S plan development; reduced review and approval time.**
- **Evaluate on case-by-case basis; RPM can make this call during scope development. NMCPHC can assist with determination.**

NMCPHC Role and Responsibility



- NERP Chapters 2 And 17
- On request, we provide technical consultation/document review of APP and SSHP, and most APP-applicable H&S plans.
- Caveats:
 - Contractor is ultimately responsible for the health and safety of their employees.
 - We review and offer consultation and opinion; we have no project or document approval authority!
 - RPM controls project execution and has the authority. We prefer RPM to be included and/or aware of all correspondence and calls with contractors
- ❖ *Desire our technical review?*

Send docs directly to us via email attachment
OR use DODSAFE (Note: RPM must provide link and passcode for contractor to send and for us to retrieve)

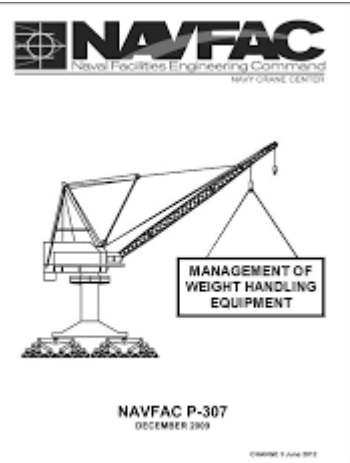
Other "Players" That May Also be Involved



NOSSA

NAVAL ORDNANCE SAFETY AND SECURITY ACTIVITY

PROVIDING WEAPONS AND ORDNANCE SAFETY...TODAY AND TOMORROW



Unique Projects and Situations



- **Multiple Unrelated Operations at the Same Installation**
- **Same project at Multiple Installations**
- **LTM/Landfill Inspection and Maintenance**
- **Demo/Asbestos Actions (Building vs Site Invest./Abatement)**
- **Water Surveys/Sampling (including Dive Operations)**
- **Wildlife Hazards (Cougars, Bears, and Walruses..OH MY!!)**

Case Study Time: Test Your Knowledge!!!!

Case Study #1



- **Scenario**: Porta-john services are required for a groundwater investigation/remediation project (HAZWOPER is applicable) and as such porta-john units must be placed within the site and periodically serviced by the porta-john contractor.

- **Questions**:
 - a. Is HAZWOPER training required for the porta-john service company employees? If yes, what is the level of initial/refresher training that will be needed?

 - b. If training is not required, why not? What conditions would result in a need for employee training?

Case Study #2



- **Scenario:** Sediment sampling and anomaly avoidance is being conducted at an underwater munitions site at NBSD. Sediment sampling is being conducted from two boats, a 25-foot boat and a smaller skiff. Two fieldworkers are transferring from the skiff to the 25-foot boat and the smaller skiff is only tied off at the stern (vs. stern and bow), which in rough waters became unstable and one fieldworker fell in the water, and injured his shoulder during the fall.
- **Questions:**
 - a. How could this have been avoided?
 - b. What should be done if a safety incident occurs?

Case Study #3



- **Scenario**: A biological survey of an endangered species is planned for an IRP area where the soil has both surface and subsurface contamination. Full characterization of the site and the extent (to include concentration) of the contamination is underway and results have not yet been fully reported. Soils will not be disturbed (other than walking and transiting the site) during the biological survey.
- **Questions**:
Does HAZWOPER apply? Could an Abbreviated APP be used?
If HAZWOPER is applicable what level of training would be required for the surveyors?

Case Study #4



- **Scenario:** You have a team conducting brush clearing and surveying as an initial action on a munitions response site in order to delineate and create site access for future determination of UXO at the site. There is a potential for contact with UXO on the surface and below the surface of the soil.

- **Questions:**
 - a. Does HAZWOPER apply?
 - b. What other plans and organizations would be needed to support the APP?
 - c. What are the specific training requirements?

Want more Case Studies?



See OSHA Standards of Interpretation (SOI) Letters. Multiple topic SOIs for Parts 1910 and 1926:

- <https://www.osha.gov/laws-regs/standardinterpretations/standardnumber/1910>
 - <https://www.osha.gov/laws-regs/standardinterpretations/standardnumber/1926>
- ❖ *For HAZWOPER-specific SOIs for various topics and situations, once you go to the link, select 1910.120 (for General Industry) or 1926.65 (for Construction)*

A. OSHA HAZWOPER-Requirements:

- [29 CFR 1910.120 \(HAZWOPER-General Industry\)](#)

<https://www.osha.gov/laws-regs/standardinterpretations/standardnumber/1910/1910.120-%20-%20Index/result>

- [29 CFR 1926.65 \(HAZWOPER-Construction\)](#)

<https://www.osha.gov/laws-regs/standardinterpretations/standardnumber/1926/1926.65-%20-%20Index/result>

B. The Navy and Marine Corps Public Health Center (NMCPHC) website:

- **Accident Prevention Plan:**

https://www.med.navy.mil/Portals/62/Documents/NMFA/NMCPHC/root/Environmental%20Programs/Pages/healthsafety/APP_Checklist_July_2018_rev.pdf

- **Site Safety and Health Plan:**

<https://www.med.navy.mil/Portals/62/Documents/NMFA/NMCPHC/root/Environmental%20Programs/Pages/healthsafety/SSHP-Checklist-Oct-2020.pdf>

Final Thoughts EM 385-1-1



- **Current version: 2014**
- **App no longer available**
- **Watch for release of the “new” EM 385-1-1**
 - Last update (current version) 2014
 - Next release planned btwn 4th quarter 2022/2d quarter 2023
 - Upcoming release is a complete overall
- **What versions to use?**

Conclusion



- **RPMs and NAVFAC Regions are required for projects to:**
- **Develop a Comprehensive Workplan**
- **Develop the APP as required by the contract, using EM 385-1-1 as the guide.**
- **Develop SSHP if HAZWOPER if HAZWOPER is applicable**
- **When developing the APP and applicable plans consider all the players**
- **Definable Features of Work and AHAs a must**

Points of Contact



- **Bob Hayes**

- Office Phone: 757-953-0937
- harold.r.hayes.civ@mail.mil

- **Ryan MacLure**

- ryan.s.maclure.civ@us.navy.mil

***Questions? Email to
EXWC_T2@navy.mil***

Wrap Up



Please complete the short Survey Monkey when you leave the webinar: <https://www.surveymonkey.com/r/BYLK5LY>

Stay tuned for upcoming OER2's via email:
EXWC_T2@navy.mil.

You can find previous presentations on the [ERB Website](#)> [OER2 Presentations](#) and our [OER2 YouTube channel](#) all found on <https://exwc.navfac.navy.mil/go/erb>

Thank you for participating!

EXTRA SLIDES



OSHA's Job Hazard Analysis Form



osha3071.pdf | Microsoft Edge | File | C:/Users/malrr/OneDrive/Documents/REFERENCE%20MATERIALS/osha3071.pdf

Would you like to set Microsoft Edge as your default browser? [Set as default](#)

50 of 51 | Page view | Read aloud | Add text | Draw | Highlight | Erase

Appendix 3 Sample Job Hazard Analysis Form

<i>Job Title:</i>	<i>Job Location:</i>	<i>Analyst</i>	<i>Date</i>
<i>Task #</i>	<i>Task Description:</i>		
<i>Hazard Type:</i>	<i>Hazard Description:</i>		
<i>Consequence:</i>	<i>Hazard Controls:</i>		
<i>Rational or Comment:</i>			

<https://www.osha.gov/sites/default/files/publications/osha3071.pdf>

HAZWOPER Application

Applies to 5 Distinct Operations



HAZWOPER = Employees are or may be exposed to hazardous substances (including hazardous waste) during:

- 1. Clean-up operations and initial investigations required by a governmental body that are conducted at uncontrolled hazardous waste sites (CERCLA);**
- 2. Corrective actions involving clean-up operations at sites covered by the Resource Conservation and Recovery Act of 1976 (RCRA) ;**
- 3. Voluntary clean-up operations at sites recognized by federal, state, local, or other governmental body as uncontrolled hazardous waste sites;**

HAZWOPER: 5 Distinct Operations



4. Operations involving hazardous wastes that are conducted at treatment, storage, and disposal facilities regulated by 40 CFR Parts 264 and 265 pursuant to RCRA, or by agencies under agreement with U.S. Environmental Protection Agency to implement RCRA regulations.

5. Emergency response operations for releases of, or substantial threats of releases of, hazardous substances regardless of the location of the hazard.

Note: Further details and explanations of operational applications can be found in 29 CFR 1910.120 and 29 CFR 1926.65

Case Study



- **Scenario**: A building will be constructed on property previously occupied by a dry cleaning facility. Only the groundwater is contaminated; construction operations will not reach the level of contamination. **Questions**:
 - a. Does HAZWOPER apply?
 - b. If not, why not?
 - c. Under what conditions would HAZWOPER be applicable?

Case Study



- **Scenario**: As part of a cleanup action you are removing lead contaminated soil from a site. Your exposure determination indicates that potential employee lead exposures are below the OSHA occupational exposure limits for lead.

- **Questions**:
 - a. Which standard is applicable; HAZWOPER or OSHA-lead?
 - b. What is the basis for your determination of the applicable standard?

Case Study #2 Answers



• Answers:

- a. Prepare a boat safety specific plan and include AHAs on boating safety and transferring from boat to boat.
- b. Stop work. Follow command incident reporting procedures- Contractor Incident Report System (CIRS)) is reported in ESAMS. Commanders Critical Information Requirements (CCIR) NAVFACSWNOTE 5214 (Sept. 2019) is a NAVFAC SW note that includes reporting requirements for incidents requiring notification to the CO via chain of command (e.g., death, serious injury, non-fatal injury resulting in loss of work). Check your command/installation for site-specific reporting requirements. Re-evaluate APP/SSHP and revise accordingly, including all applicable AHAs to address all potential hazards.