

**EPA Comments on In Situ Stabilization and Solidification Field
Pilot Study Health and Safety Plan
Gasco Sediments Project Area
Dated August 29, 2023**

Comments dated September 8, 2023

Following are EPA's comments on the In Situ Stabilization and Solidification Field Pilot Study Health and Safety Plan (HASP), prepared by Anchor QEA, LLC on behalf of NW Natural. Note that EPA does not approve health and safety plans, but reviews for completeness.

General Comments on HASP: Not applicable.

Specific Comments on HASP:

1. **Liability Waiver, pages L-1 through L-2:** Some of the language, particularly in points 1, 2, and 4, seem to conflict with OSHA's General Duty Cause and the employer's obligation to provide a workplace free of recognized hazards.
2. **Section 5.2, Project Air Monitoring Requirements, Table 5-1, Project Job Tasks and Required PPE, page 10:** Consider adding two-way radio communication or another verified means of communication during emergencies for the following job task: *Field activities on shore or on vessels with no anticipated direct contact with soils, sediments, sheens, or decontamination chemicals, including deploying instrumentation.*
3. **Section 7.4.1.3, Safety Equipment, page 20:** Specify how equipment that Anchor QEA and/or a subconsultant is providing complies with regulatory requirements (e.g., PFD's meet U.S. Coast Guard [USCG] requirements).
4. **Section 8.5, Handling of Investigation-Derived Waste, page 23:** Provide detail on the disposal method for waste generated and staged during the handling of investigation-derived waste.
5. **Attachment B, Job Safety Analysis Documents:** Consider incorporating the potential wildfire hazard into applicable job safety analysis documents.
6. **Attachment B Job Safety Analysis Documents, Boat/Barge Activities:** It is suggested that language be included to address the following:
 - a. Training and certification of crew members
 - b. Communication methods
 - c. Embarking and disembarking of crew members
 - d. Housekeeping procedures
7. **Attachment C Safety Data Sheets:** It is suggested that a safety data sheet table of contents be included.
8. **Section 12.1.14, Boating Operations and Section 12.1.15, Working Over or Near Water, pages 46-49:** While each section alludes to ring buoys and retrieval lines being needed, a specific

subsection on Man/Person Overboard Procedures should be added. This should also be referenced in the emergency response procedures section that precedes the Table of Contents.

9. **Section 12.2.11, Public at Large, page 64:** This section does not directly address the hazards presented by unhoused community members. Security concerns and procedures should be listed.