

**EPA Comments on Contractor Health and Safety Plan  
In Situ Stabilization and Solidification Field Pilot Study  
Gasco Sediments Project Area  
Dated September 1, 2023**

Comments dated September 8, 2023

Following are EPA's comments on the Contractor Health and Safety Plan (HASP), In Situ Stabilization and Solidification Field Pilot Study, Gasco Sediment Project Area prepared by Severson Environmental Services, Inc. on behalf of NW Natural. Note that EPA does not approve health and safety plans, but reviews for completeness.

**General HASP Comments:**

- 1) Including bookmarks in the final electronic version of the HASP will aid in its usability.
  - a) Bookmarks included on the PDF submission.
- 2) Personnel, respirator, and equipment decontamination procedures do not provide adequate user instruction. Update the HASP to clearly identify step by step decontamination procedures.
  - a) Text revised and figures added to clearly identify step by step decontamination procedures.

**Specific HASP Comments:**

- 1) **Section 5.0, Safety and Health Training, pages 25-27:** It is suggested to identify HAZWOPER training requirements for site work and provide personnel certifications as an attachment to the HASP.
  - a) HAZWOPER section added to section 5.0 to provide HAZWOPER training information.
- 2) **Section 8.2.1 VOCs, pages 34-35:** Identify the type of PID lamp selected for the contaminants of concern in this subsection and/or in Table 8 - Operational Action Levels 8-hour TWA.
  - a) 10.6 eV PID lamp added to text and Table 8.
- 3) **Section 9.14, Signs, Signals, and Barricades, page 53:** Identify flagger and spotter training requirements.
  - a) Flagger removed from the plan. No active public road exposure is anticipated for this project. Text was carry over from another plan used to prepare this one.
- 4) **Section 9.17, Working On or Near Water, pages 55-56:** Identify the specific safety responsibilities of personnel (e.g., boat captain, SSHO, etc.) while working on water.
  - a) Responsibilities added to section.
- 5) **Section 10.1, Work Zones, pages 58-59:** Provide the initial work zone map template which may be updated in the field.
  - a) Figure added to section.
- 6) Appendix A, Activity Hazard Analysis, Mobile Elevated Work Platform, pdf pages 97-102:  
Describe rescue procedures in the event of malfunction or power failure.
  - a) Text added to AHA for malfunction or power failure. Control is for SSHO and Superintendent to prepare a documented rescue plan based on the height and location of the MEWP prior to its use.