

**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.
2. Personnel, respirator, and equipment decontamination procedures do not provide adequate user instruction. Update the HASP 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.
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.
3. **Section 9.14, Signs, Signals, and Barricades, page 53:** Identify flagger and spotter training requirements.
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.
5. **Section 10.1, Work Zones, pages 58-59:** Provide the initial work zone map template which may be updated in the field.
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.