

NJDEP Technical Guidance Document Review Form

Document: *"FSPM Chapter 13 - Personnel Protection"*

Comment Period: July 26, 2023 to September 8, 2023

NJDEP Committee Chairperson: Crystal Pirozek

Comment #	Page	Section	Subsection	COMMENTS	RESPONSE
1	ALL	ALL	ALL	Across the document, all acronyms need to be spelled out upon first use.	Agreed to change
2	General			NJDEP should consider deleting third section for the FSPM. The is no "New Jersey specific" information or requirement and this information is discussed in detail by OSHA and USEPA, and these requirements would apply to the field / sampling work being completed in the FSMP. While this chapter provides a nice synopsis, it is redundant and potentially confusing if USEAP and OSHA make changes to the governing documents, and the FSPM is not updated in a timely manner.	Agree that NJ does not have specific information however agreed to leave section as general information and provide links to specifics from OSHA
3	2	13	1	CFR, NIOSH, OSHA, USCG and EPA are all used without defining the acronyms.	Agreed to change
4	2	13	1	PPE acronym is defined in both the 1st and 2nd paragraphs. This is not necessary.	Agreed to change

5	2	13	1	Include statement on initial hazard control following hierarchy and PPE as last line of defense. "Depending on the hazard(s) identified, elimination, substitution, engineering, work practices/administrative controls should be implemented first or in conjunction with PPE based on the hazard analysis of the site."	Added to 13.2
6	2	13	1	3rd paragraph - "Subsequent information <u>obtained through exposure monitoring or other site assessment and evaluation procedures may suggest...</u> selected. <u>Personnel should only don PPE that they have been adequately trained and deemed medically fit to wear.</u> "	Agreed to add
7	2	13	2	Understand and acknowledge the surroundings. Many injuries come from the result of a lack of attention to surroundings including slips, trips, falls, animals, insects, and machinery	Agree to the hazard however agreed it is not applicable to this chapter
8	2	13	2	Write out "Quality Assurance Project Plan (QAPP) the first time QAPP is mentioned.	Agreed to change
9	3	13	2	"HASPs or similar documents should also contain the hazard analysis or standard operating procedures for the site-specific activities, <u>as well as the applicable levels of PPE required based on known or anticipated conditions and hazards.</u> "	Agreed to add
10	2	13	3	QAPP is used without defining the acronym.	Agreed to change
11	3	13	3	VOC, LEL are used without defining the acronyms.	Spelled out words
12	4	13	4	"...and other limitations. <u>For known or potential chemicals of concern, SDSs should also be reviewed.</u> In all cases,..."	Agreed to add
13	4	13	4.1	Add a bullet that PPE should fit properly (as oversized PPE or PPE too small can cause additional hazards).	Agreed to add
14	4	13	4.2	Change line 4 from "radioactive materials exist" to "radioactive materials are present"	Agreed to change

15	4	13	13.4.2	Suggest adding a reference for further information regarding "Unique problems are associated with radioactive material, and it is beyond the scope of this manual to discuss them properly."	Added Ch 12 reference
16	4	13	4.3	"be tailored to the specific situation, such as, <u>but not limited to, specific chemical hazards, physical hazards or biological hazards</u> , in order to provide the most appropriate level of protection."	Agreed to add
17	5-7	13	4.3	For the Ensembles/Level of Protection PPE requirements, broken down to Level D (lowest) to level A (highest) protection levels, the equipment mentioned falls under two categories. "Recommended," and "Optional." What is Required for each category?	NJDEP does not require certain PPE, it is a OSHA standard for protection
18	5	Table	13.1	Equipment column: Traffic Safety Vest - each word is capitalized when all other equipment words after the first are lowercased; be consistent on formatting.	Agreed to change
19	5	Table	13.1	Should be used when column: 2nd row has no bullets, all other rows of the table are bulletized; be consistent on formatting.	Added bullet
20	5,6,7	13	Table 1	consider using EPA Levels of protection as recommended PPE (for consistency), and add to it based on optional need - https://www.epa.gov/emergency-response/personal-protective-equipment	NJDEP and USEPA use OSHA guidance.
21	5	13	Table 1	Level of protections may be rearranged to descending order of protections (level A to level D) so it would allow the reader to follow hierarchy of control technique to determine which level of protection is appropriate for their task, and also reader does not need to scroll further down to check another higher level of protection to find out what actually they need at a lower protection level once decided. As for example, level C protection indicated that the same level of skin protection as level B, but a lower level of respiratory protection is recommended, which would require a reader to scroll down further into level B protection to find out what specific skin protections are mentioned there.	Agreed to list levels from lowest level of protection to the highest

22	5	13	Table 1	Level D protection may recommend as "optional" that safety boots/shoes be chemical resistant or have disposable chemical resistant outer covering, if there is potential for cross-contamination from walking/working surfaces.	Agreed to add
23	5	13	Table 1	Level D protection may recommend hard hat as "optional" to protect head from low clearance/overhead hazards.	Agreed to add
24	5, 6	13	Table 1	Level C, Level B and Level A protections should not include "two-way radio" as personal protective equipment because two-way radio is a communication device and should be a part of communication plan.	Agreed to leave 2 way radio as a form of safety protection and hazardous communication
25	7	13	5	Efforts should be made to reduce/eliminate the hazardous atmosphere by means of engineering controls, such as ventilation before entry and the use of respiratory protection .	Added to 13.5
26	7	13	5	In the bulleted section, include medical evaluation and surveillance, Inspection of respiratory equipment, cleaning and storage, limitations of equipment.	Changed bullet list
27	7	13	5.1	last sentence - consider adding "SCBAs are used in permit required confined spaces...asphyxiation hazards, or when making an initial entry and the type and concentration of a hazardous atmosphere is unknown or when the limitations of an APR exceeded."	Agreed to change
28	7	13	5.1	SCBA acronym is defined in the table of contents and then in the header, and then in the 1st sentence. This is duplicative. Also - SCBA appears in Table 13.1, before this section. If the acronym definition is removed from the atable of Contents - it should be defined at the first use of the acronym.	Removed duplicates
29	7	13	5.2	MSHA is used without defining the acronym.	Agreed to change
30	7	13	5.2	<u>"... or asphyxiation hazard, or when concentrations of the contaminant are too high for an APR or when the toxicity of a material is too hazardous for an APR.</u>	Agreed to add

31	8	13	5.4	Paragraph 2 remove comma from item 2 (before which)	Agreed to remove
32	9	13	6	Addition: Ensure enough individuals are present in relation to the level of PPE, ambient temperatures, etc.	Agreed to add
33	9	12	6.1	In the interest of Safety, for the Heat Stress Monitoring section, I would suggest adding another optional monitoring category that encapsulates overall well-being. This could include a brief "Are You Okay?" type of conversation, and if their responses are slurred in speech, further work should be stopped. Medical treatment may be required to keep individuals healthy and safe.	Agreed to add
34	10	12	6.2	If possible, increase fluid intake several days prior to event. Have on hand adequate fluids for individuals during event	Agreed to add
35	10	13	6.2	"To avoid heat stress, take the following steps: - adjust work schedules <u>to include acclimatization period, working in cooler parts of the day, and implementation of a work/rest schedule.</u> "	Agreed to add
36	10	13	13.6.2	Table 13.2 - Suggest revising "dizziness and confusion" under heat stroke to "altered mental status". This is one of the major indicators of heat injury progressing to heat stroke and should be the primary sign/symptom to be identified.	Agreed to change
37	10	13	13.6.2	Table 13.2 - suggests removing "coma" under heat stroke. This is not useful for field based events.	Agreed to leave because it is important to know if the individual is thought to have heat stroke
38	10	13	13.6.2	Table 13.2 - suggest adding Heat Syncope into the table. See information at https://www.cdc.gov/niosh/topics/heatstress/heatrelillness.html	Add the cdc link
39	10	13	13.6.2	Food intake can affect disposition to heat injury. Suggest adding into bullets under "Prevention".	Agreed to add
40	10	13	13.6.2	"Maintain worker's body fluids at normal levels". This statement sounds odd. We should encourage workers to increase fluids (preferable water) intake the day prior, during, and following heavy work in heat.	Agreed to add

41	10	13	13.6.2	Limiting large amounts of caffeine prior to heavy work in heat will help prevent heat injury. Strongly discourage energy drinks.	Agreed to add
42	10	13	6.2	For the Prevention section, could you please define "Proper training?"	Changed to be more clear
43	11	13	7	Change "chapter" to "section". Understood that previously personal decontamination was its own chapter - now combine should refer to as "section".	Agreed to change
44	11	13	7	Consider adding after last sentence of first paragraph - "Site-specific personal decontamination procedures including doffing and disposal or reuse of PPE should be outlined in the site HASP."	Added to first paragraph
45	11	13	7	Punctuation: add comma after 'entry': "Prior to entry, the site history..."	Agreed to add
46	11	13	7	Punctuation: remove comma after 'exclusion zone or' to read "...occur prior to any entry into any exclusion zone or contaminated areas..."	Agreed to remove
47	11	13	7.1	Suggest changing "...below show the order recommended for contaminant reduction personnel and for doffing personal protective equipment." to "show the order recommended for contaminant reduction <u>of</u> personnel and for doffing PPE"?	Agreed to change
48	12	13	7.4	"The materials need to be handled according to local, state, and/or federal waste handling rules. IDW should also be stored in inspected containers with no visible leaks, holes or deformities. Containers/drums should also be made of compatible materials with the chemical components of the IDW."	Agreed to add
49	12	13	7.4	Consider adding a bullet point to ensure the container is labeled appropriately prior to storage or removal from the site.	Paragraph 2 states labels should be placed prior to being filled.
50	12	13	7.4	RCRA is used without defining the acronym.	Agreed to change

51	12	13	7.4	Second bullet list, add ";" after bullet 2, or delete from all to be consistent with bullet list above	Changed labeling to it's own bullet
52	13	Figure 13.2		Steps 10 and 11 may to be swapped because SCBA backpack donned outside of splash suit, and removing the SCBA backpack before removing safety boot is preferred from ergonomic point of view.	10 and 11 swapped
53	17	Figure 13.4		This figure fits perfectly with Level A protection where fully encapsulated suit needs to be removed before removing SCBA backpack or respirator. This figure may not fit perfectly with Level B and C protections where lower level of skin protection is required than Level A, and SCBA backpack (if needed) usually donned over splash suits or coverall. Therefore, SCBA backpack may needs to be removed first before removing outer garments for disposal. So, a separate figure may be needed to depict minimum decontamination area layout for level B or C.	Image corrected