

NJDEP Technical Guidance Document Review Form

Document: "FSPM Chapter 4 - Site Entry Activities "

Comment Period: December 2, 2021 to January 7, 2022

NJDEP Committee Chairpersons: Crystal Pirozek and Biff Lowry

Comment #	Page	Section	Subsection	COMMENTS	RESPONSE
1	1			Suggest including an overall list of acronyms based on the large number used in this section.	added a separate acronym list to the manual
2	1	4.1		Suggest providing a link to the EPA On Scene Coordinators Toolbox available at: https://response.epa.gov/main/healthsafety.aspx for additional information.	agreed to add
3	2	4.1		In the list of links that include "Soil Investigation Technical Guidance" and "Ground Water Technical Guidance", some introductions to links have colons and others do not. It should remain consistent.	agreed to change
4	2 - 3	4.2	2	Suggest providing links to Chapter 1 where appropriate.	added a chapter 1 reference to 4.1
5	2	4.2	2	First paragraph - Change "advanced" to "advance"	agreed to change
6	3	4.2	2	should upstream and downstream conditions of the site also be listed in this section?	added text to reference site surroundings
7	3	4.2	2	In the list of bullet points, it appears that the spacing between each bulleted point is not consistent.	agreed to change
8	3	4.2	2	Bullet 1. Suggest also identifying "trip and fall" hazards in addition to exposure hazards and risks..	added trip and fall and natural hazards
9	3	4.2.	2	Bullet 3. Suggest also indicating of there are different areas of investigation and remediation that are part of the overall Site.	added text to make clear
10	3	4.2	2	Bullet 8. Suggest indicating the hazards for specific locations may need to be identified especially at large sites.	added text to make clear
11	3	4.2	3	the wording, "paragraph" should be changed to "item." This occurs where it mentions paragraph 2 and 3 and paragraph 1. Since 1-4 are all item numbers it shouldn't be considered a paragraph.	agreed to change
12	3	4.2.	3	Suggest giving consideration to the fact that on-site workers may cover a range of individuals e.g., regulators, contractors, and subcontractors and how they are considered in the classifications listed in the numbered bullets and the need for coordination with these various worked and organizations.	changed text to make clear
13	4	4.2	3	I believe the word, "current or up-to-date" should be added in the sentence about the employer keeping a summary list of health and safety topics and elements administered to the employees.	agreed to change

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14	5	4.2	4.1.	Suggest indicating consideration of replacement of equipment where necessary.	changed text to make clear
15	5	4.2	5	In the first sentence of the 3rd paragraph: the word,"into" should be added after incorporated	agreed to change
16	5	4.2	5	It may be worth adding considerations for exhaustion from long working hours to this sub-section or within another part of section 2.	changed text to make clear
17	5	4.2	5	There is an extraneous comma after "and/or" in the last paragraph of this sub-section.	agreed to change
18	6	4.2	6.1	Towards the end of the first paragraph on page 6, "air- monitoring" is typed with a hyphen while in other parts of this chapter it is not written with a hyphen. Is there a reason for this?	removed all hyphens
19	6	4.2	6.1	The second to last bullet point ends with a period when none of the others do.	agreed to change
20	6	4.2	6.2	The first sentence in section 4.2.6.2 should say "To develop and implement area and personnel air sampling programs during the project should be evaluated and included in the site HASP." The word "in" is currently missing.	agreed to change
21	6	4.2	6.2	The introductory sentence in this subsection does not make sense to me. Either it is wrong or it is just too confusing.	sentence reworded
22	6	4.2	6.2	In the first paragraph of the section and in the first sentence, the word, " in" should be placed before the word "the."	agreed to change
23	6	4.2	6.2	First sentence needs revision, reads strangely.	sentence reworded
24	7	4.2	6.3	First Sentence - Cites requirements set forth at "Subpart C of 29 CFR 1910.120". Is Subpart C here meant to be a paragraph within 1910.120 as in 1910.120(c), or Subpart C of 29 CFR. Subpart C of 29 CFR is listed as Reserved.	citation corrected
25	7	4.2	7	First sentence is long and challenging to read, may want to revise.	changed text to make clear
26	7	4.2	7	Suggest linking to Section 4.2.3 where daily briefings are identified as a part of the process.	agreed to not link 4.2.7 with 4.2.3
27	7	4.2	7	Suggest including a bullet where areas where the individual worked on a specific day are identified, especially for large sites.	the last bullet states that areas visited should be identified on the log
28	8	4.2	8	The first sentence in the second paragraph of this section should say "Personnel and equipment decontamination procedures appropriate for the site shall be included in the site HASP." The word "in" is currently missing.	agreed to change
29	8	4.2	8	In the second paragraph on page 8, first sentence, the word, "in" should be place before the word, "the."Missing word "in" after "included"	agreed to change
30	8	4.2	9	Suggest indicating where these documents will be available during work on the site.	agreed to not list document location. Should be discussed during the morning meeting.

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31	8	4.2	9	Bullet points #8 and #14 under the ERP end with periods while not of the other bullet points do.	removed periods
32	9	4.2	9	Last sentence - Missing punctuation	agreed to change
33	9	4.2	9	At the end of the "Verification of Medical Facility Preparedness" paragraph there should be a period.	agreed to change
34	9	4.2	10	At the end of the bullet points listed, there should be a period if the chapter is suppose to remain consistent throughout.	only lists that make complete sentences get semi colons and period after the bullets.
35	9	4.2	10	Suggest clarifying the statement in bullet 2. to explain that this information is provided as a safety precaution and to limit exposures to other workers not working on confined spaces so that these areas can be avoided..	changed bullet to make more clear
36	10	4.2	10	The paragraph that ends at the top of page 10 needs to end with a period.	agreed to change
37	10	4.2	10	top of page - Missing punctuation	agreed to change
38	10	4.2	11.2	The title of this subsection has a colon when no other subsection includes a colon in the title.	agreed to change
39	11	4.2	11.2.1	end of first paragraph - Missing punctuation	agreed to change
40	11	4.2	11.2.1	The first paragraph in this subsection needs to end with a period.	agreed to change
41	12	4.2	11.2.2	In Table 4.1, the license titles are outdated or need to be updated.	removed table 4.1 and changed section to make more clear
42	12	4.2	11.2.2	second paragraph - Change "This table is" to "Table 4.1 contains" for clarity	agreed to change
43	12	4.2.	11.2.2	Suggest removing Please.	agreed to remove
44	13	4.3	1	Suggest including a list of the Levels of protection or a link for additional information.	agreed to leave and will discuss further in chapter 13 of the manual
45	13	4.3	1	The last sentence in this subsection needs to end with a period.	agreed to change
46	14	4.3	2	This section states that "Due to the nature of hazardous materials, especially materials of unknown concentrations, a minimum of two persons should be present. Under no circumstances should field personnel go on site alone." I have seen, and been involved with, multiple field sampling events where there was only one person on-site. I suspect this is common across the industry. Is this guidance applicable to ALL sites or only those where the contamination is not well understood? If the former, that should be made more clear. In addition, it may be prudent to specify how close together personnel should be on a large site where they don't work in view of each other.	agreed that it is an OSHA requirement to have two field personnel onsite.
47	16	4.4	3.3	The "and or," in the first sentence in the second paragraph of section 4.4.3.3 should be "and/or".	agreed to change

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48	16	4.4	3.4	It is recommended that an infrared camera be used on the initial site entry and reconnaissance. The infrared camera is helpful in viewing organic vapors leaking from tanks and pipes that are not visible to the naked eye. It can also be used to view liquid levels in tanks. It also reduces potential exposure to the site entry team because it can see things from a distance and also view things that are elevated without having to climb a ladder.	agreed to leave the section more general and not be specific due to the issues with detected inorganic vapors
49	17	4.4	3.7	Last sentence - References Table 4.1 at end of chapter, there is already a Table 4.1 prior. Change to reference Table 4.2.	agreed to change
50	18	4.4	3.7	Change Table 4.1 to Table 4.2	agreed to change
51	18	4.4	3.7	Table name must be changed to Table 4.2	agreed to change
52	18	4.4.	3.7.	Table 4.2. Suggest including a link to the basis for the various levels.	single link not available
53	18	4.4	3.7	In Table 4.2, the action for "Total response mode" under "Photoionization Detector" is written as "For unknown contaminants. Use strict guidelines to determine level of protection" while under "Total Response mode" for "Flame Ionization Detector" it is written as "For unknown contaminants, use strict guidelines to determine level of protection". While they appear to be the same statement, one has a comma and one has period in the middle. They should be consistent and should also both end with a period.	changed the table so the descriptions match
54	19	URL		Why is there no URL section? Every other chapter we reviewed included a URL section.	we discuss Urls in 4.1, no additional urls were needed
55	19	References		The third reference should have a comma between "October" and "1982".	agreed to change
56	19	References		This is the link for the EPA 1985 Site Inspection Training Course https://nepis.epa.gov/Exec/zyNET.exe/9100ZNDE.TXT?ZyActionD=ZyDocument&Client=EPA&Index=1981+Thru+1985&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C81thru85%5Ctxt%5C00000021%5C9100ZNDE.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75q8/r75q8/x150y150q16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL	links have been updated
57	19	References		Under "References", there is no reference indicated that post-dates the year 2000. Did the NJDEP not reference more recent documents as part of the development of the revised FSPM? This does not seem likely. The NJDEP should update their "References" as appropriate. Furthermore, the New Jersey Technical Requirements for Sit Remediation, N.J.A.C. 7:26E, July 2, 1999 is referenced. Presumably, this should be updated to the August 6, 2018 version.	references were updated and Urls were added to show the locaiton of new informaiton used
58	20	References		Suggest including links for the various documents provided in this Section.	links are provided in section 4.1 and in the reference section.