DEPARTMENT OF THE NAVY
BUREAU OF MEDICINE AND SURGERY
7700 ARLINGTON BOULEVARD
FALLS CHURCH, VA 22042

IN REPLY REFER TO
BUMEDINST 6270.8C
BUMED-M44
31 May 2017

BUMED INSTRUCTION 6270.8C

From: Chief, Bureau of Medicine and Surgery

Subj: OCCUPATIONAL HEALTH HAZARD ASSESSMENTS

Ref: (a) DoD Instruction 5000.02 of 7 January 2015
(b) DoD Directive 5000.01 of 12 May 2003
(c) DoD Instruction 6055.05 of 11 November 2008
(d) SECNAVINST 5100.10K
(e) OPNAVINST 5100. 19E
(f) OPNAVINST 5100.23G
(g) OPNAVINST 5100.24B
(h) OPNAVINST 5090.1D

Encl: (1) Requesting a Health Hazard Assessment

1. Purpose. To implement policy, provide technical requirements and standardized procedures for requesting Health Hazard Assessments (HHA), and assign responsibilities within Navy Medicine for performing HHAs under the authority of references (a) and (b).

2. Cancellation. BUMEDINST 6270.8B.

3. Scope. This instruction applies to all ships and stations that have Navy Medicine personnel assigned.

4. Background. References (a) and (b) guide the Services in support of defense acquisition programs and require occupational hazard risk reduction across operational systems. References (c) through (h) require the Department of the Navy to provide early identification and resolution of recognized health hazards during development and fielding of operational platforms. To assist with maintaining operational readiness, Navy Medicine provides HHAs for submarines, surface vessels, aircraft, shore activities, and other operational commands of the U.S. Navy and U.S. Marine Corps.

5. Discussion. HHAs are evaluations to inform acquisition program managers of potential health effects associated with the use of a product, chemical, or the operation of equipment. Assessments may be requested to evaluate new products or processes, consider changes to previously evaluated products and processes, or address reformulations of products. Relevant human health impact due to environmental pollutants may also be addressed. It is incumbent on acquisition program managers and commands to address safety and occupational health risks when selecting materials or processes.

6. Responsibilities

a. Commanding Officer, Navy and Marine Corps Public Health Center (NAVMCPUBHLTHCEN) must:

(1) Provide HHAs upon request from Navy and Marine Corps acquisition program managers, shore activities, ships, and other operational commands of the U.S. Navy and U.S. Marine Corps.

(2) Provide technical requirements for requesting HHAs, guidance for proper submission of HHA requests, and a list of supporting documentation that is required before HHAs will be authorized and conducted.

(3) Ensure that HHAs are conducted objectively using the most current information and sound scientific principles. The safety and health of Service members and civilian employees must be the primary considerations for assessments and recommendations.

(4) Coordinate with Commanding Officer, Naval Medical Research Unit Dayton to resolve data gaps in toxicological information required to adequately assess the risk to personnel from exposure to materials in operational areas of concern. These data gaps may include toxicity testing (in vivo and/or in vitro systems) for endpoints of concern that are absent from the toxicity database or that are determined to be insufficient to adequately assess the risk.

b. Commanding Officer, Naval Medical Research Unit – Dayton must:

(1) Evaluate scientific and toxicological literature upon request from the Commanding Officer, NAVMCPUBHLTHCEN.

(2) Identify data gaps in the scientific and toxicological literature necessary for conducting a HHA and make recommendations for research to fill such data gaps.

(3) Make recommendations for research, include anticipated resources required (e.g., financial resources, human subjects, staffing), and determine if the research will be conducted by the Naval Medical Research Unit – Dayton.

7. Requesting HHAs

a. Enclosure (1) provides standard operating procedures for HHAs that include the review process, cancellation policy, and requirements for: requesting a HHA, describing product use information, handling proprietary and competition-sensitive information, mandatory supporting documentation, and flexible submission and mailing options.

b. U.S. Navy and U.S. Marine Corps activities who sponsor a supplier or manufacturer for the purpose of requesting a HHA must:

(1) Request HHA in writing on command letterhead. NAVMCPUBHLTHCEN does not perform independent product reviews and will not accept information directly from a supplier or manufacturer. A U.S. Navy or U.S. Marine Corps activity must serve as sponsor.

(2) Provide all supporting documentation required by enclosure (1). HHAs cannot be conducted with incomplete submissions that lack sufficient supporting documentation. Certain supporting documentation is mandatory. If "required" information is missing, the HHA cannot be conducted. Emergency situations will be accommodated, as needed, when accompanied by an explanation of the immediate need or seriousness of the situation.

(3) Review the HHA request for completeness validating it against the requirements contained in enclosure (1) prior to submission.

(4) Ensure all required supporting documentation is included to prevent the request being cancelled for inadequate supporting documentation. Submit by e-mail, fax, or United States Postal Service (USPS).

c. How to request a HHA is also available on the NAVMCPUBHLTHCEN public Web site: http://www.med.navy.mil/sites/nmcphc/Documents/industrial-hygiene/REQUESTING-A-HEALTH-HAZARD-ASSESSMENT.pdf.

8. Records Management. Records created as a result of this instruction, regardless of media and format, must be managed per SECNAV M-5210.1 of January 2012.

9. Review and Effective Date. Per OPNAVINST 5215.17A, Bureau of Medicine and Surgery will review this instruction annually on the anniversary of its effective date to ensure applicability, currency, and consistency with Federal, Department of Defense, Secretary of the Navy, and statutory authority using OPNAV 5215/40, Review of Instruction. This instruction will automatically expire 5 years after the effective date unless reissued or canceled prior to 5-year anniversary date, or an extension has been granted.

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Releasability and distribution:
This instruction is cleared for public release and is available electronically only via the Navy Medicine Web site at: http://www.med.navy.mil/directives/Pages/BUMEDInstructions.aspx

REQUESTING A HEALTH HAZARD ASSESSMENT

1. Purpose. To provide requirements and supplemental standardized operating procedure for requesting HHAs from the NAVMCPUBHLTHCEN per this instruction.

2. Submission Requirements. Prepare an official letter requesting a HHA and include test results, supporting documents, and contact information (name, e-mail, and phone). Submit to the NAVMCPUBHLTHCEN Industrial Hygiene Department. Requests and supporting technical documentation may be transmitted by e-mail, fax, or USPS:

a. Electronic. Submit by e-mail, signed requests from a Navy or Marine Corps sponsor with all supporting technical documents to Head, Acquisition Technical Support Division at: usn.hampton-roads.navmcpubhlthcenpors.list.nmcphc-HHA@mail.mil.

b. Paper. Mail to:

Commanding Officer
Navy and Marine Corps Public Health Center
Industrial Hygiene - HHA
620 John Paul Jones Circle
Portsmouth, VA 23708-2103

c. Fax. Fax to (757) 953-0689. Mark the fax cover sheet Health Hazard Assessment (HHA) or Submarine Materials Review.

3. Independent Product Review. NAVMCPUBHLTHCEN does not perform independent product reviews and will not accept information directly from a supplier or manufacturer. The official request must come from a U.S. Navy or U.S. Marine Corps sponsoring organization.

4. Product Use Information. The request letter must provide information on how the product will be used, the amount to be used per operation/application, special operating conditions, and other pertinent information related to the specific U.S. Navy or U.S. Marine Corps application. The following specific information is required, if applicable:

a. Where will the product be used? Describe the specific ship or general class of ship, and whether it is an exterior space, interior space, flight deck, tank, hangar bay, or other.

b. How the product will be applied? Provide description, e.g., brush and roller painting vs. spray painting. If spray painting, identify the type of spray painting (e.g., plural system, compressed air, airless spray, high volume low pressure, etc.). Identify the mechanical means of application vs. adhesive use, Q-tip vs. syringe, etc.

c. Who will be applying the product? Identify the type of personnel, (e.g., Navy civil service employees, ships' forces, contractors, other).

d.

e. Describe the quantity of the product that will be applied.

f. Identify potential for temperature change. If there is a possibility of temperature change to the applied product, list the maximum temperature (for example, adhesive applied to electrical components that may create heat, grease application to an engine that will create heat during operation).

g. Specify whether the product will be stored aboard a vessel, and if so, in what quantity.

g. The technical documentation required in paragraph 8 below is usually supplied by the manufacturer.

5. Review Process

a. The review process does not start until NAVMCPUBHLTHCEN has both the request letter and the required technical documentation. If the documentation is not received within 1 month of the request, NAVMCPUBHLTHCEN will provide a courtesy reminder by phone or e-mail to the requestor.

b. After receiving the technical documentation package, NAVMCPUBHLTHCEN will review it for completeness and notify the requesting agency and/or the manufacturer if additional information is needed. NAVMCPUBHLTHCEN may agree to begin a HHA without all of the documentation in special circumstances to expedite work or accommodate emergency situations. However, such exceptions will be approved only on a case-by-case basis. If NAVMCPUBHLTHCEN agrees to do a review with incomplete documentation, NAVMCPUBHLTHCEN will provide the sponsoring organization with an interim assessment letter that evaluates the information supplied and specifies what else NAVMCPUBHLTHCEN needs to complete the assessment.

6. Cancellation. If NAVMCPUBHLTHCEN does not have the manufacturer/supplier information within a work week from the 1 month deadline after receiving a request for HHA, NAVMCPUBHLTHCEN will send the requesting activity a letter of cancellation. If a letter of cancellation is received, the requesting activity may resubmit the HHA request after obtaining all required documentation.

7. Proprietary and Competition-Sensitive Information

a. When performing HHAs for the Navy, NAVMCPUBHLTHCEN strictly adheres to the Department of Navy requirements for handling information that is proprietary, competition sensitive, or sensitive business. That is, NAVMCPUBHLTHCEN will keep your information secure while it is reviewed and will destroy it by shredding when finished per SECNAV Manual 5239.1, *Department of the Navy Information Assurance Program,* and our internal instruction 5239.1D, *Information Systems Security (INFOSEC) Program*. NAVMCPUBHLTHCEN has secure storage areas, and staff members handling your information and have been properly trained and tested on security measures.

b. Your formulation is reviewed only to assess the potential health impacts of the chemical components. The proprietary ingredients will not be identified or discussed in the report by name, percent composition, or other specific identifiers. If it is necessary to address concerns about a proprietary ingredient, it will be referred to either by the general chemical class (e.g., amine, aldehyde, aromatic hydrocarbon, etc.) or simply as "a chemical in the proprietary portion of the product."

c. Proprietary information can be sent by postal mail or e-mailed directly to Head, Acquisition Technical Support using the delivery information given in paragraph 2 of this enclosure. Regardless of delivery method, please mark the package or e-mail subject line as "Proprietary Information FOUO" so it will be handled correctly upon arrival (FOUO is For Official Use Only).

d. NAVMCPUBHLTHCEN does not sign confidentiality or non-disclosure agreements or similar documents with manufacturers.

8. Required HHA Technical Documentation. Specific HHA Technical Documentation, usually supplied by the manufacturer, is required before a HHA will be initiated. Some items will be in separate documents (e.g., technical specification sheets, safety data sheets), while other items are supplied with the request letter or as a general product sheet (e.g., product application, usage amounts, or storage requirements). Note that some of the listed items will not apply to every product or material. For example, if no toxicity studies have been done on the product, mark the item “none” or “N/A.” For new materials, there will not be a Department of Defense (DoD) consumer. Items in the following list marked “[Required]” must be provided:

a. [*Required*] Technical point of contact at the manufacturer or company supplying the product (name, address, phone number, and email).

b. Technical points of contact in DoD who are major product users/consumers and who would be willing to provide information on application and experience with use of a product.

c. [*Required*] Complete description of the product, including model, part number, and any known trade names or synonyms. State whether the product is a reformulation, and if so, provide all identifying information for the previous product, including a copy of the HHA if applicable.

d. [*Required*] Description of intended product application and storage, including: amounts used; concentrations; application, use, and storage temperatures; cure times; dry times; and estimated number of uses per time (e.g., per work shift/day/week, etc.). Include any known “worst case” conditions.

e. [*Required*] Technical specification sheets. Sales literature can also be helpful if it fully describes use and handling of the product.

f. [*Required*] Current Safety Data Sheet (SDS) for the product. The SDS must contain all data elements required by the Hazard Communication Standard, 29 Code of Federal Regulations Parts 1910 and1200.

g. [*Required*] Complete product formula, including Chemical Abstract Service number. It is not acceptable to list generic ingredient names (e.g., "pigments – 45%"). Ingredients must total 100%.

h. [*Required*] Most current SDS for each ingredient, if applicable.

i. [*Required*] If the product is being evaluated for approval against a military specification, include results of required product testing or other verification that the specification has been met. For example, if the specification requires that products have "less than some amount" of volatile organic compounds (VOC), include results that show the total VOCs. HHA's on products that fail to meet required specification components will be terminated, and the HHA letter will explain the reason(s) for failure.

j. [*Required*] Copy of product label.

k. Copy of industrial hygiene or safety survey reports that address potential health hazards related to working with the material. Of interest is information pertaining to adverse health effects documented for manufacturer employees during research and development, manufacture, and/or packaging and handling.

l. [*Required*] Copy of any known toxicity study reports related to the product, its ingredients, or its pyrolysis products. Of particular interest are animal studies (laboratory) using the product or its pyrolysis products as the challenge agent(s). Providing the full reference citation to a study is an acceptable alternative.

m. [*Required*] Copy of reports addressing the product's decomposition products and their concentrations during/following fires or other intense heat scenarios. Reference citations for such reports are also acceptable.

n. Copy of standard operating procedures related to mixing, using, or applying the product.

o. Small samples of the product may be requested if off-gas testing is required. DO NOT send samples with the documentation unless specifically requested to do so.

9. For questions, contact the NAVMCPUBHLTHCEN, Industrial Hygiene Department, Acquisition Technical Support Division. Please direct all policy and requirement issues to Head, Acquisition Technical Support.

Head, Acquisition Technical Support Division
(757) 953-0736; DSN 377-0736
usn.hampton-roads.navmcpubhlthcenpors.list.nmcphc-HHA@mail.mil

10. How to request a HHA is also available on the NAVMCPUBHLTHCEN Web site at: http://www.med.navy.mil/sites/nmcphc/Documents/industrial-hygiene/REQUESTING-A-HEALTH-HAZARD-ASSESSMENT.pdf