

REQUESTING A HEALTH HAZARD ASSESSMENT (HHA) FROM THE NAVY AND MARINE CORPS PUBLIC HEALTH CENTER (NAVMCPUBHLTHCEN)

1. Send all requests, test results and documents to the NAVMCPUBHLTHCEN Industrial Hygiene Department. Request letters and supporting technical documentation are accepted in electronic and paper formats.

Electronic. Signed request letters from the Navy or Marine Corps sponsor and all supporting technical documents can be emailed to Head, Acquisition Technical Support Division at: usn.hampton-roads.navmcpubhlthcenpors.list.nmcphc-HHA@health.mil

Paper. Mail the information to:

Commander
Navy and Marine Corps Public Health Center
Industrial Hygiene - HHA
620 John Paul Jones Circle, Suite 1100
Portsmouth, VA 23708-2103

FAX. Fax the request or documentation to 757-953-0689. The fax cover sheet should be marked as Health Hazard Assessment (HHA) or Submarine Materials Review HHA.

Note: All Submarine Material Review HHA requests must come to NAVMCPUBHLTHCEN via Naval Sea Systems Command (NAVSEASYSKOM) 05Z42 (D. Champagne, david.e.champagne.civ@us.navy.mil). Submarine related HHA requests should be sent directly to NAVSEASYSKOM 05Z42 per the requirements of NAVSEA S9510-AB-ATM-010, Nuclear Powered Submarine Atmosphere Control Manual of 1 Oct 20 in order to begin the HHA process. After NAVMCPUBHLTHCEN completes the Submarine Materials Review HHA, the HHA will be sent to NAVSEASYSKOM 05Z42 for decision making and distribution to the original requestor.

2. The HHA request letter must come from the Navy or Marine Corps sponsoring organization. We do not perform independent product reviews and will not accept information directly from a supplier or manufacturer until we have the official request.

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

- a. Where will the product will be used (specific ship or general class of ship, whether it is an exterior space, and where: flight deck, etc. or an interior space, and where: tank, hangar bay etc.).
- b. How the product will be applied (for example, brush and roller painting vs. spray painting (type of spray painting, example plural system, compressed air, airless spray, HVLP, etc., mechanical means of application vs. adhesive use, Q-tip vs. syringe, etc.)
- c. Who will be applying the product (Navy civil service employees, ships' forces, contractors).

- d. The quantity of the product that will be applied.
- e. If there is a possibility of temperature change to the applied product, and if so, 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)
- f. Whether the product will be stored aboard a vessel, and if so, in what quantity.
- g. Frequency of operation applying the product (provide one of the following frequencies: 1. Daily, 2. Number of days per week, 3. Number of days per month, 4. Number of days per quarter, 5. Number of days per year).
- h. Duration of applying the product in a day (Choose one of the following: 1. Up to 15 minutes, 2. 15-30 minutes, 3. 30-60 minutes, 4. 1-2 hours, 5. 2-4 hours, 6. 4-6 hours, 7. 6-8 hours, 8. 8-10 hours, 9. More than 10 hours).

The technical documentation required in #6 is usually supplied by the manufacturer.

3. We do not start the review process until we have both the request letter and the required technical documentation. If the documentation is not received within one (1) month of the request, we provide a courtesy reminder by phone or email to the requestor. If we do not have the manufacturer/ supplier information, we will send the requesting activity a letter of cancellation.

The requesting activity can resubmit the HHA request after they have obtained all of the required documentation.

4. Once we have the technical documentation package, we review it for completeness and notify the requesting agency and/or the manufacturer if additional information is needed. We 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 NAVMCPUBHLHCEN agrees to do a review with incomplete documentation, we will provide the sponsoring organization with an interim assessment letter that evaluates the information supplied to us and specifies what else we need to complete the assessment.

5. Proprietary and Competition Sensitive Information

When performing HHAs for the Navy, we strictly adhere to the Department of Navy requirements for handling information that is proprietary, competition sensitive or sensitive business. We will keep your information secure while it is reviewed. We have secure storage areas/storage drives, and staff members handling your information have been trained on security measures.

The proprietary formulation will not be distributed to any other command or agency. 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 proprietary chemical of the product."

Proprietary information can be sent by postal mail or emailed directly to Head, Acquisition Technical Support using the delivery information given in paragraph 1 of this document. Regardless of delivery method, please mark the package or email subject line as "Proprietary Information" so it will be handled correctly upon arrival.

We do not sign confidentiality agreements or similar documents with manufacturers.

6. Following is the list of HHA Technical Documentation that is usually supplied by the manufacturer. Each item marked with an asterisk is required. Some items will be separate documents (e.g., technical specification sheets; safety data sheets), while other information can be supplied in the request letter or as a general product sheet (e.g., product application, usage amounts, or storage requirements). Note that some of these items will not apply to every product or material. For example, if no toxicity studies have been done on the product, mark item I as "none" or "N/A."

*a. 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 that are major product users/ consumers to provide application and use experience information.

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

*f. Current Safety Data Sheet (SDS) for the product. The SDS must contain all data elements required by the Hazard Communication Standard, 29 CFR 1910.1200.

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

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

*i. Copy of product label.

j. Copies 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.

*k. Copies 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). The full reference citation to the study is an acceptable alternative.

*l. Copies 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.

m. Copies of standard operating procedures (SOPs) related to mixing, using, or applying the product.

n. Small samples of the product may be requested if off-gas testing is required (Submarine Materials Review HHA only). DO NOT send samples with the documentation. You will be contacted by NAVSEASYS COM 05Z42 if off-gas testing is required.

7. If you have any questions, contact the Navy and Marine Corps Public Health Center, Industrial Hygiene Department, Acquisition Technical Support Division. Please direct all communications to Head, Acquisition Technical Support Division.

Head, Acquisition Technical Support Division
(757) 953-0725; DSN 377-0725
usn.hampton-roads.navmcpubhlthcenpors.list.nmcphc-HHA@health.mil