REQUESTING AN OCCUPATIONAL HEALTH HAZARD ASSESSMENT (HHA) FROM THE NAVY AND MARINE CORPS FORCE HEALTH PROTECTION COMMAND (NMCFHPC)

June 2023

Background: BUMEDINST 6270.8C, Occupational Health Hazard Assessments of 31 May 17, implements the Navy and Marine Corps HHA program. The HHA program supports defense acquisition programs via an integrated effort with a focus to reduce occupational health hazard risks throughout the life cycle of materiel. 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. Navy Medicine provides this service for submarines, surface vessels, aircraft, and shore activities to assist with maintaining operational readiness, capabilities, and performance.

To Request an HHA:

Send all requests, test results and documents to the NMCFHPC 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 Force Health Protection Command
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 NMCFHPC via Naval Sea Systems Command (NAVSEASYSCOM) 05Z42**. Submarine related HHA requests should be sent directly to NAVSEASYSCOM 05Z42 (D. Champagne, david.e.champagne.civ@us.navy.mil) 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 NMCFHPC completes the Submarine Materials Review HHA, the HHA will be sent to NAVSEASYSCOM 05Z42 for decision making and distribution to the original requestor.

Request Letters

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.

For weapons HHA requests, the request letter must provide detailed usage of the weapon; information regarding industrial hygiene sample results in the form of toxic gases, impulse noise, and blast overpressure; and relevant DoD reports. For more detailed information on weapons HHAs requirements, please contact usn.hampton-roads.navmcpubhlthcenpors.list.nmcphc-HHA@health.mil.

For HHA requests that do not relate to weapons systems, 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 for all HHAs (excluding weapons HHAs, see paragraph b for weapons HHA information), if applicable:

- Where will the product 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.).
- 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.)
- Who will be applying the product (Navy civil service employees, ships' forces, contractors).
- The quantity of the product that will be applied.

- 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)
- Whether the product will be stored aboard a vessel, and if so, in what quantity.
- 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).
- 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).

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.

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 NMCFHPC 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.

Handling of Proprietary or Business Sensitive Information

When performing HHAs for the Navy and Marine Corps, NMCFHPC strictly adheres to the Department of Defense and Department of Navy requirements for handling information that is proprietary, competition sensitive or business sensitive. This information is treated as Controlled Unclassified Information (CUI) and is handled as such. More information regarding CUI can be found here: www.dodcui.mil.

The proprietary formulation will not be distributed to any other command or agency. The proprietary 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."

NMCFHPC does not sign confidentiality agreements or similar documents with manufacturers.

Required Manufacturer or Supplier Technical Documentation

- Technical point of contact at the manufacturer or company supplying the product (name, address, phone number, and email).
- Technical points of contact from the government sponsoring organization that are major product users/ consumers to provide application and use experience information.
- 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.
- 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. Note: to properly assess the potential health hazard impact of products according to their intended use the details indicated in this section should leave no assumptions.
- Technical specification and, or material specification sheets. Sales literature can also be helpful if it fully describes use and handling of the product.
- 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.
- 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%.
- Most current SDS for each ingredient (raw material), if applicable.
- Copy of product label.

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

- Copies of any known toxicity study reports related to the product, its ingredients, or its pyrolysis products, if available. 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.

- Copies of reports addressing the product's decomposition products and their concentrations during or following fires or other intense heat scenarios (high temperature use), if available. Reference citations for such reports are also acceptable.

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

Contact the HHA Team

If you have any questions, contact the Navy and Marine Corps Force Health Protection Command, 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