

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

To ensure that we can access and track HHA requests, we ask our customers and partners to send their requests, test results and documents through the NAVMCPUBHLTHCEN Industrial Hygiene Department. If your requests are routinely worked by a specific staff member, feel free to copy that person on emails, but send the request letter to Head, Acquisition Technical Support Division. We accept requests and technical documentation in electronic or paper format. Contact information is listed at the end of this document.

We do not perform “independent” product reviews and will not accept information directly from a supplier or manufacturer without a valid request from a Navy or Marine Corps sponsoring organization. In order to do an HHA, we require certain technical information from the manufacturer, supplier, and/or requesting command.

We do not start the HHA process until we receive both the request letter and the required documentation. If the documentation is not received within one (1) month of the request, we notify the requestor by email that the package is incomplete and the HHA request is considered cancelled. Request letters can be resubmitted when you get the required documents. We made this change to our process because we can no longer absorb the time required to repeatedly contact manufacturers to send or complete their product packages. Our job is to conduct the assessment, not to assemble the package to be reviewed.

Once we have the technical documentation package, we review it for completeness and notify the requesting agency if additional information is needed. Exceptions will be allowed under some conditions to expedite work or accommodate emergency situations, but must be approved on a case-by-case basis. If we agree to do a review with incomplete documentation to help you in processing the product, we provide you with an interim assessment letter that evaluates information supplied to date and specifies what else we need to complete the HHA and provide the final assessment.

Following is the master list of technical documentation for HHAs. Each item marked with an asterisk is required. Some items will be separate documents (e.g., technical specification sheets; material safety data sheets), while other information may 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 #12 as “none” or “NA.”

### HHA Technical Documentation

- \*1. Technical point of contact at the manufacturer or company supplying the product (name, address, phone number, and email).
2. Technical points of contact in DoD that are major product users/ consumers (for application and use experience information).

- \*3. 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.
- \*4. 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.
- \*5. Technical specification sheets. Sales literature may also be helpful if it fully describes use and handling of the product.
- \*6. Most current Material Safety Data Sheet (MSDS) for the product. The MSDS must contain all data elements required by the Hazard Communication Standard, 29 CFR 1910.1200.
- \*7. 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%.
- \*8. Most current MSDS for each ingredient, if applicable.
- \*9. If the product is being evaluated for approval against a military specification, include results of required product testing or verification that the specification has already been met. For example, if the specification requires that products have “less than some amount” of volatile organic compounds (VOCs), include results that show the total VOCs. If the product does not meet the specification, the HHA will not be done, and we will send a letter stating this.
- \*10. Copy of product label.
- 11. 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.
- \*12. 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.
- \*13. Copies (or reference citations) of reports addressing the product’s decomposition products and their concentrations during/ following fires or other intense heat scenarios.
- 14. Copies of standard operating procedures (SOPs) related to mixing, using, or applying the product.

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

If you have any questions, please contact the Navy and Marine Corps Public Health Center, Industrial Hygiene Department, Acquisition Technical Support Division. Note that all policy and requirements issues should be addressed to the Division Head.

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This is the Industrial Hygiene fax machine. Fax cover sheets need only be marked Health Hazard Assessment (HHA) or Submarine Materials Review.