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CERTIFIED MAIL RETURN RECEIPT REQUESTED

FEB 14 1994

North Carolina Department of Environment,
Health, and Natural Resources
Attn: Mr. Patrick Watters
P.O. Box 27687
401 Oberlin Road
Raleigh, North Carolina 27611

Re: MCB Camp Lejeune; Draft Final Remedial Investigation/Feasibility Study Health and Safety Plan, Sampling and Analysis Plan, and Work Plan for Operable Unit No. 4

Dear Mr. Watters:

Responses to the comments on the referenced plans are enclosed as Attachment A. The responses have been incorporated into the final plans for Operable Unit No. 4.

The LANTNAVFACENGCOM point of contact for this project is Ms. L. G. Berry, who may be reached at (804) 322-4793.

Sincerely,

L. A. BOUCHER, P.E.
Section Head
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Enclosures

Copy to:
U. S. EPA (Gena Townsend)
MCB Camp Lejeune (Mr. Neal Paul)

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Attachment A
Response to Comments,
Draft Final RI/FS Project Plans for
Operable Unit No. 4
MCB Camp Lejeune, North Carolina

**Response to Comments on the Draft Final**
**Remedial Investigation/Feasibility Study Work Plan**
**for Operable Unit No. 4**
**MCB Camp Lejeune, North Carolina**

**Submitted by State of North Carolina Department of Environment,**
**Health and Natural Resources, Division of Solid Waste Management**
**Letter Dated November 5, 1993**

**Response to Comments**

1. Site 41 has been added to Sections 5.5, 5.6, and 5.8.

2. Section 5.6.1.3, page 5–39; The phrase "chemical surety species" has been revised to read "chemical surety degradation compounds."

3. Section 5.6.1.4, page 5–40; A bullet has been added to the Groundwater Exposure Scenario for a dermal exposure route which will include the same receptors as included in the bullet above on page 5–40.

**Response to Comments on the Draft Final Remedial Investigation/Feasibility Study Sampling and Analysis Plan and Health and Safety Plan for Operable Unit No. 4 MCB Camp Lejeune, North Carolina**

**Submitted by the United States Environmental Protection Agency Letter Dated November 1, 1993**

**Response to Comments**

1. Please note that test borings have been included as the method for obtaining soil samples at Site 74 in lieu of test pitting. The reason for this change is that test pitting will require extraordinary field measures due to the potential presence of chemical surety agents. This change was made in response to comments submitted by the U.S. Army Chemical Surety Materiel Agency. Obtaining soil samples via test borings is not considered as "intrusive" measures by the U.S. Army. Intrusive measures such as test pitting will require special review of the Project Plans by the U.S. Army. Specifically, in the event that chemical agents are uncovered via test pitting, measures would need to be taken by the U.S. Army for handling the drums and evacuating the area. LANTDIV has decided that the collection of soil samples via test borings is suitable for characterizing the nature and extent of soil contamination at Site 74. Please note this change in the Final Project Plans.

**Response to Comments on the Draft Final Remedial Investigation/Feasibility Study Work Plan, Sampling and Analysis Plan, and Health and Safety Plan for Operable Unit No. 4 MCB Camp Lejeune, North Carolina**

**Submitted by MCB Camp Lejeune, Environmental Management Division Telefax Dated November 4, 1993**

**Response to Comments on the Draft Final Work Plan**

1. Section 2.1.1, 7th paragraph, 1st sentence, page 2-4; The sentence now reads "...either Hadnot Point, MCAS New River, or the Camp Geiger area.".

2. Section 2.1.1, 7th paragraph, 7th sentence, page 2-4; The phrase "Intracoastal Waterway" has been revised to read "Onslow Bay".

3. Figure 2-4 has been revised to show the correct boundaries.

4. Section 2.2.3, 5th paragraph, page 2-23; This paragraph has been revised to indicate that only an explosion occurred during waste disposal activities. The discussion of a forest fire and exploding drums have been deleted based on conversations with Camp Lejeune EMD. EMD has indicated that the story regarding the forest fire is more heresy than fact, based on discussions with the Base fire marshall.

5. Figures 2-8 and 2-9 have been revised.

6. Section 3.3.1, 3rd paragraph, page 3-16; The phrase "...105mm cannon..." has been revised to read "...105mm howitzer...".

7. Section 5.3.1.4, 2nd paragraph, 3rd sentence, page 5-10; The phrase "It is estimate..." has been revised to read "It is estimated...".

**Response to Comments on the Draft Final Health and Safety Plan**

1. Figure 3-1 has been revised, changing River Drive to Main Service Road.

2. Section 3.1.2, 6th paragraph, page 3-4; This paragraph has been revised (see response No. 4 above).

**Response to Comments on the Draft Final Sampling and Analysis Plan**

1. Section 1.1.1.4, 2nd paragraph, 1st sentence, page 1-4; The text was from a USGS report of MCB Camp Lejeune. This report states that the seven aquifers are separated by confining layers. A sentence will be added that states there is a potential semiconfining layer between the Castle Hayne and Beaufort aquifers. In addition, the surficial and Castle Hayne aquifer are interconnected, based on existing studies conducted by Baker.

2. Section 1.1.1.4, 2nd paragraph, 4th sentence, page 1-4; This sentence will not be revised since there are both confining layers and semiconfining layers.

3. Figure 1–5 has been revised.

4. Section 1.1.2.3, page 1–14; This paragraph has been revised (see response No. 4 above).

5. Section 1.1.2.4, 2nd paragraph, 2nd sentence, page 1–14; Deleted "s" from the word "toward".

6. Section 1.1.4.2, page 1–19; Deleted "s" from the word "toward".

7. Section 1.1.4.3, page 1–19; Deleted the last sentence from the paragraph.

**Response to Comments on the Draft Final Remedial Investigation/Feasibility Study Work Plan, Sampling and Analysis Plan, and Health and Safety Plan for Operable Unit No. 4 MCB Camp Lejeune, North Carolina**

**Submitted by Dept of the Navy, NEHC, Health Risk Assessment Div Letter Dated November 9, 1993**

## Response to General Comments on the Draft Final Work Plan

1. No response required.

2. No response required.

3. A general description of the risk assessment scope of work is given in Section 5.6 of the Work Plan. RI/FS Work Plans do not normally include a "risk assessment" section (see EPA OSWER Directive 9355.3-01). However, RI/FS Work Plans should include a discussion of preliminary contaminant migration and exposure pathways as well as a conceptual model of the site. The RI/FS Project Plans do include this information.

4. No response required.

## Response to Specific Comments on the Draft Final Work Plan

1.a. Section 2.2.5.5, page 2-36;

The report in which this information was obtained did indicate that acetone is a common laboratory contaminant. Acetone was deleted in the report as a potential contaminant of concern (PCOC) since it is likely present due to lab contamination. Chloromethane, however, was included as a PCOC in the background document.

1.b. Section 2.2.5.5 of the Work Plan and Section 1.2.3 of the Sampling and Analysis Plan;

The inorganic sampling results for oyster and mussel tissue have been included in the work plan. This information was not presented in the Sampling and Analysis Plan (SAP). The SAP is being streamlined to eliminate repetitive information that is already included in the Work Plan. Streamlining the RI/FS Project Plans has been agreed to with the EPA and North Carolina DEHNR.

1.c. Section 1.2.3 of the Sampling and Analysis Plan;

The statement "Therefore, no additional studies are required to evaluate aquatic life." has been deleted. A sentence has been added that states "The technical analyses of the results of the chemical analyses is in progress."

2.a. Section 3.1.2, page 3-2;

Hunting is not permitted in this area as it is a training area for military personnel only.

Section 5.6.1, page 5-40;

Added a sentence "Hunting is not permitted in this area therefore hunters are not recognized as a potential pathway."

2.b. No hunting occurs in this area.

3.a. Section 3.1.2, page 3-2;

For Exposure Pathways changed first bullet to read "Human exposure by military personnel working inside the area due to dermal contact or incidental ingestion of surface soil and standing water (currently, access to the area is restricted by a fence)." Added a second bullet that states "Human exposure by military personnel outside the fenced area due to dermal contact or incidental ingestion of surface soil and standing water as a result of runoff from the site."

3.b. Section 3.1.3, page 3-2;

Changed the second sentence to read "Military personnel have been identified as the probable human receptors.

4.a. Section 4.2.2, page 4-7;

The paragraph has been deleted since it was determined to be confusing and unnecessary.

4.b. Soil at Site 74 was disturbed as a result of trenching (see aerial photographs in Appendix A of the Work Plan). Although trenching occurred at Site 74, evaluation of current onsite surficial soil quality is warranted.

4.c Surface soil samples are proposed for determining potential human health and ecological impacts.

5.a. Section 5.3.1.4, page 5-12 and Section 5.3.2.3, page 5-16;

Changed sampling depth from 0 to 6 inches to 0 to 12 inches, or shallowest depth possible in order to accurately reflect the potential surface soil exposure pathway according to Region 4 EPA guidance. The surface soil samples are being collected in accordance with EPA Region IV guidance.

5.b. No response required.

5 c
No response required.

6.a. Section 5.6.1.2, page 5-38; Changed sample detection limit to sample quantitation limit (SQL). Also added to the text a further qualifier, "If SQLs cannot be obtained, then use onehalf the CRQL, MDL, or IDL, in that order, with caution provided the number of

non-detects is not greater than 10 to 15 percent of the data. The substituted values on the data summary tables will be clearly defined."

6.b. No response required.

7.a. & b Section 5.6.1.4, page 5-40 of the Work Plan and Table 7-1 of the Sampling and Analysis Plan;

OVA headspace readings from the soil samples and HNu readings from split spoon and borehole will detect the presence of volatile organic compounds (VOCs). Given that the wastes are buried and not open to ambient air conditions, air sampling (for specific PCOC) is not recommended since it is unlikely that VOCs from either buried wastes or groundwater would be detected in ambient air.

8 . a . , b . , & c . Section 5.6.1.4, page 5-40;

Current and future potential exposure scenarios baseline risk assessment, future land use scenarios will assume that the area will be used for residential development as recommended in EPA Region IV guidance. However, based on the latest Master Plan for MCB Camp Lejeune, there are no planned changes regarding use of the three site areas.

9 . a . & b . Section 5.6.1, page 5-35 thru 5-37;

The information requested in the comments is addressed by indicating that the risk assessment will be performed in accordance with EPA guidance. All of the information requested in the comment will be included in the human health risk assessment. If NEHC is concerned with what will be included in the risk assessment, please review ongoing risk assessment reports. Several reports have been completed to date and approved by EPA. The DON is attempting to streamline the already complex Work Plan. The information requested in the comment is excessive and not necessary for developing a work plan. Site-specific information will be presented in the Baseline Risk Assessment Report.

9.c. Section 2.1.9; Section 2.2, 2.3, and 2.4;

Now include information on site-specific demographic information. For your information, there are no sensitive human populations in close proximity to the site. This is apparent in Section 2.0 of the Work Plan (see Site Location and Setting).

10.a.- e. Section 5.6.1, page 5-37 thru 5-44;

The specific information requested in the comment is excessive and unnecessary for inclusion in the Work Plan. The human health risk assessment will include all of the information requested in comments b, c, and d. Tables may or may not be prepared to the exact format given in RAGs. Please remember that RAGs is a guidance document, not a specification.

**Response to Specific Comments on the Draft Final Sampling and Analysis Plan**

11. Section 1.1.4.3, page 1-19;

The M256 kit was disposed of on the surface of Site 69, but due to background information it is not believed that this kit was buried on site. The chemicals contained in the M256 kit are not of concern. The potential concern are the drums contents that potentially contain chemical agents, which reportedly were buried at Site 69. The drums themselves may contain chemical agent training kits, which contain small doses of mustard or blister agents. There is the potential that some of these drums were also buried at Sites 41 and 74.

**Response to Comments on the Draft Final Health and Safety Plan for Operable Unit No. 4**

**Submitted by Dept of the Navy, NEHC, Health Risk Assessment Div Letter Dated November 2, 1993**

**Response to General Comments**

1. No response required.

2. No response required.

3. No response required.

4. The Health and Safety Plan complies with references "a and b" of the comment letter.

5. No response required.

**Response to Specific Comments**

1. The organization of this section presents the site background, site work plans, and the hazard evaluation for each task as opposed to each site. The format is usable and has been used with several other health and safety plans developed for MCB Camp Lejeune. This section is in compliance with 29 CFR 1910.120(b)(4)(ii) and the Navy/Marine Corps IR Manual (neither regulation/guidance manual is specific with how information is to be presented in the plan). The time required to reorganize this section to the approval of the reviewer is not cost effective or necessary.

a

The potential physical hazard for contact with unexploded ordnance (UXO) will be included with the monitoring well installation as part of the final Health and Safety Plan (HASP). Test/Pit Trenching has been eliminated from site activities. Test borings will be augered in place of trenching at Site 74.

b

Section 3.3.2 identifies Table 3-1 as providing a list of chemicals that may be present on the sites. The table includes specific toxicological information regarding these chemicals. Additional information regarding the chemicals is referenced to Appendix B, which contains an individual material safety data sheet (MSDS) for each chemical of potential concern. A statement will be added to the Final HASP to clarify this point.

c

The UXO subcontractor will be present with the work crews during work activities at the sites. A statement to this effect will be included within Section 3.3.3.3 to clarify this point.

d

Thermal Stress Standard Operating Procedure (SOP) – The Baker SOPs for cold stress and heat stress are in Appendix A. There may be a potential for either heat or cold stress because of the various levels of protection and the time of year the project is to take place.

e

Section 3.3.3.7, "Confined Space Entry" – Confined space entry is not anticipated for the

work tasks planned for this project. Test/Pit Trenching has been eliminated from site activities.

f

Section 3.3.4 radioactivity – The reference to work stoppage at 1 mR/hour in Section 3.3.4 has been removed. Section 5.0 contains the information regarding air monitoring work stoppage circumstances.

2. Section 4.0, "Site Control"; Specific site descriptions, site maps, and detailed site-specific safe work practices have been included in the Final HASP.

3. Section 5.0, Environmental Monitoring

a

The protection levels in use will protect for semivolatiles. The pesticides are not an inhalation concern because previous experience indicates that conducting this type of project during the winter months maintains moist soil and the limited amount of soil intrusive activities prevents significant dust generation. In addition, the personal protective equipment (PPE), decontamination procedures, and personnel hygiene prevents a pesticide concern from ingestion or skin contact.

The OSHA Time-Weighted Average (TWA)exposure standards are used as a reference to help evaluate the health hazards of the chemicals of concern that could potentially be at a site. The nonspecific real-time air monitoring that will be conducted as part of this project is more conservative than the OSHA TWAs.

b

Past experience with the drill rig operations does not warrant a requirement for noise monitoring.

c

The colormetric tubes which will be available on site include:
-benzene
-vinyl chloride
-methylene chloride
-carbon disulfide

d

A more detailed description of the Minicam will be included in Section 5.0 of the final HASP.

e

Since radiation is not a concern at the site, film badge monitoring of the personnel will not be used. The use of a radiation meter will be available for screening.

f

TEU is defined as the Technical Escort Unit.

g

The monitoring instruments will be calibrated before and after use and will be stated as such in Section 5.4 of the Final HASP.

4. a

The chemical-resistant clothing will be identified as Saranex in the text of the report.

b
Test/Pit Trenching has been eliminated from site activities.

c
The air line respirator system will use air cylinders.

d
The MSA M-17 respirator will be eliminated from the HASP. Discussions will be made with the assistance of the TEU to determine the appropriate protection level.

e
A work mission duration for each protection level will be included in Section 6.0.

f
Specific inspection procedures for PPE is located in Appendix A, Section 3.0 of the Baker SOPs.

5. The new telephone area code at MCB Camp Lejeune will replace the previous base emergency telephone numbers on the emergency telephone numbers list. The Agency for Toxic Substances and Disease Registry (ATSDR) phone number is on the emergency telephone numbers list.

6. The base hospital had been contacted and their capabilities determined for chemical exposure concerns. Section 8.0 of the Final HASP will include verbiage to convey that the base hospital will be the emergency center for chemical exposures. Technical information of the potential chemical hazards are again confirmed with the hospital during mobilization. Figure 8-1, Hospital Routes, has been revised. Page 8-11 describes the portable emergency eye wash station which contains an approximate 15-minute supply of water. Section 8.0 is based on OSHA 29 CFR 1910.120(l), Emergency response by employees at uncontrolled hazardous waste sites.

7. A statement will be added to Section 9.0 to state that training certificates will be collected and reviewed to assure they are current. Additionally, special Army referenced first aid procedures and appropriate trained personnel are being investigated.

8. A statement is included in this section that indicates that the occupational medical physician is provided information to base the medical surveillance examinations.

9. Appendix A, "Baker SOPs.

a
The Baker Hearing Conservation Program is not necessary for inclusion with this HASP. Trenching has been eliminated from site activities and heavy equipment procedures will be included in Section 4.5.

b
Non-prescription drugs has been included in the statement in Section 4.2, "Site Precautions".

10. Appendix B, "Material Safety Data Sheets (MSDS)" Carbon disulfide and ethylene dibromide (1,2-Dibromoethane) are included on Table 3-1, that is why MSDSs are located in this Appendix for these chemicals.

11. Bloodborne Pathogen Program – A statement will be included in Section 10.0 of the Final

HASP that pertains to 29 CFR 1910.1030(f).

**Response to Comments on the Draft Final Remedial Investigation/Feasibility Study Work Plan, Sampling and Analysis Plan, and Health and Safety Plan for Operable Unit No. 4 MCB Camp Lejeune, North Carolina**

**Submitted by State of North Carolina, Department of Environment, Health and Natural Resources Letter Dated November 1, 1993**

**Response to General Comments on the Draft Final Work Plan and Sampling and Analysis Plan**

The DON and their contractor agree that the Project Plans need to be streamlined in order to eliminate unnecessary duplication. Unfortunately, the duplication of certain information was a result of comments received in the past from various reviewers. Nevertheless, the project plans have been revised for consistency. Future submittals of Project Plans will likely take a slightly different format in order to reduce the amount of repetitive information. Specifically, the site background information, discussion of Data Quality Objectives, and transport/migration pathways will likely be eliminated from the Sampling and Analysis Plan and presented only in the Work Plan.

**Response to Specific Comments on the Draft Final Work Plan**

1. Section 2.2.5, pages 2–27 thru 2–36;
   The contaminant levels will be identified.

2. Section 2.3.5.2, page 2–44; the last two sentences have been deleted in avoid confusion. For your information, monitoring well 74GW3 has never been found and is likely destroyed.

3. Section 2.4.4 and 2.4.5.1, page 2–51; Monitoring Well 41GW5 has been added to Figure 2–14.

4. Section 2.4.4, page 2–51; Figure 2–14 has been revised to indicate the "estimated direction of shallow groundwater flow." The text has been revised to indicate that shallow groundwater flow may be radially from the site based on the topography of the study area.

5. Section 3.3.6.2, page 3–20; The phrase "...cannot be assessed due to the lack of samples." has been added to the end of the second sentence.

6. Section 4.2, page 4–6; The wording of the objective has been modified.

7. Section 4.2.2, page 4–8; The sentence has been modified to read "Estimate the future effects of buried disposal materials on the use of Site 74 for military operations."

8. Section 4.2.3, page 4–8; Section 4.2.3 has been revised.

9. Section 4.3.1, page 4–10; The sentence has been modified to read "The above three objectives...".

10. Section 5.3.2.3, page 5–19; Deleted "visual" from the sentence.

11. Section 5.3.3.4, pages 5–24 and 5–25; The correct depth of the UXO system is 5.0 meters

not 0.5 meters.

12. Section 5.5 thru 5.8, pages 5-35 thru 5-51; Site 41 has been included in Sections 5.5, 5.6, and 5.8.

**Response to Specific Comments on the Draft Final Sampling and Analysis Plan**

13. Section 1.0 and 1.1, page 1-1; Changed reference to 1993.

14. Section 1.2.3, page 1-22; The sentence has been restructured.

15. Section 1.2.3, page 1-23; Added a discussion on surface water and aquatic life or explained why it was omitted in the Work Plan.

16. Section 2.2, page 2-5; Added sampling restrictions as in the Work Plan.

17. Section 3.2.3, page 3-15; Four background samples will be obtained.

18. Section 3.2.3, page 3-16; Deleted "visual" from the sentence.

19. Section 3.3.6, page 3-29; The reference to the specific section in the plan has been added.

**Response to Comments on the Draft Final Remedial Investigation/Feasibility Study Health and Safety Plan for Operable Unit No. 4 MCB Camp Lejeune, North Carolina**

**Submitted by State of North Carolina, Department of Environment, Health and Natural Resources Letter Dated October 14, 1993**

**Response to Comments on the Draft Final Health and Safety Plan**

1. Section 5.2, third sentence, page 5-1; The sentence has been restructured for better clarity.

2. Section 5.2, page 5-1; The Minicam (Model FM-3000) is designed to detect chemical warfare agents and simulants. This is a general statement about the capabilities of the monitoring instrument and not to suggest that chemical warfare simulants are expected to be detected during this project. See response to comment number 3, for further information.

3. Section 5.2, page 5-1; The Minicam Model FM-3000 is manufactured by:

   CMS Research Corporation
   200 Chase Park South, Suite 100
   Birmingham, Alabama 35244
   Telephone: 205-733-6911

   This instrument has been designed for the detection of chemical agents and simulants. The Minicam's specification include the detection of mustard gas at the Surgeon General's 8-hour, TWA concentration of 0.003 $mg/m^3$. Additional information has been included in Section 5.1 of the Final HASP regarding the capabilities of the Minicam.

4. Section 5.2, page 5-1; The term meter units (mu) will be substituted for references to parts per million (ppm) when describing HNu air monitoring readings.

5. The protection level for this project is designed to protect against chemical warfare agents. Protection against these agents will provide adequate protection against the other potential chemicals of concern.

   Based on the extreme conservative breathing zone air monitoring results that would trigger protection upgrades or work stoppage and the above information, the protection levels designated are adequate.

6. Section 5.2, page 5-1; Section 5.1, Point Source Monitoring refers to air monitoring performed at the source of the sampling/investigative activity. Sampling/investigative activity refers to the various site work areas, i.e., bore hole opening, monitoring well opening, etc. This is designed to have air monitoring conducted in all areas of potential concern and not just breathing zone areas.

7. Section 5.2, page 5-2; This radiation meter has two separate probes. The external probe is the Scintillator tube which has a setting for milliroentgen (mR) per hour scale. This probe

is used for higher energy gamma sources. Whereas, the GM Pancake internal probe is a different probe used with a separate setting on the instrument. The internal probe measures beta and lower energy gamma and registers as counts per minute. This has been clarified in the HASP.

8. Section 6.1, page 6–1; The table on page 6–1 does not require gloves to be used with Level D protection; however, gloves will be indicated as available for site personnel if desired. The asterisk next to gloves under Level D contamination on page 7–1 is footnoted at the bottom of the table to clarify that certain PPE items may not always be worn with this protection level.

**Response to Comments on the Draft Final Remedial Investigation/Feasibility Study Health and Safety Plan for Operable Unit No. 4 MCB Camp Lejeune, North Carolina**

**Submitted by State of North Carolina, Department of Environment, Health and Natural Resources Letter Dated September 20, 1993**

**Response to Water Quality Section Comments on the Draft Final Work Plan**

Groundwater testing results will be reviewed with the Publicly Owned Treatment Works (POTW) operator and if acceptable, the purge water will be discharged into the POTW. The criteria for disposal of purge water/development water to the POTW will be if the contaminant levels are below State or Federal drinking water standards. In addition, if the operator feels that the contaminant levels may pose an operational problem, then the POTW will not be utilized. If the water is not accepted at the POTW, the water will be disposed of in accordance with Federal or State requirements.

With respect to intrusive investigations around the actual disposal area at Site 69, the current scope of work should be adequate to assess current and future human health and environmental risks, and develop remedial alternatives, if necessary.

**Response to Air Quality Section Comments on the Draft Final Work Plan**

No response is required.

**Response to Groundwater Section Comments on the Draft Final Work Plan**

No response is required.

**Response to Comments on the Draft Final Remedial Investigation/Feasibility Study Work Plan, Sampling and Analysis Plan, and Health and Safety Plan for Operable Unit No. 4 MCB Camp Lejeune, North Carolina**

**Submitted by Colonel Louis M. Jackson Program Manager for Non-Stockpile Chemical Material Telefax Dated November 9, 1993**

Table 5-1 and Secstion 2.2.3 have been revised. There are no suspected nerve agents at the site.

Section 5.0 of the HASP is being revised to specify the monitoring parameters of each monitoring equipment. The TEU will be requested to assist in this monitoring.

The medical treatment portion of the Final HASP is being revised to include additional medical support requirements for non-stockpile chemical material activities through the assistance from the TEU.

The HASP will include an appendix that will provide the summary information on the Chemical Agent Identification Sets (CAIS), including color copies of the photographs and MSDSs for the CAIS chemicals.

The base hospital has been contacted and they indicated that they are capable of handling chemical warfare agent type exposures. Chemical agent/medical training for project personnel is being reviewed to acquire additional information of locations and dates of any such training classes.

Reference to the M17 Army Mask will be removed from the HASP.

Test borings will be conducted at Site 74 in lieu of trenching.

CSM degradation products will be analyzed for at Site 41.

A chemical agent test kit was located on the surface of the site. There is no background information that suggests that these kits have been buried in this area. These test kits are not expected to be a concern during sampling procedures.