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CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Jack Butler
North Carolina Department of Environment,
Health, and Natural Resources
Post Office Box 27687
401 Oberlin Road
Raleigh, North Carolina 27611

Re: MCB Camp Lejeune; Responses to North Carolina DEHNR
Comments on the Draft Final RI/FS Health and Safety Plans
for Sites 6, 9, 48, and 69

Dear Mr. Butler:

We have received the North Carolina Department of Environment,
Health, and Natural Resources comments (letter dated May 6, 1992
received in our office May 11, 1992) to the subject draft
documents. The Navy/Marine Corps' responses to these comments
are enclosed.

Final versions of the subject documents have been forwarded under
separate correspondence.

Any questions concerning these responses should be directed to
Mr. Byron Brant at (804)-445-2931.

Sincerely,

P. A. RAKOWSKI, P.E.
Head
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Enclosure: Response to Comments Submitted by the North Carolina
Superfund Section Letter Dated May 6, 1992

Copy to:
EPA Region IV (Ms. Michelle Glenn)
MCB Camp Lejeune (Mr. George Radford)
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RESPONSE TO COMMENTS SUBMITTED BY THE
NORTH CAROLINA SUPERFUND SECTION
LETTER DATED MAY 6, 1992

The Navy/Marine Corps' responses to the North Carolina Superfund Section recommendations concerning the RI/FS HASP for Sites 6, 9, 48, and 69 are listed below. The responses coincide with the recommendations presented.

1. Page 3 (formerly Page 1), Section 1.3

"Medically certified" was changed to read "deemed medically fit by a qualified physician to perform the tasks required".

2. Page 4 (formerly Page 3), last line of first paragraph

Level D protection is addressed in the 40-hour training, however, in the context of this statement, the reference pertains to practical field exercises for Levels A, B, and C with regard to donning, doffing, and working in PPE ensembles.

3. Page 35 (formerly page 34), under HNu/OVA

The cartridges selected during Level C activities for sites 6, 9, 48, and 69 represent the most comprehensive combinations available (e.g. organic vapor/acid gas/HEPA for various organic compounds, metals, and particulate; and, a Mercury Vapor/HEPA filter cartridge with a colorimetric end-of-life indicator for mercury vapor and particulate) based on the results of existing chemical data. For investigative activities that present a high potential for elevated exposure concentrations, Level B protection has been selected. Refer to Section 6.2 for a list of chemicals detected during preliminary monitoring, Section 7.2 for levels of respiratory protection, and Section 11.2 for air monitoring action levels.

4. Page 36 (formerly page 34) under Drager Tubes and Page 37 (formerly page 39)

The polytest drager tube provides a qualitative indication after five pump strokes as to the presence of essentially 15 hazardous constituents. The color of the tube begins as white, and depending on the chemical(s) present, will change color to brown, green or violet (instructions are provided in the Drager tube box). It was originally intended as an aid in determining the presence of previously identified constituents (i.e., acetone, carbon disulfide, monostyrene (styrene), perchlorethylene, toluene/xylene) however, after further consideration, the tubes are no longer proposed for use.

5. Page 35 (formerly page 34), Combustible Gas Meter (CGM)

The HASP was modified to allow for continuous CGM monitoring when in the range of 10% to 20% of the lower explosive limit (LEL), and higher.

6. Page 36 (formerly page 39), Drum Sampling

Since drum sampling will be performed in Level B protection, the Hnu/OVA air monitoring for each drum will be performed initially, and periodically thereafter (as specified in the HASP). This is considered sufficient Hnu/OVA monitoring.

7. Page 36 (formerly page 39)

The HASP was modified to provide for Combustible Gas monitoring during groundwater sampling.

8. Page 38 (formerly page 41)

Mercury vapor badges are required for activities performed in Levels D, and D+. The monitoring well installation and soil boring-sampling will be performed in Level C using respiratory cartridges that have end of service life indicators. Therefore, mercury vapor badges will not be worn during Level C operations.

9. Page 39 (formerly page 42), footnote 2

The statement was modified to read; "The meter will be held at the survey location for 9 seconds for a complete meter response".

10. Page 40 (formerly page 43), Radiation Survey Meter

Levels C and B personal protective equipment (PPE) offer the same degree of protective covering, and a different level of respiratory protection. Using a 1 milliroentgen per hour (mR/hr) action level (a qualitative value for alpha and beta activity) for leaving the area, either protection level (both offering shielding) should be sufficient for protection. For a gamma source neither protective level would be sufficient. However, with an action level of 1 mR/hr to commence leaving the area (reducing time and increasing distance), the exposure should be well below accepted values.

The section has been altered to read as follows:

- Background (typically 0.02 to 0.04 mR/hr) to 0.5 mR/hr = Continue work
- 0.5 mR/hr to 1 mR/hr = Continue work, monitor levels closely
- >1 mR/hr = Leave work area and consult PHSO

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