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State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor
William W. Cobey, Jr., Secretary

William L. Meyer
Director

May 6, 1992

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1822
Attention: MCB Camp Lejeune, RPM
Mr. Bryon Brant
Norfolk, Virginia 23511-6287

Commanding General
Attention: AC/S, Environmental Management
Building 1, Marine Corps Base
Camp Lejeune, North Carolina 28542-5001

Subject: Draft Final Health and Safety Plan - Sites 6,9,48, and 69
USMC Camp Lejeune Military Reservation
NC6 170 022 580
Jacksonville, Onslow County, North Carolina

Dear Sir and Madam:

The North Carolina Superfund Section has received and reviewed the Draft Final Health and Safety Plan for Sites 6, 9, 48, and 69. The following comments are offered on this document:

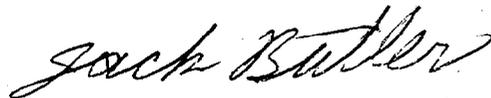
1. Page 1, Section 1.3: It is recommended the phrase "medically certified" be changed to something like: "determined medically fit by a qualified physician to do the tasks required".
2. Page 3, last line: Training in level D protection should be included in the 40 hour safety training.
3. Page 34, under HNU/OVA: How will respirator cartridges be selected? In order to properly select respirator cartridges, all airborne contaminants must be identified, selection cannot be based on selecting a few indicator chemicals.

May 6, 1992
Page 2

4. Page 34 under Drager Tubes and page 39: For what do the polytest tubes test? See comment #3.
5. Page 34, Combustible Gas Meter: It is recommended continuous monitoring with the Combustible Gas Meter take place when CGM readings fall in the range of 10% to 20% of the LEL.
6. Page 39, "Drum Sampling": It is recommended the HNU or OVA be used to continuously sample breathing zone air.
7. Page 39: It is unclear to the reader why a Combustible Gas Meter will be used on a "reaction" basis while conducting surface soil sampling but not groundwater sampling. What if pure product is encountered?
8. Page 41: It is unclear to the reader why a mercury vapor badge will be used for continuously monitoring workers while performing surface soil sampling, an aquatic survey, groundwater sampling, and non-intrusive geophysics, but not during the only 2 forms of intrusive work to be done; monitoring well installation and subsurface (boring) soil sampling.
9. Page 42, footnote 2: The last sentence reads: "The meter must be placed at the survey location and held there until the instrument responds". How long do you wait? Some types of time limit is recommended.
10. Page 43, Radiation Survey Meter: How will level B offer more protection against radiation than level C? A distinction needs to be made here between the different types of radiation and the proper response to each.

If you have any questions please contact me at (919) 733-2801.

Sincerely,



Jack Butler, Environmental Engineer
Superfund Section

cc: Michelle M. Glenn, EPA Region IV