



DEPARTMENT OF THE NAVY
NAVAL HOSPITAL
CAMP LEJEUNE, NORTH CAROLINA 28542-5008

IN REPLY REFER TO

6260.32f
371/89-300-32f
22 Feb 89

From: Commanding Officer
To: Commanding General, Marine Corps Base, Camp Lejeune, NC
28542 (Attn: Chief, DRMO)

Subj: REVIEW OF DEFENSE REUTILIZATION AND MARKETING OFFICE WORK
AT LOT 203

Ref: (a) Chief, DRMO ltr DRMO - ZWM (N. Hensley /5652/srs)
(b) CG, MCB, CL, NC ltr 6280/9 FAC dtd Feb 7, 1989
(c) 29 CFR 1910.120
(d) MCO 6200.1D
(e) NIOSH/OSHA/USCG/EPA "Occupational Safety and Health
Guidance Manual for Hazardous Waste Site Activities,"
DHHS (NIOSH) Pub No. 85-115

1. Introduction. Reference (a) requested that the Industrial Hygiene Branch, Occupational Health & Preventive Medicine Department review and evaluate the potential health hazards to Defense Reutilization and Marketing Office (DRMO) personnel at Lot 203 from the unearthing of drums containing various toxic substances. The following Industrial Hygiene Branch personnel visited Lot 203 on 3 February 1989: LCDR Ron Ellis (Head, Industrial Hygiene Branch), Ms. Jo Stegall (Supervisory Industrial Hygienist), Ms. Glenee Smith (Industrial Hygienist), and Mr. Robert Bastob (Industrial Hygienist).

2. Findings.

a. During the site visit, the Base Environmental Engineer and Base Safety personnel were performing soil gas analyses using an Organic Vapor Analyzer (Foxboro OVA, Model 128). Results of this testing were reported in reference (b). The Environmental Engineer and Base Safety were, also, planning to collect soil samples from the lot and forward them to a reference laboratory for analysis.

b. Reference (b) identified one area (identified as "test 4") with soil gas readings in excess of 1000 ppm. The OVA could not identify the chemical compound, nor could it determine how much in excess of 1000 ppm organic vapors was present. A value of 1000 ppm organic vapors can be insignificant or could be life threatening depending on the identity of the compound. It is, however, unlikely that the compound is immediately dangerous to life and health, as personnel have been working in the area without any apparent significant effects. Again, a prudent approach to interpreting the data is encouraged. There are many toxic compounds which could be present in the soil or soil gas which require more sophisticated/specialized equipment for detection. The information gathered from reference (b) should be considered preliminary data and a final decision on the degree of

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potential hazards associated with Lot 203, should be held in abeyance until all information has been received and evaluated.

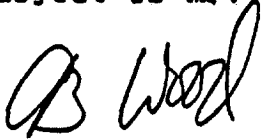
3. Comments/Recommendations.

a. Until a thorough hazard assessment of the area can be completed, it is recommended that the operations on Lot 203 in the areas identified as potential hazardous waste sites be temporarily relocated or significantly curtailed and appropriate personnel protective equipment utilized by workers. The hazard assessment should include in-depth soil analysis and soil gas/ambient air monitoring. However, until results of a comprehensive investigation are completed and all the hazards identified, a conservative approach to worker protection is highly recommended. If work continues at the designated locations on the lot, workers should be instructed not to dig or disturb the soil and to wear appropriate personal protective equipment corresponding to work performed at a hazardous waste site. Refer to references (c) and (e).

b. Depending on the type of personal protective equipment utilized, a Heat Stress Program per reference (d) may need to be implemented.

c. DRMO personnel who work out at Lot 203 should continue to receive Preplacement/Baseline, Periodic, and Termination Medical Evaluations for performing hazardous waste operations as per reference (c).

4. Point of contact on this subject is Mr. Bastob at extension 2707.


A. B. WOOD
By direction

Copy to:
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