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Baker

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January 6, 1992

Commanding Officer
Atlantic Division
Naval Facilities Engineering Command
Building N-26, Naval Station
Norfolk, Virginia 23511-6287

Attn: Mr. Byron Brant, P.E.
Engineer-in-Charge
Code 1822

Re: Contract N62470-89-D-4814
Navy CLEAN, District III
Contract Task Order (CTO) 0106
RI/FS Project Plans for Operable Unit No. 5
MCB Camp Lejeune, North Carolina

Dear Mr. Brant:

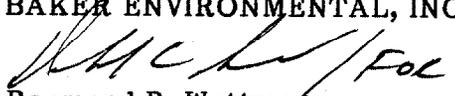
Attached are responses to comments submitted by the U.S. Environmental Protection Agency, Region IV, and the North Carolina Department of the Environment, Health, and Natural Resources. The comments pertain to the Draft RI/FS Project Plans for Site 2 (Operable Unit No. 5) at MCB Camp Lejeune. Also enclosed is a disc which contains the responses (file name: C106RTC5).

Baker is revising the Draft Project Plans in accordance with the attached responses. We anticipate that the Revised Draft Project Plans will be submitted on or before January 13, 1993.

If you have any questions, please do not hesitate to contact me at (412) 269-2016.

Sincerely,

BAKER ENVIRONMENTAL, INC.


Raymond P. Wattras
Project Manager

RPW/nd
Attachment
Enclosure

cc: Ms. Lee Anne Rapp, P.E., Code 183
Mr. Keith Simmons, P.E., Code 0223
Ms. Linda Berry, P.E., Code 1822
Mr. George Radford (CLEJ)

**Response to Comments Submitted by the
US Environmental Protection Agency, Region IV
on the Draft RI/FS Work Plan and Sampling and
Analysis Plan for Operable Unit No. 5
MCB Camp Lejeune, North Carolina
Comment Letter Dated 11/18/92**

Responses to General Comments

1. Various changes to the scope of work have been included in the Draft Final RI/FS Work Plan. These changes were discussed to some extent at the TRC meeting of 12/9/92. These changes will allow the Navy/Marine Corps to meet the project objectives during a single field event to expedite the overall project schedule. These changes are summarized below.

Site 2 (Former Daycare Center)

- The area of concern around Building 712 has been expanded to include the entire lawn area as opposed to the area where pesticide handling was reported (i.e., the children's play area). In addition, subsurface soil samples will be collected at five-foot intervals to the top of the water table.
- Field screening for BTEX will be employed (soil gas survey) to determine both the location, and number, of monitoring wells for purposes of defining the horizontal extent of groundwater contamination previously detected in well 2GW3 at the former storage area.
- Additional deep monitoring wells (only one onsite deep well is proposed at present) will be installed offsite if onsite deep groundwater contamination is detected. Additionally, deep monitoring wells may be installed if offsite shallow groundwater contamination is detected via hydropunching. The location of the deep wells will be based on the field screening results (i.e., soil gas survey) so that deep wells will be placed in the most contaminated areas.
- Additional surface water/sediment samples will be collected along the drainage ditches and in Overs Creek to evaluate ecological impacts and to determine the extent of contamination in both of the ditches. The additional sampling points are between the site and Overs Creek.
- Additional soil borings between the mixing pads will be added to determine the extent of contamination since it is likely that pesticide handling activities occurred in this area of the site.
- Groundwater samples will be analyzed for full TCL organics and TAL inorganics from all five existing wells in addition to any newly-installed monitoring wells.
- A background well will be installed north of well 2GW1 to evaluate background groundwater quality. Two background soil samples will be collected from an area at Camp Lejeune similar to Site 2 (i.e., another office location).

2. Groundwater flow and depth are discussed in Section 2.2.4. In addition, existing groundwater information was considered in scoping the RI/FS (this information is presented in Section 2.2.5). Pesticide contamination in groundwater was detected at very low levels (less than 1 ppb) in only two wells. BTEX, however, has been consistently detected in well 2GW3. Lead and arsenic were detected in well 2GW2 (dissolved lead and arsenic were not detected). The revised scope of work should be adequate to verify the presence of these constituents and determine the extent of contamination in both shallow and deep portions of the aquifer.
3. See Response No. 1 above. In addition, the Work Plan discusses drainage patterns in more detail in Section 2.2.2.
4. This statement (and portion of Section 2.1.5, Regional Hydrogeology) was taken from the USGS report (Harned et al., 1989). We believe that the authors were referring to the area around the Hadnot Point Industrial Area, which is approximately 3 miles from the site, and/or the area near Site 6, which is approximately 1.5 to 2 miles from Sites 2 and 74. Groundwater contamination at the HPIA or Site 6 would not influence either shallow or deep groundwater at Sites 2 and 74 because both of these sites are located upgradient with respect to shallow and deep groundwater flow direction, which is generally toward creeks (shallow aquifer) or the New River (deep groundwater flow). For this reason, the proposed analytical programs for Sites 2 and 74 were not based on the areas identified by Harned et al. since they are not in close proximity to the sites.
5. Site 74 will be investigated at a later date since chemical surety compounds are suspected. Site 74 will be combined with Site 69 to form Operable Unit No. 4.

With respect to all samples being analyzed for full TCL organics and TAL inorganics, there is sufficient background information to focus on contaminants that are expected to be present at the site. Groundwater, surface water, and sediments are being analyzed for full TCL organics and TAL inorganics (Level IV, CLP protocols) since volatiles, semi-volatiles, pesticides, and inorganics were previously detected in one or more medium.

Soil samples collected at the Building 712 area (including the mixing pads) are primarily being analyzed for TCL pesticides since pesticide handling activities have been the only waste-related practices documented at this area. Therefore, only a limited number of samples collected from the Building 712 area are being analyzed for full TCL organics and TAL inorganics. The soil sampling program at the former storage area is focusing on TPH and BTEX since groundwater is contaminated with BTEX. A limited number of samples will be analyzed for full TCL organics/TAL inorganics in order to fully characterize the area and assess human health and ecological risks.

6. Monitoring well logs have not been incorporated into the Work Plan because they are not available. Well construction specifications (i.e., depth of well, depth to groundwater, etc.) have been summarized in Section 2.2. Existing groundwater, soil, surface water, and sediment data have been summarized in Section 2.2.5. Actual Form Is (laboratory data sheets) are not available, with the exception of samples collected by Baker in July 1992. In order to reduce the bulk of the Work Plan, laboratory sheets were not appended. This information is available upon request.

7. Chemical-specific cleanup goals for water will be determined based on risk-based calculations that set concentration limits using carcinogenic and/or noncarcinogenic toxicity values under specific exposure scenarios.

Calculating exposure levels and deriving cleanup goals requires information on many parameters. Various standard values, which are needed as input parameters, will be used. Acceptable intake levels, which are used to estimate permissible contaminant cleanup levels, will be derived from the exposure estimates. These levels will be based on 10^{-4} for carcinogenic contaminants or a Hazard Index (HI) of 1.0. The chronic daily intake (CDI) to these levels (i.e., 10^{-4} or 1.0), the cleanup goal will be obtained by back calculating the corresponding contaminant level in the environment.

The methods and sources used to determine cleanup goals with respect to groundwater includes:

- Environmental Protection Agency (EPA). 1991. Risk Assessment Guidance for Superfund: Volume I Human Health Evaluation Manual (Part B, Development of Risk Based Preliminary Remediation Goals). Office of Emergency and Remedial Response. Publication 9285.7-01B.
- Lyman, W.J., Reehl, W.F., and Rosenblat, D.H., 1982. Handbook of Chemical Property Estimation Methods. New York.

The second reference provides the calculation for the soil-water partition coefficient K_d , which is the equilibrium ratio between the concentration of a contaminant in soil and its corresponding concentration in water.

8. Samples will be collected from Overs Creek and the marsh area of the headwaters.
9. Very little information is available to comprehensively assess the shallow portion of the aquifer at Sites 2 and 74 since a limited amount of information is available (a few boring logs and one round of water level measurements). However, a significant amount of information is available on the deep portion of the aquifer (from the USGS report: Harned et al. 1989) since this report contains a summary of hydrogeologic information obtained during the construction of the many potable water supply wells at MCB Camp Lejeune. Section 2.1.5 has been expanded to include the information in Comment No. 9, when available.

With respect to the comment requesting the backup information to determine the gradient, this information was not presented in the report in which this value was obtained. Groundwater gradients will be calculated based on more than one round of static water level measurements obtained during the RI.

Response to Specific Comments

1. The references to groundwater flow direction, depth to groundwater, etc. is from the Site Summary Report (ESE, 1990). Boring logs, along with water level measurements were only described in the report and were not available for Baker's evaluation. However, a geologic cross section from the USGS report has been added to the Work Plan. Groundwater contour maps were not include since only one round of water level measurements were obtained, and the elevations of the wells are not available to accurately ensure that flow directions are correctly

reported (in previous reports). Groundwater contour maps will be generated in the RI report.

2. Summary tables of all known analytical data have been provided in Section 2 of the Work Plan. Laboratory data sheets (Form I sheets) from previous investigations are not available. For purposes of scoping this RI/FS, the summary tables provide the necessary information.
3. We agree; however, the background document (i.e., Site Summary Report) does not provide the results of the potable water supply wells. Therefore, we can not evaluate or present the results. The locations of the potable water supply wells have been included on a new figure in the Work Plan.
4. This correction has been made for lead.
5. It is not unusual for some dissolved metals analyses to be higher than total metals analyses (e.g., salts such as sodium or calcium that readily dissolve in water). Of the 48 pairs of total/dissolved data, only 7 dissolved analyses exceed the total metals. The 7 instances involve mainly salts. In addition, the dissolved values only exceed the total values by about 10 percent (its possible that the constituents are in a dissolved state). We feel that the data are useful to scope the RI/FS.

With respect to unusually high levels of total sodium (25,300 ug/l), we reviewed analytical data from other sites at MCB Camp Lejeune (the HPIA) and found that total sodium values often exceeded 25,000 ug/l. It is possible that sodium in groundwater at MCB Camp Lejeune is elevated.

The MCLs for arsenic and lead have been changed in accordance with the comment.

6. The MCLs for methylene chloride and barium have been revised.
7. The NCWQS for iron has been revised.
8. The MCLs on the table have been revised.
9. The sentence referring to the shallow aquifer has been deleted. A section has been added (Section 2.1.10) to discuss the supply wells and source of potable water.
10. This pathway has been added.
11. Background information, including the usage of the site and contaminants detected in wells near Building 712, do not indicate that other contaminants such as PCBs, semi-volatiles, or volatile organics would be present in this area. To analyze all samples for full analysis would be costly. Only ten percent of samples collected around Building 712 will be analyzed for full TCL organics/TAL inorganics. If contaminants other than pesticides are detected in these samples, then full TCL organics and TAL inorganics may be required via additional soil investigations. Based on existing information, pesticides are the only contaminants expected to be present at the site.
12. All groundwater samples will be analyzed for full TCL organics and TAL inorganics.

13. An additional surface water/sediment sample west of Holcomb Blvd. has been added. However, the drainage ditch on the western side of Holcomb Blvd. receives runoff from the roadway and other offsite sources.

Groundwater flow is believed to be southeast, based on limited information. The exact location of wells to assess the extent of BTEX contamination, will be based on field screening (soil gas survey). With the exception of one background well, located north of Building 712 and well 2GW2, no new wells will be required to assess the extent of arsenic in shallow groundwater (the configuration of the existing wells should be adequate to determine the extent of arsenic and lead detected in well 2GW2).

14. Two soil, sediment, and surface water samples will be collected to represent background conditions. One background well will be installed. All background samples will be analyzed for full TCL organics and TAL inorganics.
15. The status of the RI/FS for Site 74 is on hold. This site will be investigated along with Site 69 since both sites potentially contain chemical agents. With respect to the comment, it is likely that all samples will be analyzed for full TCL organics and TAL inorganics.
16. More than one background sample is required. The proposed location was chosen near the roadway to determine if pesticides are present as a result of historical pesticide spraying practices. The location will be further away from the pest control area than shown on the figure (at least one-half mile from the site).
17. All wells will be analyzed for full TCL organics and TAL inorganics during the first round.
18. Recently acquired historical photographs will most likely change the proposed configuration of monitoring wells shown on Figure 5-5. Other areas of concern have been identified. These photographs are being evaluated at present.
19. The methods for purgeable organic compounds (EPA 624), base/neutral and acid extractables (EPA 625), and pesticides/PCBs (EPA 608) are cited from the USEPA Contract Laboratory Program Statement of Work for Organic Analysis. The appropriate methods of extraction for water and soil matrices are described in these methodologies. However, the methods of extraction are based upon SW-846 Methods 8240 (for volatile organics) and 3510/3550 (water/soil semivolatile organics, pesticides, and PCBs). Extraction procedures for herbicides and BTEX compounds are provided in SW-846 methods 8150 and 8020, respectively. The metals arsenic, selenium, thallium and lead will be extracted according to SW-846 method 3020. All other metals will be extracted according to SW-846 method 3010.

The table has been revised to indicate the extraction procedure when appropriate.

20. The references have been updated per the comment.

**Responses to the Draft Sampling and Analysis Plan for
Sites 2 and 74**

1. This comment was addressed previously. Please see response No. 11 (under Work Plan).
2. This comment was addressed previously. Please see response No. 19 (under Work Plan).
3. The soil sampling program has been expanded to cover the area surrounding Building 712.
4. A change was made in the investigative approach. Soil samples will be collected at five-foot intervals to the top of the water table. For borings converted into monitoring wells, one soil sample will be collected just below the water table.
5. Groundwater samples will be analyzed for full TCL organics and TAL inorganics. Not all soil, sediment, or surface water samples will be analyzed for full TCL organics/TAL inorganics since the background information as well as what has been detected during previous investigations focuses the investigations on pesticides (Building 712 area) and BTEX (storage area). At least 10 percent of soil, sediment, and surface water samples collected will be analyzed for full TCL organics and TAL inorganics.
6. The text has been revised to match the figure.
7. This comment has been addressed previously. See response No. 12 under Work Plan comments/responses.
8. All existing wells will be sampled.
9. Downgradient well locations will be determined following field screening (soil gas survey).
10. This comment has been addressed. See response No. 15 and 18 under Work Plan comments/responses.
11. Additional surface water/sediment sampling locations have been added between the site and Overs Creek, and near the mixing pad area.
12. Additional surface water/sediment sampling locations have been added between the site and Overs Creek.
13. Additional geophysical investigations may be necessary based on recently acquired historical photographs showing other land disturbances. The investigation at Site 74 is on hold; it will be re-scoped along with Site 69.
14. Please refer to response No. 18 under Work Plan comments/responses. The comment will be taken into consideration when the groundwater investigation is re-scoped and new information (i.e., aerial photographs) are evaluated.
15. This comment has been addressed. Please refer to response No. 15 under Work Plan comments/responses.

16. This comment has been addressed. Please refer to comment No. 18 under Work Plan comments/responses.
17. The references to the various areas of concern will be changed to avoid confusion. However, after reviewing the EPIC photographs, it is difficult to determine which disposal area may have been associated with the grease disposal (the photos indicate several other areas of concern). It is possible that no reference to a particular area will be identified as "grease disposal area" when the new Project Plans for this site are developed.
18. Organic-free deionized water will be used for decontamination.
19. The soil will be stockpiled and dealt with when the site is remediated if the soil results indicate that the soil is hazardous, or contains CSM agents. This is consistent with EPA guidance for the handling of IDW. If the soil is not hazardous and not contaminated above land-disposal levels, the soil will be placed back onsite or within a landfill.
20. Wells at Site 74 have been sampled on more than one occasion; little to no contamination has been detected in these wells (Baker recently sampled these wells in July 1992; the samples were analyzed for full TCL organics/TAL inorganics via CLP protocols, Level IV). The use of PVC is justifiable as noted in the SAP, Attachment A of Section 5.
21. A ten-foot screen will be constructed in each well.
22. The well construction procedure has been revised to reflect EPA Region IV guidance.
23. The well construction procedure has been revised to reflect EPA Region IV guidance.
24. All existing wells will also be surveyed.
25. The handling of IDW has been revised. Soil will be stockpiled onsite, sampled and analyzed for full TCLP and RCRA hazardous waste characteristics, and properly handled following receipt of the analysis (see Section 5.10.3).
26. All groundwater will be containerized pending analytical results.
27. The procedure has been revised to reflect EPA Region IV protocol.
28. Wells will be developed until the pH, specific conductivity, and temperature has stabilized (three consecutive readings that are within 10 percent of each other), and the water is free of sediment. This has been clarified in the SAP.
29. The figure has been replaced to show a Chain-of-custody that Baker has been using at other investigations at MCB Camp Lejeune.
30. This comment has been addressed. Please refer to response No. 19 under Work Plan responses/comments.

**Response to Comments Submitted by the
North Carolina DEHNR
on the Draft RI/FS Work Plan and Sampling and
Analysis Plan for Operable Unit No. 5
MCB Camp Lejeune, North Carolina
Comment Letter Dated 12/01/92**

General Comments, Site 2

The list of parameters covered by TCL organics and TAL inorganics is provided in the Quality Assurance Project Plan.

The sequence of RI/FS tasks will be defined when the Plans are finalized since additional changes in scope may be made.

Specific Comments, Site 2

Figure 2-4: The scale on drawing 2-4 has been corrected (160 feet).

Section 2.2.5.1: Chemical abbreviations are often used for pesticides/herbicides due to the complex names of these compounds. These abbreviations are also used by the laboratories when reporting the information on Form ID.

Table 2-1: Soil action levels that are protective of human health and the environment will be considered as part of the FS.

Baker will provide the DEHNR with one unbound report as part of upcoming submittals.

Table 2-4: The corrections to Table 2-4 that were noted in the comment have been made.

Section 2.3.6: The NCWQS for iron has been changed to 300 ug/l.

Section 3.2.2: The area surrounding Building 712 has now been included as part of the overall study.

Section 3.1.2: The first bullet has been revised to reference the building 712 area.

Table 2-4: It is not unusual for dissolved metals analyses to be higher than total metals analyses (e.g., salts such as sodium or calcium that readily dissolve in water). Of the 48 pairs of total/dissolved data, only 7 dissolved analyses exceed the total metals. The 7 instances involve mainly salts. In addition, the dissolved values only exceed the total values by about 10 percent (its possible that the constituents are in a dissolved state). We feel that the data are useful to scope the RI/FS.

Section 2.2.4: As mentioned in the Work Plan, there is only a limited amount of information to discuss and present. Only five wells were installed, one round of water level measurements were taken, and no aquifer testing was performed. The site-specific geologic and hydrogeologic characteristics will be expanded in the RI report following Baker's field investigation.

Section 3.1.4.1: Soil action levels that are protective of human health (e.g., risk-based) and the environment will be considered as part of the FS. At present, there are no soil

standards; therefore, no ARARs have been identified in this section that specifically address risk-based action levels.

3.1.4.2: Title 15 regulations pertaining to wetlands and coastal areas have been included. Both RCRA (40 CFR 268) and the State of North Carolina (Rule 0.0012 Part 268) Regulations for land disposal have been included as ARARs.

Table 3-2: The table is presenting the results of surface water samples collected from the Operable Unit (Sites 2 and 74). Therefore, this footnote was necessary since no surface waters have been collected from Site 74. This note is no longer needed since Site 74 has been combined with Site 69 due to the potential presence of chemical agents at Site 74.

Section 3.1.6.2: This section has been revised to note that both arsenic and lead were detected in well 2GW2 above State and Federal standards.

Section 3.1.6: The lack of site-specific geologic/hydrogeologic information has been referenced in this section. This information will be required to better assess potential contaminant migration pathways as well as engineering alternatives such as groundwater pumping.

Section 4.0: The sentence has been revised: "which than" has been replaced with "that".

Table 4-1: The reference to Building 712 in the title of the table has been deleted.

Table 4-1: The presence of an underground storage tank was mentioned only because of the types of contaminants detected in groundwater at the former storage area (fuel constituents such as ethylbenzene and toluene). There is no documented evidence that an underground storage tank exists. Baker performed a geophysical investigation of this area (it was performed during the geophysical investigations at Site 78 and 24). Based on the findings, no tanks are suspected of being buried in this area of the site. The Work Plan has been revised to include a discussion of the geophysical investigation. In addition, no geophysical investigations will be required as part of the RI.

Section 5.3.1.2: The survey lines were based on assumed data.

Section 5.3.1.2: More than one sample from each area will be analyzed for full TCL organics and TAL inorganics.

Section 5.3.1.3.1: The scope has been changed to collect both surface and subsurface soil samples from around Building 712.

Section 5.3.1.4: All wells will be sampled and analyzed for full TCL organics and TAL inorganics.

Comments to the Sampling and Analysis Plan

Section 3.1.1: No. It was only theorized since fuel-related constituents have been detected in well 2GW3 at the former storage area. Because fuel constituents were detected, the possibility that an UST may exist in this area. This possibility was ruled out based on the recently performed geophysical investigation at this site.

Table 3-1: The pads are very close to one another. We will continue to refer to the pads as only one area. However, we will indicate that two pads are present within this area.

Section 3.1.2.1: Subsurface soil samples will be collected at five-foot intervals to the top of the water table.

Section 3.1.2.2: The text has been revised to indicate nine borings.

Section 3.1.4.1: Groundwater samples will be collected from all wells and analyzed for TCL organics and TAL inorganics.

Figure 3-2(sic): The scale on Figure 5-2 has been corrected.

Section 5.2: National Sanitary Foundation (NSF)-approved PVC will be used. NSF approved PVC takes into account the leachability of compounds. However, no manufacturer's specification will assure that a compound will not absorb to, or leach from PVC since the phenomenon is dependent on site-specific applications. The use of stainless steel is not full-proof with respect to well integrity since even stainless steel will corrode under certain conditions. The use of PVC or any other material must be evaluated on a case by case basis. The use of PVC at site 2 is justifiable as presented in section 5 of the SAP.

Section 5.10.3.1: Drill cuttings will be containerized pending appropriate analytical analysis (TCLP, RCRA Hazardous Waste Characteristics, TCL organics, and TAL inorganics).

Section 5.10.6: The intent of the NC regulations regarding storage is for active TSD facilities and is not directly applicable to storage of purge water and other IDW wastes generated as part of environmental investigations. When applicable to the situation, the NC regulations will be considered. Baker will follow EPA guidance (EPA Publication 9345.3-03FS, Guide to Management of Investigation-Derived Wastes) for managing investigative-derived wastes. Section 5.10.6 has been revised taking into account the EPA guideline mentioned above.

Comments to the Health and Safety Plan

Page 5: The sentence has been rephrased.

Page 27: It has been our experience that background levels average around 2 ppm, therefore, the 5 to 7 ppm range allows for the sum of the background concentration (i.e., 2 ppm) and the 5 ppm allowable level. Typically, a meter reading will peak at a higher level, stabilize to the range stated, then drop. Every situation varies, but we believe this range to be appropriate based on our experience to date.

It is correct that chemicals cannot be specifically identified with the proposed instrumentation, but overall, the HNu/OVA will respond to volatiles in varying degrees. Although non-volatile pesticides will not register on the HNu/OVA, good sampling techniques and appropriate PPE will reduce the chance of worker exposure.

It is understood that a "ppm" relationship with regard to a realtime instrument's response is unsubstantiated; however, the HNu and OVA scales are expressed in ppm. Therefore, the units "ppm" will remain to express concentrations. Note that EPA also uses "ppm" when expressing recommended levels of protection.

We are not comfortable stating that Level D protection is appropriate for background concentrations and that Level C protection is appropriate for levels as high as 5 ppm above background. Background levels may be elevated in some cases, allowing for an unacceptable exposure scenario.

Page 28: The statement in the Health and Safety Plan will be revised since it is misleading. Drager Tubes are not required for either Site 2 or 74. Although Drager Tubes are not highly accurate and are subject to various interferences, they provide an indication of the constituents present in a timely fashion under certain situations.

Page 30: Due to the level of protection designated for monitoring well installations and soil borings (Level C), continuous monitoring is required since levels may change instantaneously.

It has been our experience during drum sampling that airborne concentrations will peak, then drop and stabilize once a drum is opened; therefore, initial and periodic monitoring is considered appropriate in conjunction with Level B protection.

Page 32: A hard hat will be required under Level D+ protection.

Page 34: The 100 ppm concentration allows for any unforeseen circumstance that may place an employee in a condition under Level C protection, where airborne concentrations (peak concentrations) exceed those specified on Page 27 of the Health and Safety Plan. In this case, the remaining absorbency of the cartridge is questionable, and the cartridge replaced.

Page 41: The names of the roads will be placed on Figure 3.

Page 44: Treatment for shock is covered in Standard First Aid. Personnel trained in first aid will be identified in Table 4.

Page 45: The statement requires that injuries beyond standard first aid (i.e., serious injuries resulting in hospitalization) are reported to management within 24 hours so that appropriate actions can be taken, as necessary. Although it is not directly applicable to the section (decontamination), it is relevant to the preceding paragraph.1992