



Incremental Sampling & Best Practices for Lead Investigations

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Superfund Division**

Former Chattanooga Foundries

- ◆ 60+ foundries historically located in Chattanooga
- ◆ Generated spent sand and baghouse dust over many decades



Former Chattanooga Foundries



Foundry-related Waste Material

- ◆ Foundry-related waste material: spent sand, bag house dust, other byproducts
- ◆ Heterogeneous; can contain lead
- ◆ Waste material was used as fill (1890's – 1970's)



Initial EPA Involvement

- 2011: resident presented at ER with Pb poisoning
- 2012: EPA removed Pb contaminated soil at 84 residences
- Limited geographic area
- Extent of contamination undefined
- **Other residential areas may be similarly impacted**
- **Risk undefined**



Potential Large Urban Lead Site: Where to Begin?

Is all of downtown Chattanooga contaminated?

NO



Objectives of the Investigation

- ◆ Collect high quality data to support risk management decisions
- ◆ Produce defensible, actionable data that can be used for multiple purposes:
 - Site characterization
 - Time-critical removal decisions
 - Potential NPL listing or other response
 - Future CERCLA Remedial Investigation & Risk Assessment

Defensible

Actionable

Multiple Uses



Best Practices for Sampling for Lead in Soil

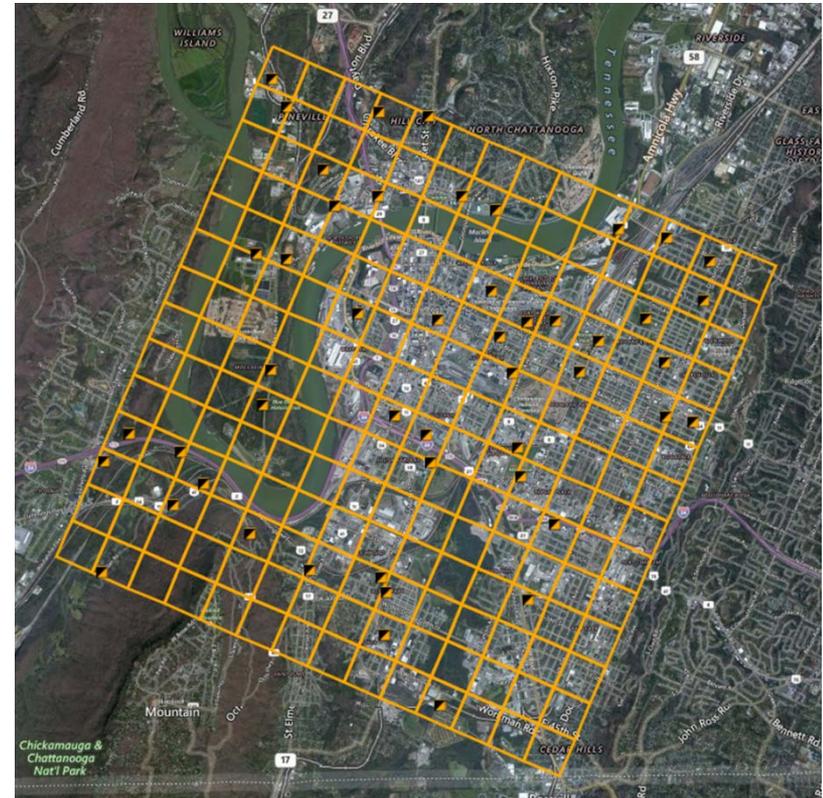
- Establish robust background concentration/range
- Incremental Sampling Method (ISM)
- OLEM Directive for sieving soil at lead sites
- EPA Superfund XRF Field Operating Guide
- OLEM Directive “*Updating Scientific Considerations for Lead in Soil Cleanups,*” Dec. 22, 2016
 - Lead bioavailability testing
 - Develop site-specific cleanup level for lead



Best Practice: Establish Background Level for Lead

Chattanooga Urban Bkg Study

- ◆ 5x5 mile grid; 50 randomly selected cells
- ◆ Used SAP/QAPP template from larger R4 urban background study
- ◆ 7 metals associated with foundries: Pb, As, Cd, Cr, Cu, Ni, Zn; plus PAHs



Urban Background Results

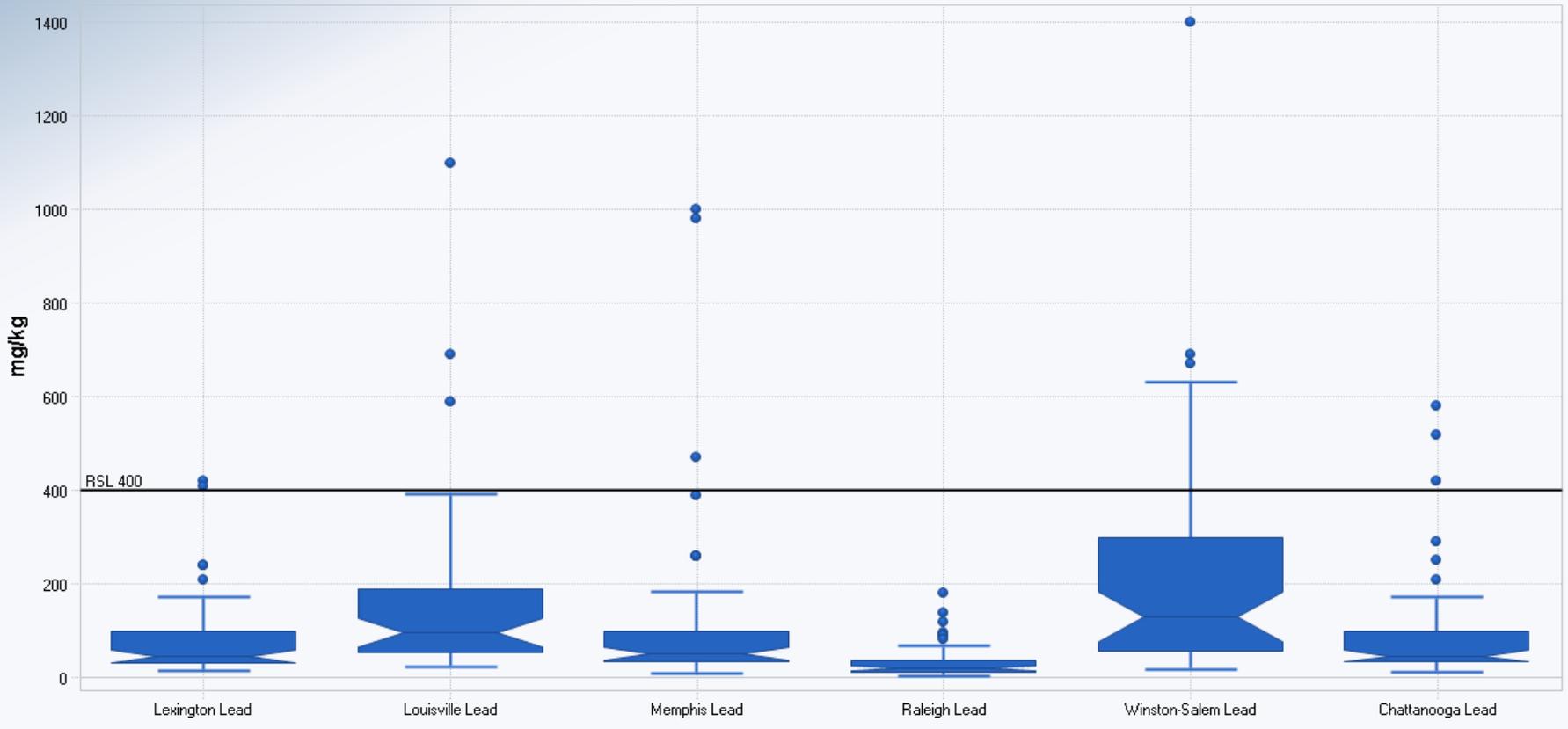
	RSL	Mean Bkg (mg/kg)	Urban background 95% UTL (mg/kg)
Lead	400	60	175
Arsenic	0.68	3.4	7
Chromium		25	33

- Background lead consistent with other cities in SE U.S.
- Robust background dataset ready for RI
- Elevated lead concentration **NOT** “everywhere”



Chattanooga Lead Background vs. 5 Cities

R4 Urban Lead



Lexington

Louisville

Memphis

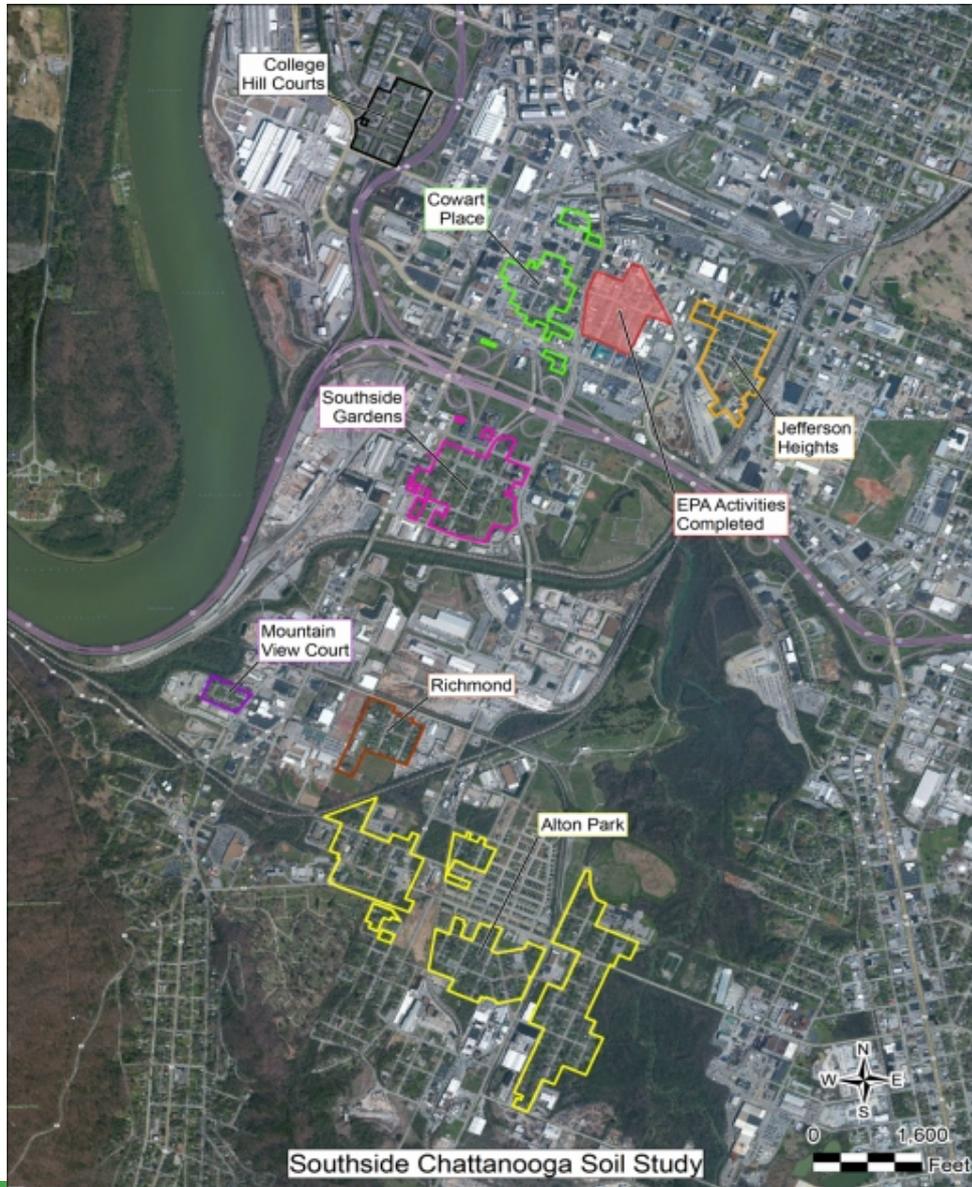
Raleigh

Winston-Salem

↑
Chattanooga



Identify Study Areas



Field Operation



Best Practice: Incremental Sampling Methodology (ISM)

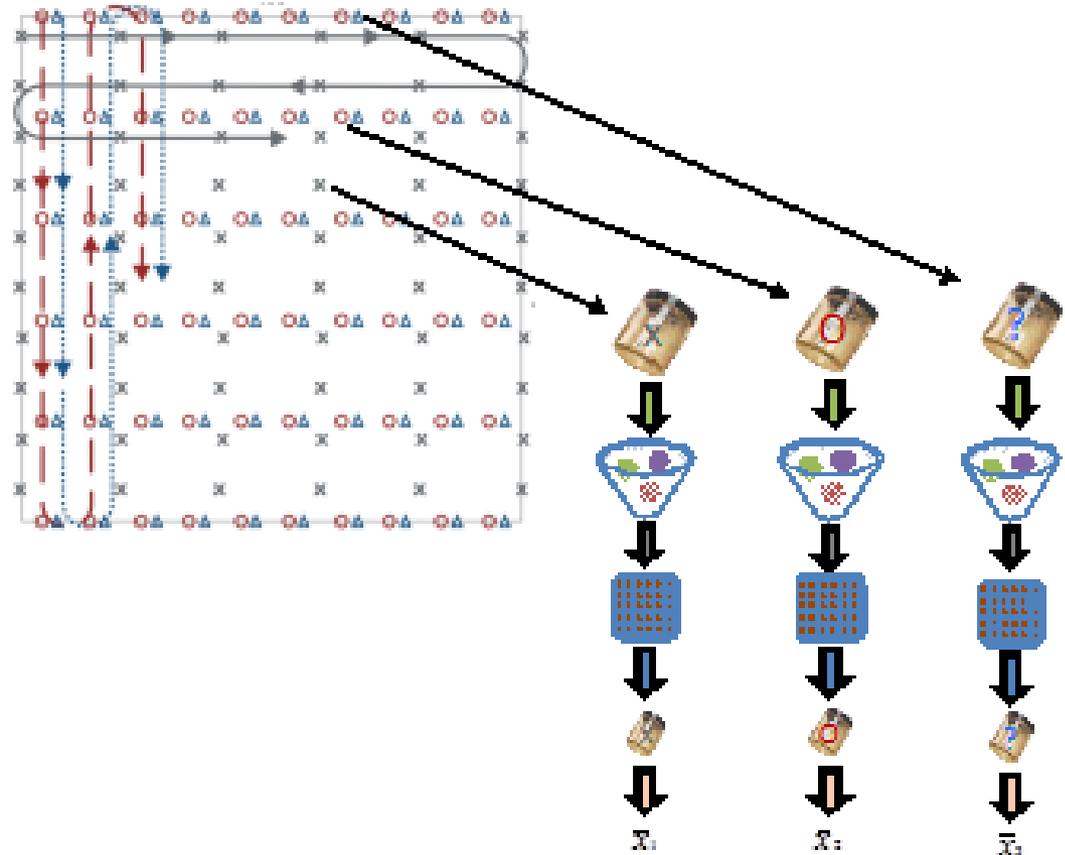
Why ISM?

Superior method to derive an unbiased estimate of the mean concentration of a given area (i.e. decision unit)

One ISM sample is collected for each decision unit

Each sample is comprised of 30 aliquots, and produces one concentration that represents the entire decision unit (yard)

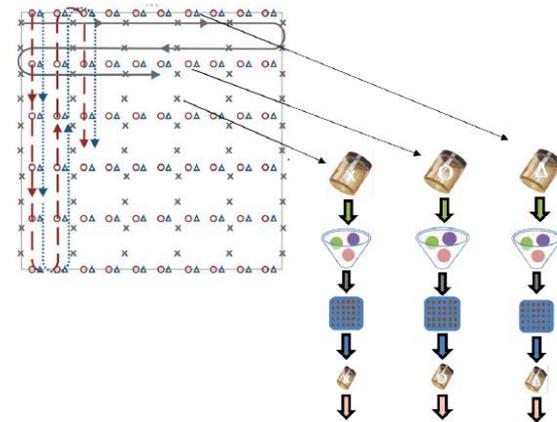
Statistically defensible data on which to base decisions





Technical and Regulatory Guidance

Incremental Sampling Methodology



February 2012

Prepared by
The Interstate Technology & Regulatory Council
Incremental Sampling Methodology Team

https://www.itrcweb.org/ism-1/pdfs/ism-1_021512_final.pdf

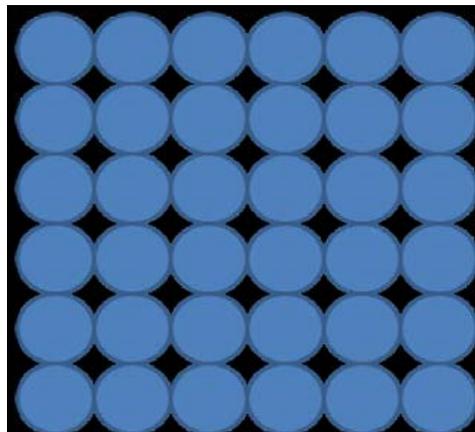
<https://www.itrcweb.org/ism-1/>



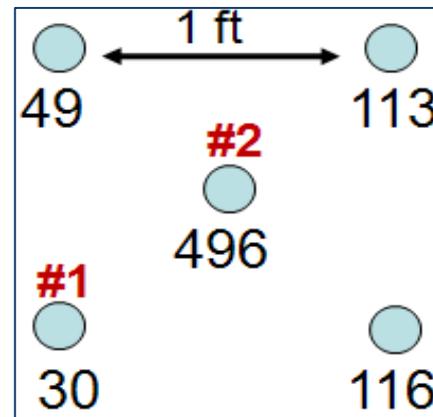
Best Practice: Incremental Sampling Methodology (ISM)

Addresses heterogeneity in soils and variation in contaminant concentrations:

- ◆ “microscale” heterogeneity
- ◆ “Short-scale” and large scale heterogeneity



1 ft² area of surface soil contains 36 possible 2” diameter core sample locations

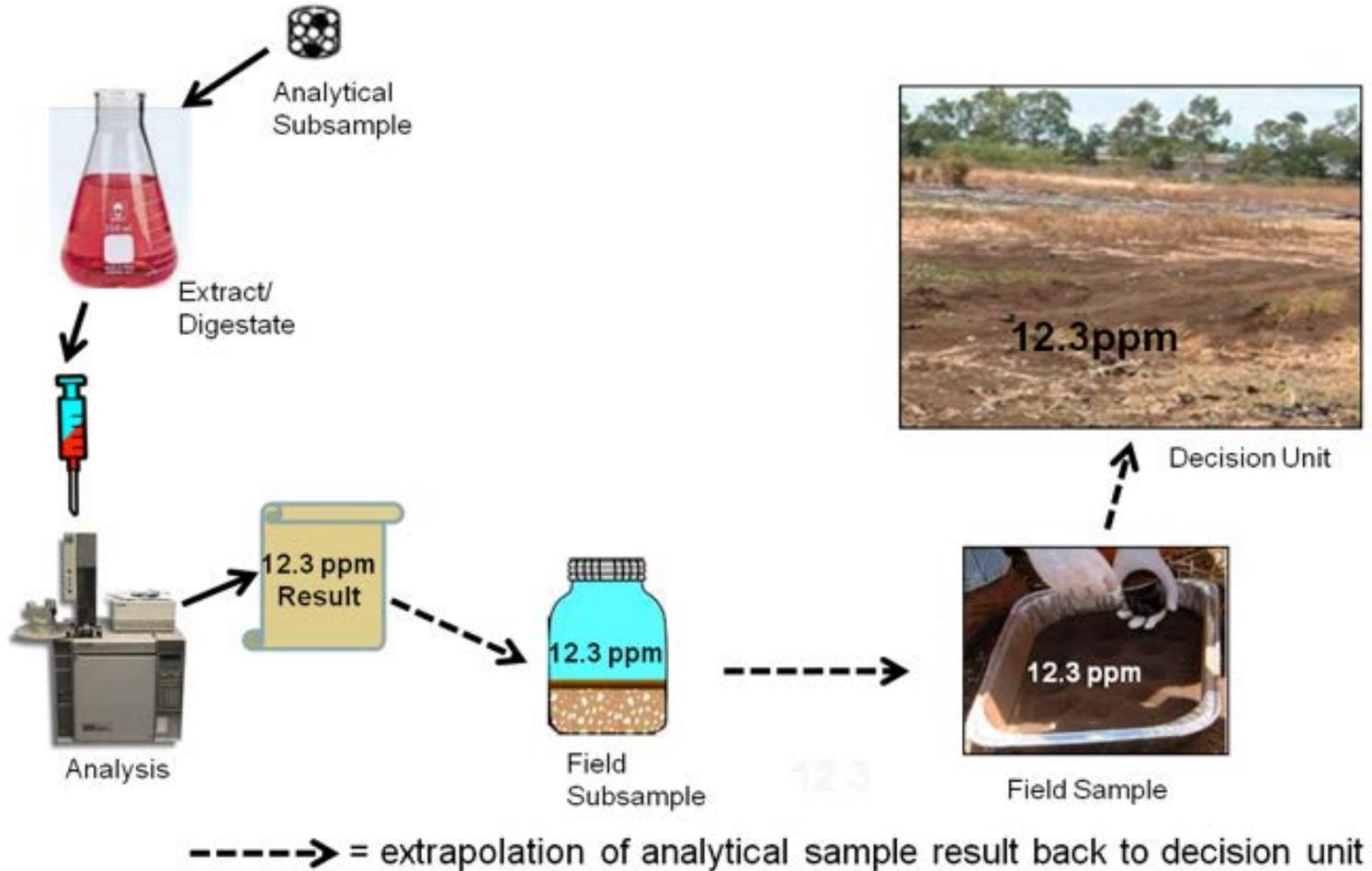


Observed short-scale heterogeneity with uranium sample results

IRTC *Incremental Sampling Methodology*, February 2012, Figures 2-5 & 2-6



Extrapolating Analytical Result to Decision Unit



IRTC *Incremental Sampling Methodology*, February 2012, Figure 2-7



EPA/600/R-03/027
November 2003

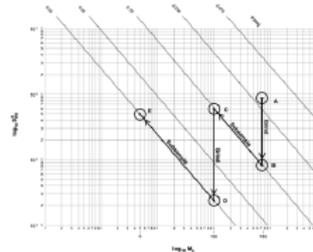
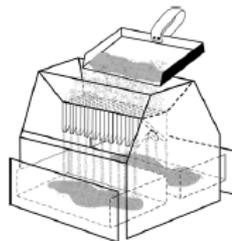
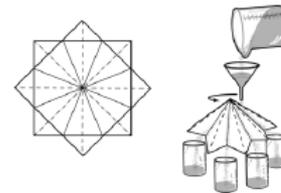
Guidance for Obtaining Representative Laboratory Analytical Subsamples from Particulate Laboratory Samples

by

Robert W. Gerlach
Lockheed Martin Environmental Services

and

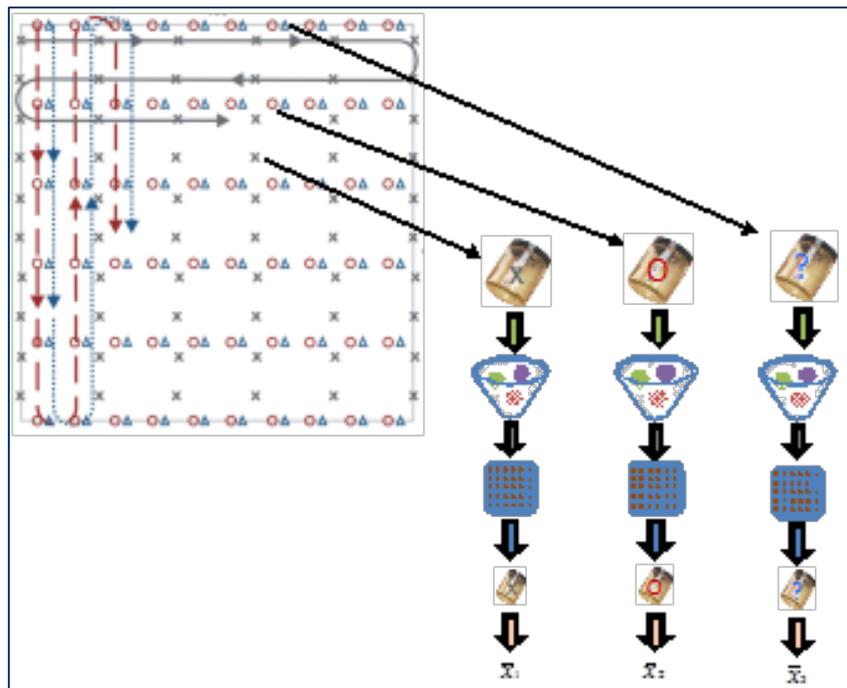
John M. Nocerino
U.S. Environmental Protection Agency



223CMB03.RPT ♦ 10/27/03

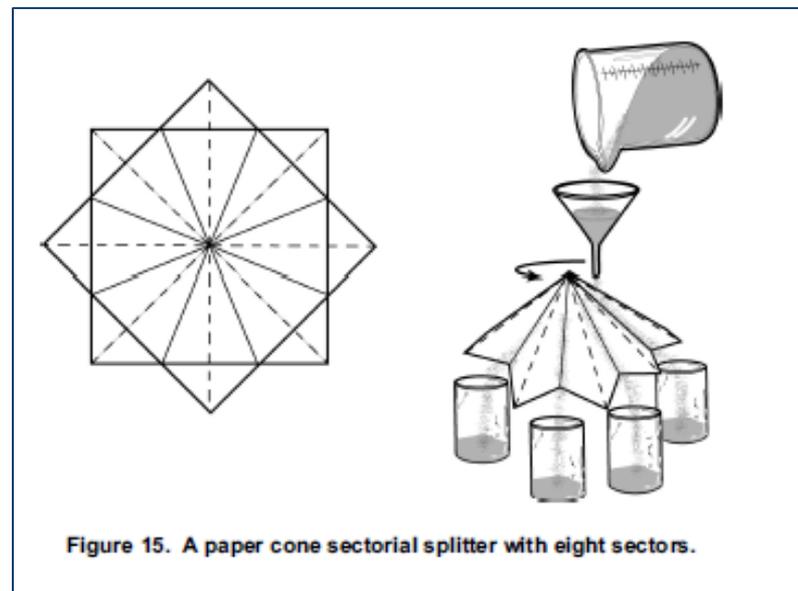
<https://itrcweb.org/ism-1/references/guidancerl.pdf>





30 aliquot field sample

Subsampling for analysis



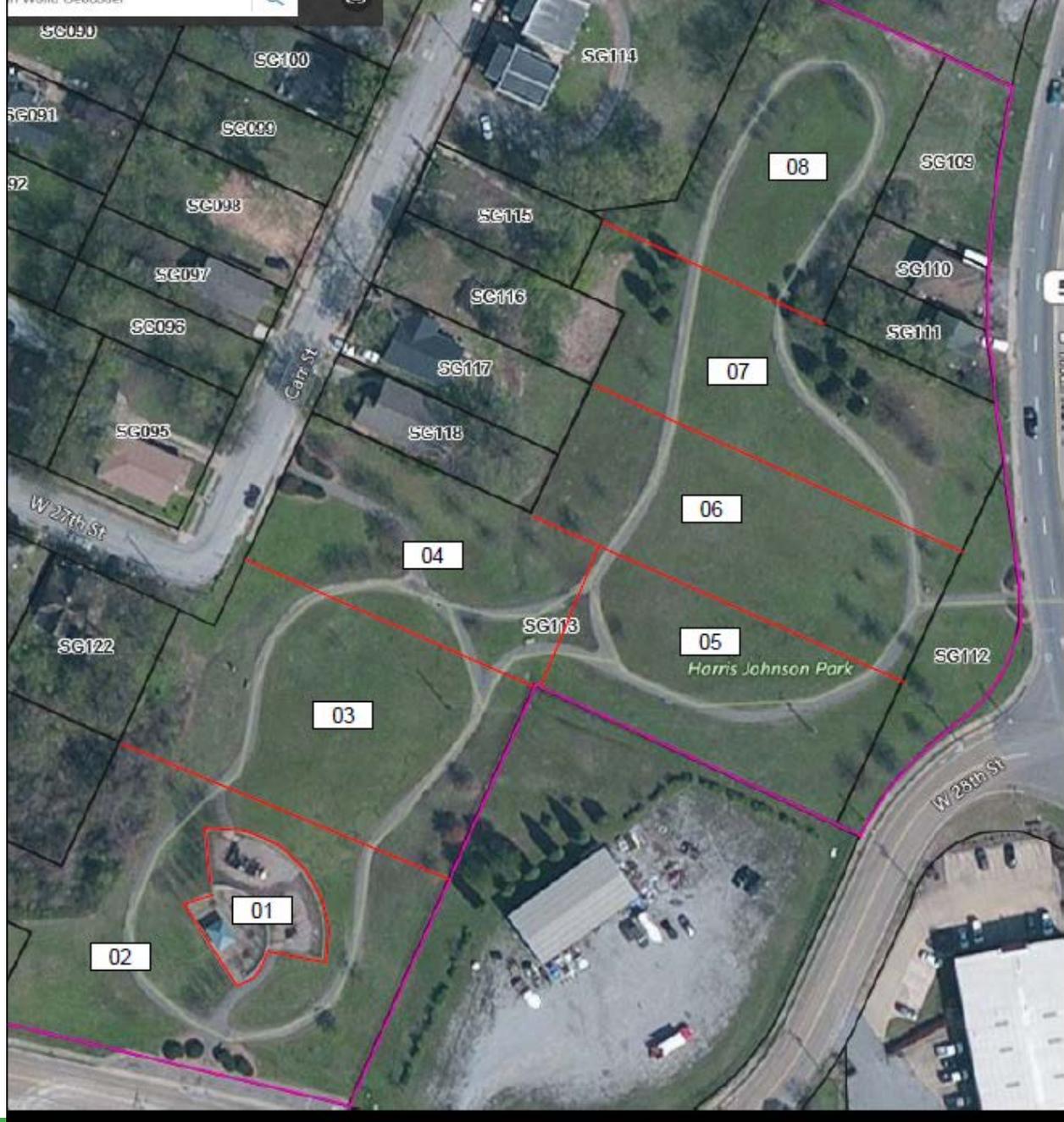
Guidance for Obtaining Representative Subsamples, Nov. 2003



ISM: Decision Units







Incremental Sampling in Chattanooga



Collecting ISM: Time & Effort



One 30-point composite from a residential yard takes 8 minutes to collect



Disaggregation and Drying



OLEM Lead Sieving Directive



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 1 - 2016

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MANAGEMENT

MEMORANDUM

OLEM Directive 9200.1-128

SUBJECT: Recommendations for Sieving Soil and Dust Samples at Lead Sites for
Assessment of Incidental Ingestion

*Recommendations for Sieving Soil and Dust Samples at Lead Sites
for Assessment of Incidental Ingestion, OLEM Directive 9200.1-128*



OLEM Lead Sieving Directive

- Recommends $< 150 \mu\text{m}$ particle size (#100 mesh)
- Incidental ingestion greater for fine particles.
- Dermal adherence greater for fine particles.
- Increased contaminant concentration, mobility, and bioavailability in fine particles.



Dermal Adherence



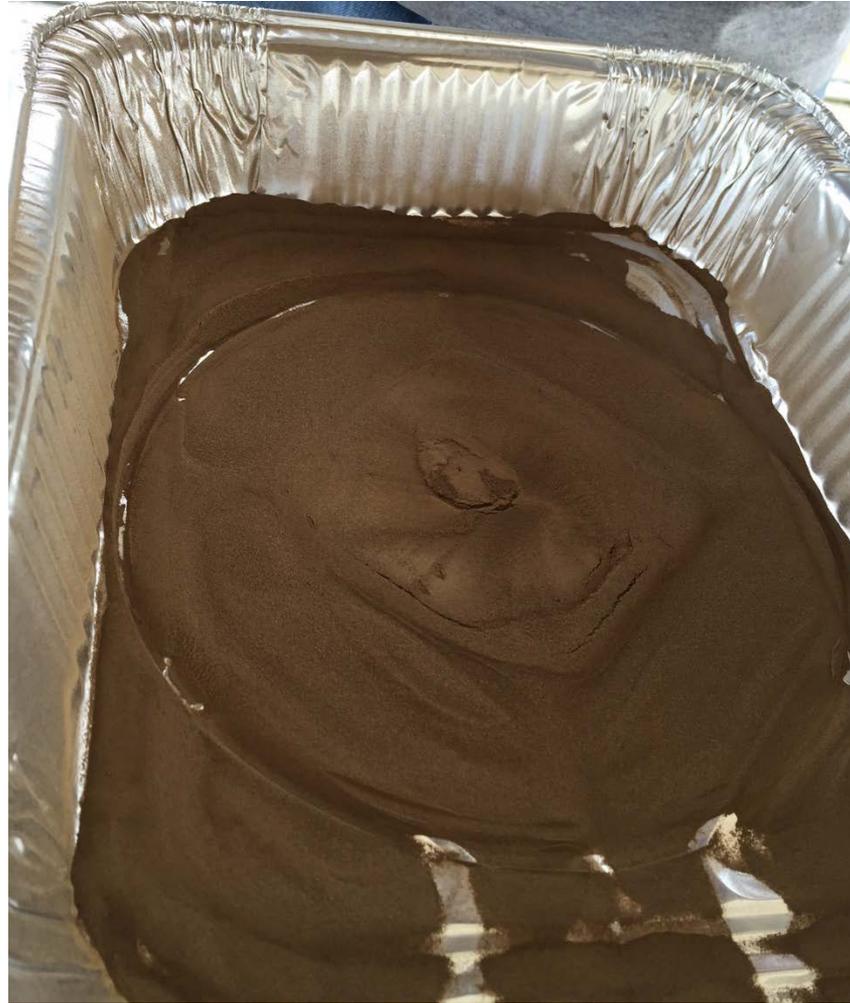


Sieve of Stacked Mesh (#10 and #100)





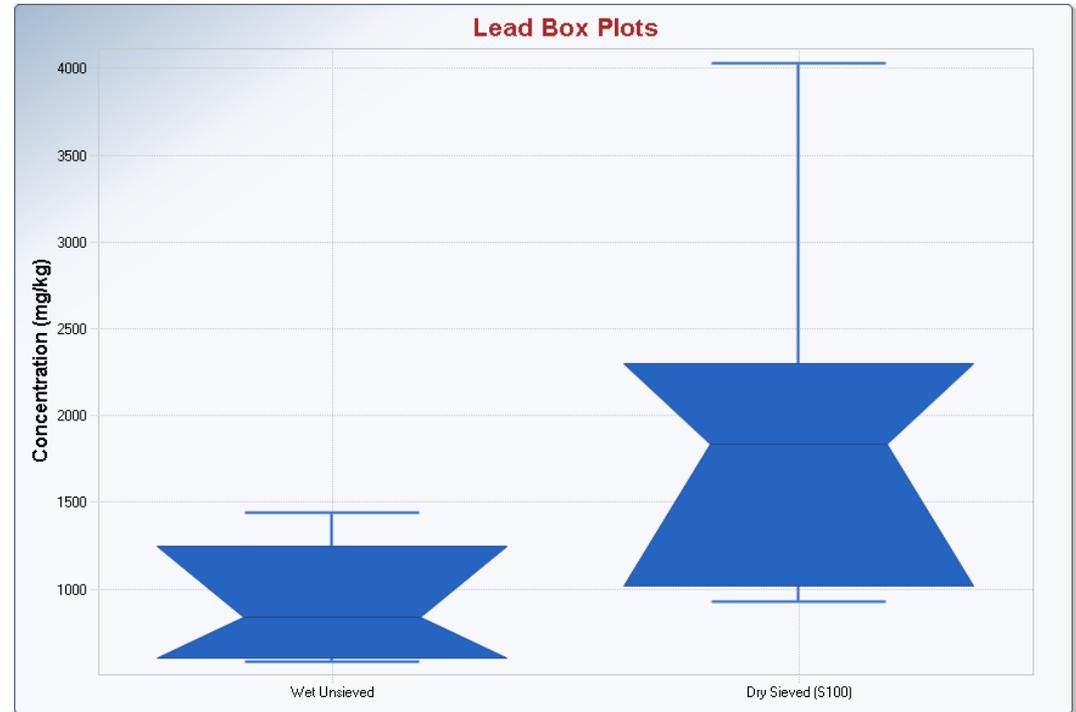
Fine Fraction <150 microns



Lead Concentrates in the Fine Fraction

Pb in mg/kg

Unsieved	Sieved
603	1016
837	1832
1434	4021
1245	2300
591	936



At this site, sieved soil has approximately 100 ppm higher concentration than in unsieved.



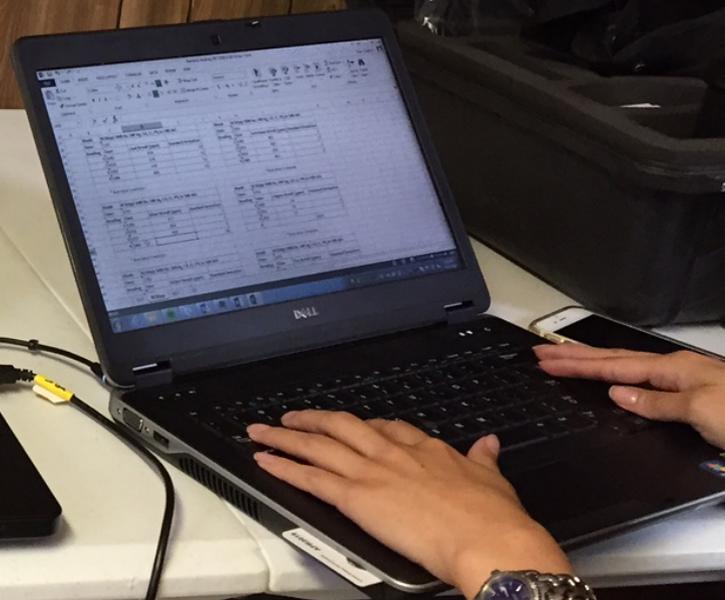
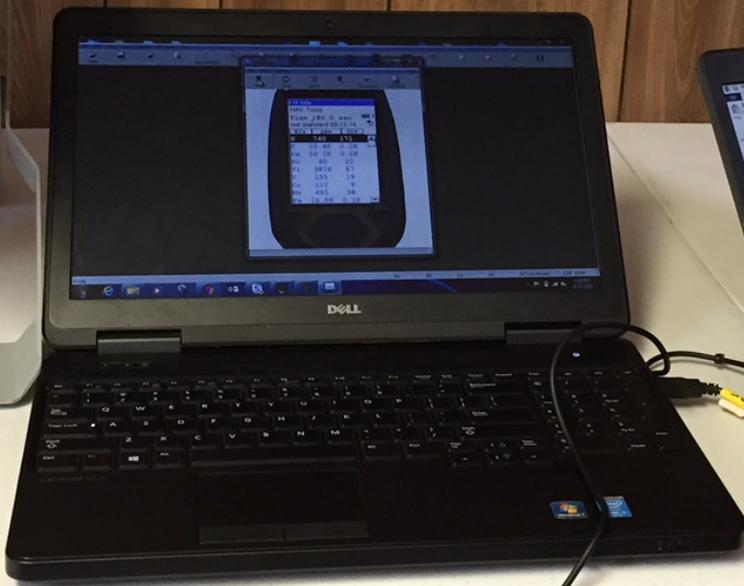
ISM Includes Representative Subsampling

“One-Dimensional Slab Cake” procedure



Representative subsamples for analysis





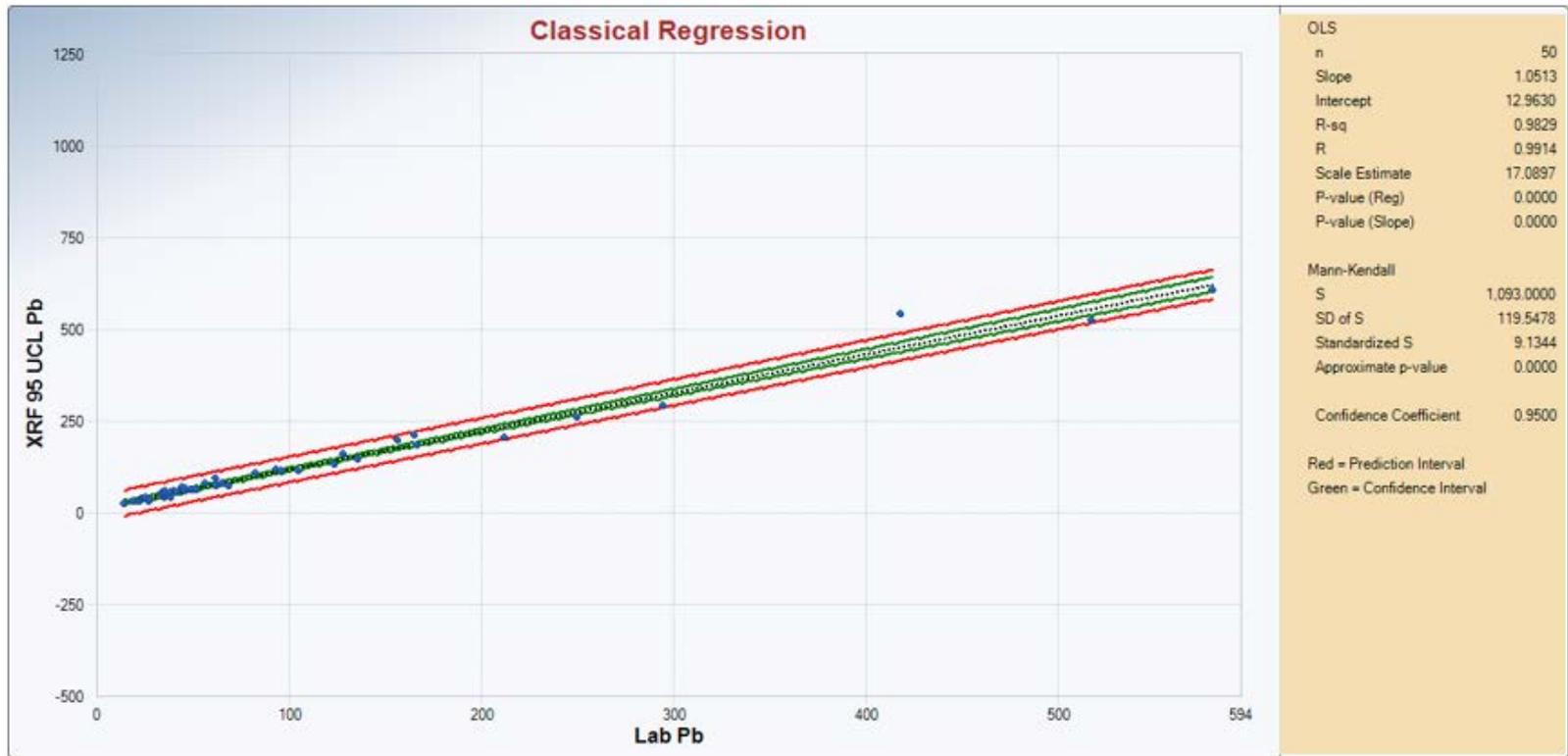
Best Practice: X-Ray Fluorescence Field Operations Guide

Superfund X-Ray Fluorescence Field Operations Guide, EPA Region 4, July 19, 2017 (SFDGUID-001-R0)

- ◆ Tool for OSCs and RPMs
- ◆ Methodology to collect high quality XRF data for lead and arsenic
- ◆ Provides real-time data
- ◆ Multiple readings and QA/QC measures
- ◆ Produces “definitive” data = data of sufficient quality to use in remedial and removal decisions and in the BLRA



XRF vs Lab Data: Lead

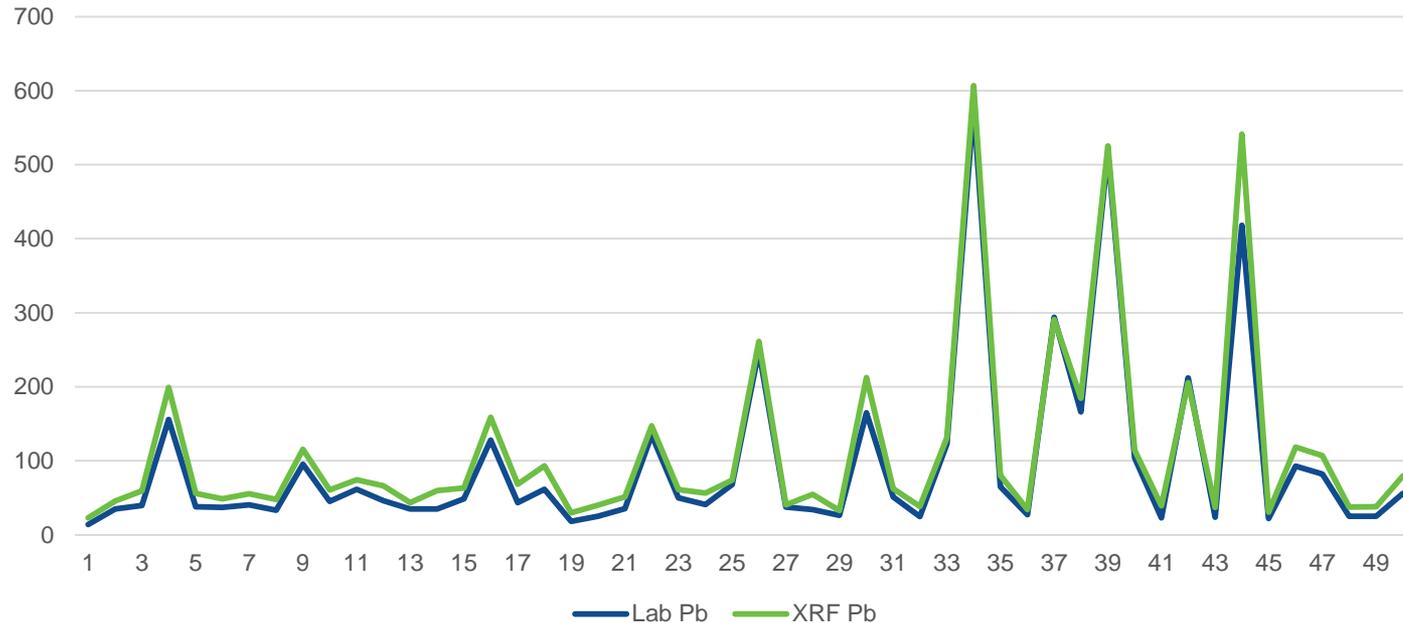


R Squared = 0.98

Excellent agreement between XRF data and lab data.



XRF vs. Lab: Pb



XRF provides reliable, reproducible & defensible data for Pb for this project (n = 300+)



Best Practice: Site-specific Clean-up Levels for Lead



OLEM Directive: *Updated Scientific Considerations for Lead in Soil Cleanups*, Dec. 22, 2016



Best Practice: Lead Bioavailability

UNDERSTANDING BIOAVAILABILITY of ARSENIC and LEAD in Soils at Superfund Sites

Arsenic and lead present in soil must be bioavailable in order to pose a risk to your health.

Contaminated soil often contains different forms of arsenic or lead that have different bioavailability.

Bioavailable forms of arsenic and lead will be **absorbed into the body and processed or stored** following ingestion of contaminated soil.

Bioavailable arsenic or lead (light circle ○)

Non-bioavailable arsenic or lead (dark circle ●)

A contaminant that is **not bioavailable** is not absorbed, and leaves the body.

Bioavailability

- A measure of the amount of lead absorbed into bloodstream
- Important input in clean up level



Integrated Exposure Uptake Biokinetic (IEUBK) Model

Predicts blood lead levels in children resulting from environmental exposures.

Utilized by EPA to set cleanup goals for lead in soil.

Children Are Often More Vulnerable to Site Chemicals	
<p>They can swallow dirt when they play</p> 	<p>The same "dose" of a chemical has a greater effect on a smaller person due to lower body weight</p> 



Best Practice: Site-specific Clean-up Levels for Lead

- ◆ Use site-specific lead bioavailability in the IEUBK model
- ◆ ↑BA will ↓health-based clean-up level
- ◆ IEUBK default BA = 30%
- ◆ In this case, 33 soil samples were analyzed for lead bioavailability
- ◆ Chattanooga site soils BA = 29-50%; mean = 36%
- ◆ Other updated inputs to IEUBK used, esp. target blood lead level and ingestion rate



SOP for *In Vitro* Lead and Arsenic Testing



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAY - 5 2017

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NOW THE
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EMERGENCY MANAGEMENT

MEMORANDUM

SUBJECT: Release of Standard Operating Procedure for an In Vitro Bioaccessibility Assay for Lead and Arsenic in Soil and Validation Assessment of the In Vitro Arsenic Bioaccessibility Assay for Predicting Relative Bioavailability of Arsenic in Soils and Soil-like Materials at Superfund Sites

Standard Operating Procedure... OLEM, May 5, 2017



Conclusion of Chattanooga Soil Study

- ✓ Elevated lead is not “everywhere; can distinguish between suspect material and urban background
- ✓ Data supports risk management decisions
- ✓ Unacceptable risk at some properties
- ✓ Removal warranted at some properties
- ✓ Remedial action planned
- ✓ Site-specific cleanup level “options” developed



Q & A

