U.S. EPA Superfund Remedial Program's Addressing of Radioactive Contamination



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DISCLAIMER

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EPA Addresses Site Cleanup Under Several Laws, Programs

This talk discusses only the Comprehensive Environmental Response, Compensation & Liability Act, CERCLA or "Superfund"
National Contingency Plan (NCP) is regulation for CERCLA
National Priorities List (NPL) guides EPA's remedial program on which sites need further attention

QACOMP-ENVIER-CERCIA	ister	Thursday 1990 March 8, 1990	
SUPERFUND	Ireg	Part II Environmental	
	dera	Protection Agency 40 GFR Part 300 Matinati Oli and Matardous Substances Pollution Contingency Plan; Pinal Rule	
December 31, 2002 40	fe		



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Purpose

 Describe EPA framework for addressing radioactively contaminated Superfund sites, including:
 » Provide brief description of CERCLA remedial program process
 » Provide overview and comparison of key EPA CERCLA remedial program guidance and tools that specifically address radionuclides

Note -- Radionuclides are also addressed with other hazardous substances under general EPA CERCLA guidelines



CERCLA Programs

Removal actions – short-term response actions
 »Emergency

- »Time-Critical
- »Non-Time Critical (addressed by remedial program)
- Remedial long-term response actions (focus of this talk)





What does a Superfund Site look like?

There are many different types of Superfund sites.
 » See following 4 pages for examples of radioactively contaminated sites.



Nuclear Metals Inc. - Massachusetts





Abandoned Uranium Mines Project – Navajo Nation





Welsbach/General Gas Mantle – New Jersey



Hanford – D Reactor / DR Reactor Remediation



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How to Address Radiation in a Chemical Program?

- With only approximately 66 radioactively contaminated NPL sites out of 1,789 total, the focus of the Superfund remedial program has been on chemicals.
- Question: How best address radiation?
- Answer: Address radiation in a consistent manner with chemicals, except to account for the technical differences posed by radiation.
 - »Radiation easily fits within Superfund framework
 - » Improves public confidence by taking mystery out of radiation

»Radioactively contaminated NPL sites also have chemical contamination



Why Does Radiation Easily Fit within the Superfund Remedial Program's Framework?

- Primary effect is cancer
- People ingest, inhale, eat, same amount of contaminated dust and food whether it is chemical or radioactive contamination
- Dust gets resuspended the same whether it is chemically or radioactively contaminated
- Inorganic elements move through the subsurface whether they are radioactive or not



Part 1. Regulatory Framework





Nine CERCLA Remedy Selection Criteria

- ♦ Two threshold criteria (both must be met)
 - 1. Protect human health and the environment
 - 2. Comply (attain or waive) with other federal and state laws: Applicable or Relevant and Appropriate Requirements (ARARs)
 - Protect current or future sources of drinking water (e.g., attain MCLs or more stringent state standards)





Nine CERCLA Remedy Selection Criteria (continued)

- ♦ 6 CERCLA ARAR waivers
 - 1. Interim Measure
 - 2. Greater Risk to Health and the Environment
 - 3. Technical Impracticability
 - 4. Equivalent Standard of Performance
 - 5. Inconsistent Application of State Requirements
 - 6. Fund Balancing







Nine CERCLA Remedy Selection Criteria (continued)

- Five balancing criteria (used to evaluate between potential remedies that meet threshold criteria)
 - 1. Long-term effectiveness and permanence
 - 2. Reduction of waste toxicity, mobility, or volume
 - 3. Short-term effectiveness
 - 4. Implementability
 - 5. Cost



Nine CERCLA Remedy Selection Criteria (continued)

- Two modifying criteria (information from public comment period that may modify remedial action)
 - 1. State acceptance
 - 2. Community acceptance





CERCLA Cleanup Levels

- ♦ ARARs often determine cleanup levels
- Where ARARs are not available or protective, EPA sets site-specific cleanup levels that
 - » For carcinogens, represent an increased cancer risk of 1×10^{-6} to 1×10^{-4}
 - —10⁻⁶ used as "point of departure"
 - —PRGs are established at 1 x 10^{-6}
 - » For non-carcinogens, will not result in adverse effects to human health (hazard index (HI) <1 is protective)</p>
- ♦ Address ecological concerns
- ♦ To-be-considered (TBC) material may help determine cleanup level



CERCLA Cleanup Levels Are <u>NOT</u> Based On

NRC decommissioning requirements (e.g., 25, 100 mrem/yr dose limits) 10 CFR 20 Subpart E

» If used as an ARAR, 10⁻⁶ still used as point of departure, and 10⁻⁴ to 10⁻⁶ risk range must be met

 Guidance outside risk range and/or if expressed as a dose (# mrem/year). This includes:

» DOE orders, NRC guidance (e.g., NUREGs), ICRP guidance, IAEA guidance, NCRP guidance, ANSI/HPS guidance, EPA/DHS PAGs, and Federal guidance



Common Rad ARARs

Radium and thorium in soil (40 CFR Part 192 (UMTRCA))
 » 5 pCi/g [0.185 Bq/g] over background
 » risk is probably used for radium/thorium sites than this ARAR

Radon in buildings (40 CFR Part 192 (UMTRCA))
 » 0.02 working levels of radon-220 and -222 decay products

Outdoor radon (40 CFR Part 192 (UMTRCA) 40 CFR Part 61 (CAA))
 » 20 pCi/m²-s [0.74 Bq/m²-s] of radon-222



EPA

Common Rad ARARs (continued)

◆NRC Low Level Waste (10 CFR Part 61 (AEA))

» 25 mrem/yr [0.25 mSv/yr] whole body, 75 mrem/yr [0.75 mSv/yr] to the thyroid, and 25 mrem/yr [0.25 mSv/yr] to any critical organ other than the thyroid

—This is different dose methodology than 25, 100 mrem/yr [0.25, 1 mSv/yr] NRC decommissioning standard

State water quality standards



Common Rad ARARs (continued)

♦ Federal drinking water MCLs (40 CFR Part 141 (SDWA))

- » 5 pCi/l [0.185 Bq/l] of radium-226 and -228 combined
- » 4 mrem/yr [0.04 mSv/yr] from beta particles and photon emitters to total body or any internal organ
- » 15 pCi/I [0.555 Bq/I] for gross alpha particle activity (excluding radon and uranium)
- » 30 micrograms per liter of uranium

◆ Uranium in groundwater (40 CFR Part 192 (UMTRCA))

» 30 pCi/l [1.11 Bq/l] of uranium-234 and -238 combined

State MCLs if more stringent than federal



Part 2. Guidance and Models for EPA staff





Site consistency

To help facilitate compliance with NCP and cleanup sites, EPA Headquarters provides:

- » Guidance documents
- » Models (calculators)

» Training (on-line developed with U.S. State led ITRC workgroups, classroom with ORNL)

»16 Annual Meetings with EPA Regions

Guidance, models, training are available for free on the internet



Guidance: CERCLA Cleanup

Establishment of Cleanup Levels for CERCLA Sites with Radioactive Contamination (8/22/97) OSWER Directive 9200.4-18

 Radioactive contaminants at CERCLA sites are governed by the NCP like all other contaminants

- » Cleanups based on ARARs or risk range
- » Groundwater restored to beneficial reuse
- » Use reasonably anticipated land use



Guidance: UMTRCA Soil ARAR

- Use of Soil Cleanup Criteria in 40 CFR Part 192 as Remediation Goals for CERCLA sites (2/12/98) OSWER Directive 9200.4-25
- ♦ Guidance on radium and thorium subsurface soil cleanup levels
- Attain 5 pCi/g [0.185 Bq/g], not 15 pCi/g [0.555 Bq/g], in subsurface
 - » 15 pCi/g [0.555 Bq/g], is "finding tool" for UMTRCA sites where subsurface contamination is high,
 - » and was expected to achieve 5 pCi/g [0.185 Bq/g] or less, therefore
 - » 15 pCi/g [0.555 Bq/g], is "relevant and appropriate" at CERCLA sites only when it will achieve 5 pCi/g [0.185 Bq/g] or less EPA

Risk-based Cleanup Levels for Radioactive Contamination

Radiation cleanup levels expressed as risk levels, <u>not</u> mrem [mSv]

Superfund uses "slope factors" (risk coefficients) instead of dose conversation tables to estimate cancer risk from radioactive contaminants

» Use slope factors that are in the EPA PRG risk assessment models



2014 Risk Assessment Q&A

Adiation Risk Assessment at CERCLA Sites: Q&A (5/2014)
 OSWER Directive 9200.4-40

 Provides overview of current EPA guidance for radiation risk assessment

Written for users familiar with Superfund but not radiation



Update Policies Based on Newer Science, cont.

- To comply with UMTRCA indoor radon standard as an ARAR, users may assume the following concentrations correspond to 0.02 Working Levels:
 - »5 pCi/l of Rn-222
 - »7.5 pCi/l of Rn-220
 - » This policy has been superseded by the RVISL calculator

The methodology for making these conversions is discussed in ICRP "Lung Cancer Risk from Radon and Progeny"



More consistency on Risk Assessments (Rad & Chem)

Reiterate more strongly that risk assessments (e.g., models used) should be consistent with chemicals at site and with other regional sites

 Don't use a steady state model for chemicals and a transfer/dynamic model for radionuclides
 » Don't use RSL calculator for chemicals and RESRAD for radionuclides



More consistency on Surveys (Rad & Chem)

Reiterate more strongly that site surveys (e.g., characterization and confirmation) should be consistent with chemicals at a site and with other regional sites

Don't use not-to-exceed (NTE) for chemicals and area averaging (AA) for radionuclides for residential

» Don't use NTE for residential cleanup of chemicals but AA approach like MARSIMM for the radionuclides



Guidance: Rad SSG

- Soil Screening Guidance for Radionuclides [rad SSG] documents (10/00) OSWER Directives 9355.4-16A and 9355.4-16
 - » User Guide
 - » Technical Background Document
- Guidance to screen out areas, pathways, and/or radionuclides early in the process
- ♦ Consistent with 1996 chemical SSG
 - > 1 x 10⁻⁶ and MCLs (leaching from soil)
 - » Residential land use
 - » Survey procedures for site characterization
 - » Evaluates 5 soil to groundwater models
 - Accounts for technical differences of radiation
 EPA





Guidance: Rad PRG Calculator

♦ Calculator to establish PRGs, when:

» ARAR is either not available or sufficiently protective (e.g., 25 mrem/yr [0.25 mSv/yr] or more)

 Electronic equations (risk and leaching to groundwater) also are on the Internet

» 1x10⁻⁶ and MCLs (leaching from soil)

» Accounts for technical differences of radiation (e.g., gamma, plant uptake)





Guidance: Rad PRG Calculator (continued)

Ten scenarios/land uses available

- 1. Residential
- 2. Agricultural
- 3. Indoor workers
- 4. Outdoor workers
- 5. Fish ingestion

- 6. Tap water
- 7. Soil to groundwater
- 8. Air
- 9. Recreator
- 10. Construction worker

Chemical RSL equations should be used for chemical toxicity of uranium

- EPA developed Internet-based training with States (ITRC) on calculator and radiation risk assessment
 - » http://www.clu-in.org/conf/itrc/rads_051507/ EPA

Guidance: ARAR Dose Calculator

 Calculator to establish Dose Compliance Concentrations (DCC) for single dose limit ARARs requiring a dose assessment

◆Ten scenarios/land uses available

- 1. Residential
- 2. Agricultural
- 3. Indoor workers
- 4. Outdoor workers
- 5. Fish ingestion

- 6. Tap water
- 7. Soil to water
- 8. Air
- 9. Recreator
- 10. Construction worker

Equations similar to those for the PRG calculator, except dose conversion factors are used instead of slope factors



PRG and DCC – Farmer and Resident Produce Categories

♦ 25 specific subcategories of produce. 23 are used in default mode.

- » Apples, Asparagus, Beets, Berries, Broccoli, Cabbage, Carrots, Cereal Grains, Citrus Fruits, Corn, Cucumbers, Lettuce, Lima Beans, Okra, Onions, Peaches, Pears, Peas, Peppers, Potatoes, Pumpkin, *Rice*, Snap Beans, Strawberries, Tomatoes
- Mass loading factors (MLFs) for each produce subcategory (25 MLFs)
- Child and Adult ingestion rates for all 25 categories

» Both for fresh weight (if site has sensitive populations) and more typical ingestion rate with cooking and preparation loss



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PRG and DCC – Farmer and Resident Produce Categories, cont.

◆User is able to select:

» four climate zones (temperate, subtropical, tropical, humid).

- » Seven soil (default, sand, loam, clay, organic, coral sand, other)
- If climate/soil specific transfer factors for that element/produce category are available from IAEA, then the correct factor will be selected



Handbook of Parameter Values for the Prediction of Radionuclide Transfer in Terrestrial and Freshwater Environments



PRG and DCC – Farmer and Resident Produce Categories, cont.

- Users are able to select "Show Individual Produce PRG Output"
 - » This shows results for PRGs for every produce category selected
 - —Enables user to see which categories are driving produce results





PRG and DCC – Farmer Animal Categories

◆Ten animal products

» beef, dairy, swine, poultry, eggs, finfish, shellfish, goat milk, sheep milk, goat meat, sheep meat

» Child and Adult ingestion rates for all 10 categories

—Both for fresh weight (if site has sensitive populations) and more typical ingestion rate with cooking and preparation loss



PRG and DCC – Farmer Poultry sub Categories

In the farmer scenario, four types of poultry (chicken, duck, turkey, or goose) may be selected.

- » This changes the ingestion intake rates for the farm animal
 - —Fodder
 - -Water
 - —Soil





Guidance: Building PRG (BPRG) Calculator

- Calculator to establish 1x10⁻⁶ risk based PRGs for the reuse of radioactively contaminated buildings.
 - Equations and parameters are derived from latest EPA chemical methodology (e.g., assessment at WTC)
 - » Adjusted to account for technical differences posed by radiation
- EPA and ITRC Internet-based training on BPRG calculator and D&D
 - » http://www.clu-in.org/conf/itrc/radsdd_040308/





Guidance: Building PRG (BPRG) Calculator (continued)

♦BPRG calculator includes 2 land use scenarios

- » Residential
- » Indoor worker
- Both land uses include 3 exposure media
 - » Settled dust
 - » Ambient air
 - » Direct external exposure



- -5 Room sizes and 4 receptor locations, both
 - -Surface
- EPA-Volumetric

Building Dose Cleanup Concentrations (BDCC) ARAR Dose Calculator

- <u>BDCC Purpose</u>: to establish BCCs for Inside Buildings for single dose limit ARARs (# mrem/yr)
- ◆BDCC includes 2 land use scenarios (Residential, Indoor Worker)
- 2 land uses include 3 exposure media (Settled dust, Fixed Direct External 3-D, Ambient Air)
- Equations similar to those used for BPRG calculator, except dose conversion factors used instead of slope factors





BPRG/BDCC Surface Factors for Rooms (F_{surf}) – Room Material

♦7 Room Materials for each receptor locations and room sizes

- » Adobe
- » Composite 1 room material = drywall room, glass window, wooden doors, drywall walls, concrete floor, drywall ceiling
- » Composite 2 room material = concrete room, wooden doors, concrete floor, drywall ceiling
- » Concrete
- » Drywall
- » Glass
- » Wood



Surfaces PRG (SPRG) Calculator

- Establish 1 x 10⁻⁶ risk based PRGs for radioactively contaminated outside hard surfaces (e.g., slabs, pavement, sidewalks, sides of buildings)
- Derived from rad PRG and BPRG calculators





SPRG Exposure Scenarios

◆SPRG includes 3 land use scenarios

» Residential

»Indoor Worker

» Outdoor Worker

♦3 land uses include 3 exposure media

» Settled dust (pave and unpaved street level)

» Fixed Direct External 3-D (street level)

—Surface and Volumetric

» Fixed Direct External 2-D (slabs)

EPA Surface and Volumetric



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Surface Dose Cleanup Concentrations (SDCC) ARAR Dose Calculator

- <u>SDCC Purpose</u>: to establish DCCs for Outside Hard Surfaces for single dose limit ARARs (# mrem/yr)
- SDCC includes 3 land use scenarios (Residential, Indoor Worker, Outdoor Worker)
- ♦3 land uses include 3 exposure media (Settled dust, Fixed Direct External 3-D, Fixed Direct External 2-D (slabs))
- Equations similar to those used for SPRG calculator, except dose conversion factors used instead of slope factors

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Mechanically Driven PEF

Default based on California Urban Highway, other choices

» State specific
 » Site-specific
 —Paved
 —Unpaved





Mechanically Driven PEF: State-Specific

◆Select a state \diamond Select a geographic setting (urban or rural) Select a roadway class (6 choices)

Urban

1. Interstate

2. Freeways and

- Expressways 3. Other Principal Arterial
- 4. Minor Arterial
- 5. Collector
- 6. Local

Rural

1. Interstate 2. Other Principal Arterial 3. Minor Arterial 4. Major Collector5. Minor Collector 6. Local Collector



Determining Road Class: DOT MAP



Radon Vapor Intrusion Screening Level (RVISL) Calculator

- Internet calculator tool developed to provide concentrations of radon and thoron in soil and groundwater that will not result in radon intrusion into buildings that exceed target levels
- Indoor Rn-222, Rn-220, and Rn-219 target level concentrations based on:
 - »Risk (default to 1 x 10-6)
 - » UMTRCA (only Rn-222 and Rn-220) correspond to 0.02 Working Levels
 - » Dose (default to 1 mrem/yr)

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This figure depicts the migretion of readon (Re) in soil gas from redioactively contaminated soil and groundwater into buildings at a Superfun ite. Redon in soil gas is shown to enter buildings through creaks in the foundation and openings for utility lines similar to other forms of contamination. Atmospheric conditions and building ventilation are shown to influence redox soil gas intrusion.

Welcome

Welcome to the "Redon Vapor Intrusion Screening Level (RUSL) calculator Home Fege for Redionuclide Contaminants at Superfind Sites". This website was developed with the Department of Energy's (DOE) Oak Ridge Helsonia Laboratory (ORNL) under an Intergency Agement with the U.S. Environmental Protection agency (EPA). The main purpose of this guidence is to provide RNUs calculation tool to assist risk sassasor, emedial project managers, and others involved with risk sassasmart and decision-making et Comprehensive Environmental Response, Comparasion, and Liability Act (CERCL4) sites in developing RVISLs or preliminary remediation gals (PR0s) for indoor Rn-222, Rn-220, and Rn-218 that ere risk or obseed and for having compliance with the UNITRCK indoor radon standards for Rn-222 and Rn-221.

he RNSL vestilis is now the generally recommended source of indoor reado screening levels (SLA) from radioactive contaminents at uperfund sites for all EPA egions. The RNSL calculator output provides screening velues and risk and dose estimates for residential and momercial/indukted reposures to radio in soil gas, air, and groundwate. The visified use of the RNSL to ascreen redoor at Superfund sites romotes national consistency. The RNSL uses the same detabase of twoicity values, chemical parameters, and inhelation exposure equation at the <u>PROS for Radionucide Contaminants at Superfund Sites</u> calculator. RNSLs are a type of PRO and both are a specific variety of the broa creating level (SL) category.

lote that for CERCLA remedial actions, dose assessment is generally done only to show compliance with a dose-based Applicable or televant and Appropriate Requirement (ARAR). FPM would recommend, where possible, Regions use measurements of radon indoors ather than rely on the transport portions of the RVISL. In particular, testing of groundwater or soil gas is not required to demonstrate ampliance with RVISL Working Levels (WL), risk, or dose targets.

The RVISL saleulator provides default permeters that can be modified to reflect site-specific conditions. In edition, the calculator present the option to compare the indiox of iconcentration, entered by the user ordered from groundnesser or all gas activities, to attact standard or Uranium Mill Tellings Redistion Control Act (UMTRCA) standards, which also may be potential ARARs. Below is a general description of SU for redion. If the calculator is used with non-default inputs in a decision on a Superfund site, it is recommended that the inputs be clearly identified and judiced by the user.

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EPA MNA for Inorganics Policy document – **Issued 2015**

Complement 1999 overall MNA policy document » Helps clarify policy issues unique to inorganics not addressed in 1999 ♦ Volume 3 ORD MNA for radionuclides serves as a technical support document for this policy document

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Directive 9283.1-36 August 201 Office of Solid Waste and Emergency Response

USE OF MONITORED NATURAL ATTENUATION FOR INORGANIC CONTAMINANTS IN GROUNDWATER AT SUPERFUND SITES

> U.S. Environmental Protection Agency Office of Solid Waste and Emergency Response Directive 9283.1-36

> > August 2015



EPA MNA Technical Guidance for Inorganics

- 3 Technical Reports "Monitored Natural Attenuation of Inorganic Contaminants in Ground Water"
 - » "Volume 1 Technical Basis for Assessment" 2007
 - » "Volume 2 Assessment for Non-Radionuclides Including Arsenic, Cadmium, Chromium, Copper, Lead, Nickel, Nitrate, Perchlorate, and Selenium" 2007
 - » "Volume 3 Assessment for Radionuclides Including Americium, Cesium, Iodine, Plutonium, Radium, Radon, Strontium, Technetium, Thorium, Tritium, Uranium" 2010







Guidance: Uranium in Groundwater

- Use of Uranium Drinking Water Standards Under 40 CFR 141 and 40 CFR 192 as Remediation Goals for Groundwater at CERCLA Sites (11/6/01) OSWER Directive 9283.1-14
- Guidance on the use of MCL and UMTRCA uranium standards as ARARs for groundwater
- When both standards are ARARs, must attain or waive both
 - 1. 30 micrograms per liter of total uranium
 - 2. 30 pCi/l [1.11 Bq/l] of uranium-234 and 238 combined
- Use MCL ARAR point of compliance for UMTRCA
- Includes a list of radionuclides under 4 mrem/year beta and 15 pCi/l [0.555 Bq/l] alpha MCLs



Part 3. Involving Stakeholders





Community Involvement

EPA has many tools to facilitate meaningful involvement by communities near sites

- EPA has 2 tools designed specifically for use at radiation sites
 - » EPA works with stakeholders to develop site-specific tools for local communities

Díí baa' ádahołchijh! Water from these wells* in Baca-

Prewitt-Haystack is NOT safe to drink





dvisory issued jointly by DiNEH Project and NNEPA-PWSSP

Dec. 2007, Rev. Feb., Mar. 2008 Call 505-262-1862 or 928-871-7755 or visit www.navajopublicwater.org



*Navajo Nation policy is that these wells are for livestock use only and are not to be used for human drinking water.



Toolkit: Radiation Risk Assessment

- Superfund Radiation Risk Assessment: A Community Toolkit (issued June 2014)
- Collection of 22 fact sheets for the general public. It contains fact sheets on
 - » Superfund and Radiation
 - » Superfund risk assessment process at radiation sites
 - » Each of the 6 PRG and DCC calculators
 - -RVISL fact sheet is on Home page for calculator
 - » Replacement for the Common Rad booklet fact sheets



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Video: Radiation Risk Assessment

- Superfund Radiation Risk Assessment and How you can Help, an Overview (3/05) OSWER Directive 9200.4-37
- ◆Video for the general public. It contains information on:
 - » The Superfund risk assessment process when addressing radioactive contamination
 - » How the public is involved site-specifically







For More Copies or Information

Guidance documents are on Superfund Radiation Webpage: »https://www.epa.gov/superfund/radiation-superfund-sites

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