U.S. EPA Superfund Risk Harmonization when addressing Chemical and Radioactive Contamination



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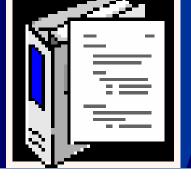


Presented to the
Panel on Worldwide Regulatory Oversight
of Radioactive Legacy Sites
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in Phoenix, AZ on 29 February, 2012



EPA Addresses Site Cleanup Under Several Laws, Programs

- Comprehensive Environmental Response, Compensation & Liability Act, CERCLA or "Superfund"
- National Contingency Plan (NCP) is regulation for CERCLA
- ◆National Priorities List (NPL) guides EPA on which sites need further attention





Purpose

- Provide brief description of CERCLA process
- Provide overview and comparison of key EPA CERCLA guidance and tools that specifically address radionuclides and their chemical precursor
 - » Radionuclides are also addressed with other hazardous substances under general EPA CERCLA guidelines



Superfund sites: Number and Progress

- **♦**1,279 NPL sites
 - » 56 are radiation sites
 - —55 of these 56 also have significant chemical contamination
- ♦61 mores sites proposed for NPL
 - » 1 is a radiation site
- ◆1,084 NPL sites have progressed to "construction completion"
 - » 37 are radiation sites



How to Address Radiation in a Chemical Program?

- With only 56 radioactively contaminated sites out of 1,279 total, the focus of the Superfund 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



Why Does Radiation Easily Fit within the Superfund 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. Technical Guidance & Tools



Nine CERCLA Remedy Selection Criteria – Two Threshold

- 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)



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 x 10⁻⁶ to 1 x 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)</p>
- Address ecological concerns
- To-be-considered (TBC) material may help determine cleanup level



CERCLA Cleanup Levels Are NOT 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



Risk-based Cleanup Levels for Radioactive Contamination

- ◆Radiation cleanup levels expressed as risk levels, not mrem [mSv]
- ◆ Superfund uses "slope factors" in Health Effects Assessment Summary Tables (HEAST) instead of dose conversation tables to estimate cancer risk from radioactive contaminants
 - » HEAST has been updated with new information from Federal Guidance 13
 - —Based on information in ICRP 72



Site consistency

- ◆To help facilitate compliance with NCP and cleanup sites, EPA Headquarters provides:
 - » Guidance documents
 - » Models (calculators)
 - » Training (developed with State led ITRC)
 - » 12 Annual Meetings with EPA Regions
- Guidance, models, training are available for free on the internet



Guidance: Risk Assessment Q&A

- ◆ Radiation Risk Assessment at CERCLA Sites: Q&A (12/99) OSWER Directive 9200.4-31P
- Provides overview of current EPA guidance for radiation risk assessment
- Written for users familiar with Superfund but not radiation
- ◆ Adds some new guidance
 - » Dose assessment only for ARAR compliance
 - » No dose-based TBCs (including No 15 mrem/yr [0.15 mSv/yr])
 - » Direct exposure rate may supplement sampling



Guidance: chemical SSG

- Soil Screening Guidance [SSG] documents (7 & 5/96)
 OSWER Directives 9355.4-23 and 9355.4-17A
 - » User Guide
 - » Technical Background Document
- Guidance to screen out areas, pathways, and/or chemicals early in the process
 - » 1 x 10⁻⁶ and MCLs (leaching from soil)
 - » Residential land use
 - » Survey procedures for site characterization
 - » Evaluates 9 soil to groundwater models



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





Guidance: Chemical RSL Calculator

- Calculator to establish Screening Levels/PRGs, when:
 - » ARAR is either not available or sufficiently protective
- ◆Electronic equations (risk and leaching to groundwater) also are on Internet
 - » 1x10⁻⁶ and MCLs (leaching from soil)
 - » Includes dermal exposure





Guidance: Chemical RSL Calculator (continued)

- Eight scenarios/land uses available
 - 1. Residential
- 5. Fish ingestion
- 2. Recreator
- 6. Tap water
- 3. Indoor workers 7. Soil to groundwater
- 4. Outdoor workers 8. Air

Includes chemical toxicity of uranium



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 Internet
 - » 1x10⁻⁶ and MCLs (leaching from soil)
 - » Accounts for technical differences of radiation (e.g., gamma, plant uptake)





Guidance: Rad PRG Calculator (continued)

- Eight scenarios/land uses available
 - 1. Residential
 - 5. Fish ingestion
 - Agricultural
 Tap water

 - 3. Indoor workers 7. Soil to groundwater
 - 4. Outdoor workers 8. Air
- Chemical SSL Internet 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/



Guidance: ARAR Dose Calculator

- Calculator to establish Dose Compliance Concentrations (DCC) for single dose limit ARARs requiring a dose assessment
- Eight scenarios/land uses available

 - 1. Residential 5. Fish ingestion
 - 2. Agricultural 6. Tap water
 - 3. Indoor workers 7. Soil to water
 - 4. Outdoor workers 8. Air
- Equations similar to those used for PRG calculator, except dose conversion factors used instead of slope factors



RSL, PRG, DCC, Similar Look and Feel

Using the RSL Calculator Select Scenario Resident Composite Worker (presented in Generic Tables) O Indoor Worker Outdoor Worker O Fish Soil to Groundwater Recreator (Site Specific only) Select Media: Soil Air Tapwater Select SL type Defaults O Site Specific Select RfD/RfC Type: Chronic Subchronic **Select Individual Chemicals** Selected Trimethyl Phosphate Uranium (Soluble Salts) Trimethyl-4-Propenylnaphthalene, 1,2,3-Trimethylbenzene, 1,2,3-

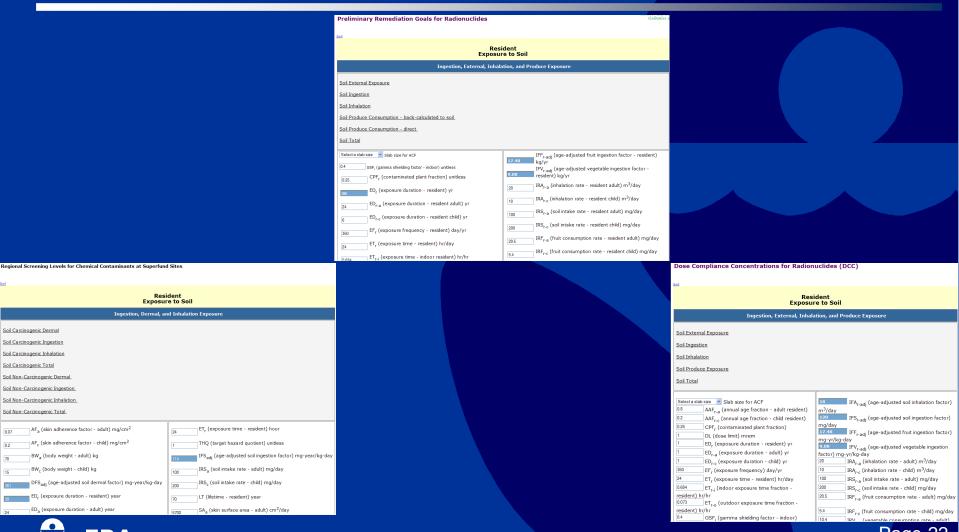
Using the PRG (Calculator
Select Scenario	
ResidentIndoor WorkerOutdoor WorkerComposite WorkeFarmer	r
Select Media: Soil Air Tap Water Soil to Groundwater Fish	re
Select PRG type	
DefaultsSite Specific	
Select Units	
⊙ pCi ○ Bq	
Select Individual Isotopes	
Complete List	Selected U-234 U-235+D





Trimethylbenzene, 1,2,4-

RSL, PRG, DCC, **Consistent Exposure Assumptions**





RSL, PRG, DCC Consistent treatment of inorganics

- ◆Resuspension same
- ◆Soil to groundwater same
- ◆All 3 steady state models. Not depleting source (transfer/dynamic) models



EPA/ITRC Radiation Risk Training

- Four modules provide:
 - 1. Background and Regulatory Case Studies
 - 2. Existing Practices in Radiation Risk Assessment
 - 3. Use of Radiation PRG Calculator (tutorial on using PRG and ARAR dose calculator)
 - 4. Case Study Application for PRG Calculator



EPA/ITRC Radiation Risk Training, cont.

- Eight Live Internet rad CERCLA Policy Training sessions have been conducted
 - » 1,047 total participants, including 165 EPA employees
- An archived version of a live training session is available at:
 - » http://www.clu-in.org/conf/itrc/rads_051507/
- Archived version was accessed by users 1,710 times between January 1, 2008 and August 26, 2009.



Guidance: World Trade Center (WTC) Benchmark

- Document used to establish 1x10⁻⁴ risk based cleanup levels for the reuse of chemically contaminated buildings after the 9/11 attacks.
- Equations and parameters were the latest EPA chemical methodology
- Ingestion, inhalation, and dermal
 - » http://www.epa.gov/wtc/reports/contaminants_ of_concern_benchmark_study.pdf





Guidance: World Trade Center (WTC) Benchmark (continued)

- WTC benchmark document includes 1 land use scenario
 - » Residential
- ◆This land use includes 2 exposure routes
 - » Settled dust
 - » Ambient air





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/



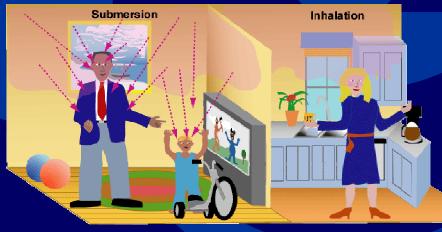


Guidance: Building PRG (BPRG) Calculator (continued)

- ◆BPRG calculator includes 2 land use scenarios
 - » Residential
 - » Indoor worker
- Both land uses include 3 exposure routes
 - » 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

- ◆BDCC Purpose: 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 routes (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





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 routes
 - » Settled dust (pave and unpaved street level)
 - » Fixed Direct External 3-D (street level)
 - —Surface and Volumetric
 - » Fixed Direct External 2-D (slabs)
 - —Surface and Volumetric





Surface Dose Cleanup Concentrations (SDCC) ARAR Dose Calculator

- SDCC Purpose: 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 routes (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

EPA/ITRC Radiation D&D Training

- Four modules provide:
 - 1. Introduction and Regulatory Basis for D&D
 - 2. Factors for Implementing D&D
 - 3. Preliminary Remediation Goal (PRG) Calculators (tutorial on using BPRG, SPRG, BDCC, and SDCC calculators)
 - 4. Case Studies and Lessons Learned



Radiation D&D Training, cont.

- ◆ Five Live Internet rad CERCLA Policy Training sessions have been conducted
 - » 731 total participants, including 101 EPA employees
- An archived version of a live training session is available at:
 - » http://www.clu-in.org/conf/itrc/radsdd_040308/
- ◆ Archived version was accessed by users 2,046 times between January 1, 2008 and August 26, 2009.



Tools and Guidance under Development

- 1. Radionuclide Ecological Benchmark calculator
- 2. MNA for inorganics (metals and radionuclides)
- 3. Counts per minute calculator



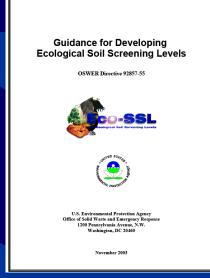


Radionuclide Ecological Benchmark (REB) Calculator

 Establish risk-based Biota Concentration guides (BCGs), or ecological benchmarks, for radioactively contaminated sites

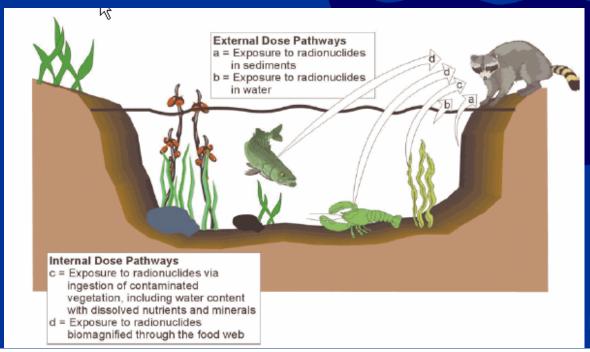
- Fits with Superfund framework for developing eco benchmarks
- Derived from DOE Graded Approach guidance
 - Includes same dose levels for tissue death
 - » Strong recommendation to look at chemical eco effects





REB Exposure Scenarios

- Includes 12 animal or plant benchmark scenarios
 - » 6 generic composite only
 - » 6 species-specific/site-specific





MNA for Inorganics (metals and radionuclides) Policy document

Will complement 1999 overall MNA policy document "Use of Monitored Natural Attenuation at Superfund, RCRA Corrective Action, and Underground Storage Tank Sites"



- » Will help clarify policy issues unique to inorganics not addressed in 1999
- ◆ 3 Volume ORD MNA for inorganics documents will be technical support document for this policy document
 - » Also complemented by 2010 ITRC guidance on MNA for inorganics



Technical Background Documents for MNA 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, Technecium, Thorium, Tritium,

Uranium" 2010







CPM Calculator Scenarios

- The CPM calculator has three major sub calculators based on the field survey scenario:
- 1. Ground based scanning of surface contamination
- 2. Ground based scanning of volumetric contamination (under development)
- 3. Air based scanning of contamination (under consideration)



CPM tool caveats

- The CPM tool is intended to facilitate use of Real-Time measurement techniques to supplement sampling NOT replace sampling
- The CPM tool only addresses gamma emitters
- ◆ The CPM tool assumes uniform contamination





Part 2. Communication within EPA



Meetings with EPA Staff

- ◆EPA has had 12 annual meetings with regional & HQ staff who work on radiation sites, to discuss:
 - » Lessons learned (things not to repeat)
 - » Success stories (things to do again)
 - » Need for new guidance/tools
- Regional staff determine agenda
- Meeting co-hosted by HQ lead staff on:
 - radiation issues and
 - 2. general remedy selection issues



Email Lists

- ◆EPA HQ maintains email list of regional staff working on radiation sites, to distribute:
 - » Draft guidance for comments
 - » Final guidance
 - » Queries to assist in site-specific issues



Internet

◆All guidance (documents, models) on CERCLA radiation approach are on the internet http://www.epa.gov/superfund/health/contaminants/radiation/index.htm



Part 3. Involving Stakeholders



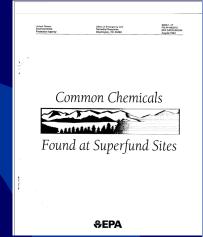
Community Involvement

- EPA has many tools to facilitate meaningful involvement by communities near sites
- EPA hosts a community involvement national conference
- ◆EPA has 2 tools designed specifically for use at radiation sites that are based on earlier tools for chemical sites



Booklet: Common Chemicals

- ◆ Common Chemicals Found at Superfund Sites (8/94) OSWER Directive 9203.1-17
- ◆Booklet for the general public. It contains information on
 - » Health effects of chemicals commonly found at Superfund sites
 - EPA policies for cleaning up these chemicals
 Note this booklet has been superceded by a website





Booklet: Common Radionuclides

- ◆ Common Radionuclides Found at Superfund Sites (7/02) OSWER Directive 9200.1-34
- ◆Booklet for the general public. It contains information on
 - » Health effects of radionuclides commonly found at Superfund sites
 - » EPA policies for cleaning up these radionuclides





Video: Chemical Risk Assessment

- ◆ Superfund Risk Assessment and How you can Help, an Overview (1999) OSWER Directive 9285.7-29A
- Video for the general public. It contains information on:
 - » The Superfund risk assessment process when addressing chemical contamination
 - » How the public is involved site-specifically

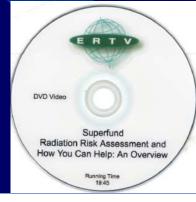




Video: Radiation Risk Assessment

- ◆ 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





Part 4. Relevance of Superfund Approach to International Radiation Community



Role of International Information in Superfund

- EPA does not use risk management framework used by ICRP/IAEA and most other agencies addressing radiation
- However, EPA does use technical information from international guidance
 - » EPA PRG calculator uses IAEA transfer coefficients
- Material in EPA guidance/tools is freely available and may be used in international (e.g., IAEA, other country) guidance



How can EPA guidance & tools be used directly?

- ◆Ideal for radiation/chemical risk comparisons at mixed waste sites
 - » Most chemical site cleanup programs have cleanup levels similar to EPA's cancer risk range (10⁻⁴ to 10⁻⁶)
 - » Can change default input parameters in PRG/DCC calculators to match up with those used by chemical program in your country



International Information Sharing

- ◆Representatives from France, UK, Russia, Australia, Iraq, and Norway (RSL chair) have presented at EPA internal meeting and conducted site visits
- ◆French ASN hosted EPA visit of 3 French sites
- ◆UK EA hosted EPA RPM for SRS visit to Sellafield for one week
- ◆UK EA hosted EPA RPM for Livermore site working at Sellafield for 6 months



For More Copies or Information

- Guidance documents are on Superfund Radiation Webpage:
 - » http://www.epa.gov/superfund/health/contaminants/radiation/index.htm

EPA/ITRC training on EPA Superfund radiation approach

- » http://www.clu-in.org/conf/itrc/radscleanup_060507/
- Guidance documents for overall cleanup level issues are on Superfund Remedy Decisions Webpage:
 - » http://www.epa.gov/superfund/policy/remedy/sfremedy/index.htm
- For further information or questions, Stuart Walker
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