Investigation of State Approaches to Assessing Indoor

Contaminated Dust

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Section 1: Introduction

The objective of this project was to collect information on evaluating the risk to residents and workers from contaminated dust from inside of a building. The hope of collecting this information was that it could potentially be used to update the Superfund program's default parameters for human health risk assessment when it comes to ingesting contaminated dust inside of a building. The United States Environmental Protection Agency (EPA) developed the Building Preliminary Remediation Goals (BPRG) calculator for estimating human health risk from the ingestion of radioactively contaminated dust indoors. The BPRG calculator may be found here: https://epa-bprg.ornl.gov/. The development of this calculator was based on the risk assessment for the cleanup of chemically contaminated dust after the World Trade Center incident, which may be found here: https://epa-bprg.ornl.gov/documents/copc_benchmark.pdf. For dose assessment, when a dose-based standard is determined to be an Applicable or Relevant and Appropriate Requirement (ARAR) at a CERCLA site, EPA has also developed the Building Dose Compliance Concentrations (BDCC) calculator that has consistent parameters with the BDCC calculator and may be found here: https://epa-bdcc.ornl.gov/.

Information was collected on the default models and guidance in place for assessing contaminated, both chemically and radioactivity, dust indoors from different departments across the 50 states. These models could include assessing risk from dust contaminated with radiation, chemicals, PCBs, pesticides, methamphetamine, or other contaminants. Additionally, any information the departments could provide on sampling and survey methods was included. Most communication with state departments was mostly done through email, with a few phone and video calls as well. The information provided by each state is provided in the sections below along with contact information for the respondents.

Section 2: Approach for Assessing Indoor Radioactively Contaminated Dust by State

Across the United States, approaches to radioactive dust cleanup vary by state, with some states utilizing specific federal or state guidelines, while others rely on collaboration with federal agencies. States like Alaska and Indiana, which are non-agreement states, have their radioactive materials regulated by the Nuclear Regulatory Commission (NRC). Many states, including Arkansas, California, Idaho, Illinois, Louisiana, Michigan, Ohio, and Pennsylvania, use RESRAD-BUILD software to assess and manage radioactive contamination. Colorado and Iowa follow NUREG-1757 and MARSSIM guidance for decommissioning and radiological surveys. Connecticut employs NRC reg guide 1.86 initially and may progress to using RESRAD-BUILD as needed, while Delaware coordinates risk assessments between state offices and uses MARSSIM and RESRAD-BUILD. Some states like Massachusetts and Minnesota contract out cleanup work, and others like Texas have a comprehensive approach using multiple software and guidelines, including EPA Protective Action Guides (PAGs) and RESRAD. Additionally, states like New York use RESRAD or PRG calculators, and South Carolina uses the EPA Regional Screening Level Calculator for exposure assessments. Given the wide variety of models and guidelines used across the country, the following table has been compiled to provide what each specific state uses or would use in the event of a cleanup involving radioactivity contaminated dust. Departments that handle, or were expected to be involved in, the cleanup activities for radioactive dust from all 50 states were contacted. This was usually through email, but also involved phone calls. Contact information was found on organization websites. We received no reply from 20 states. Due to this, the information provided is not comprehensive, but provides a decent overview on what measures are in place across the country in regard to radioactive dust indoors. Contact information is provided for a representative from each state that responded to

our query. States highlighted yellow did not provide a response while states that are highlighted blue responded but either did not have anything specific in place or it was unclear if any guidance was in place.

Table 1: Radioactive Dust Models and Guidance by State

State	Guidance/Model	Cleanup Specifics	Contact
Alabama			
Alaska	Non-agreement state; NRC guidance		Irene Casares- irene.casares@ alaska.gov - Alaska Department of Health
Arizona			
Arkansas	RESRAD-Build		
California	RESRAD-Build		John Fassell - john.fassell@c dph.ca.gov - California Department of Public Health
Colorado			
Connecticut	NRC reg guide 1.86 and RESRAD-Build	Would start with NRC reg guide 1.86 and potentially move on to RESRAD BUILD if needed	Michael Firsick - michael.firsick @ct.gov - Connecticut Department of Energy & Environmental Protection

State	Guidance/Model	Cleanup Specifics	Contact
Delaware	10 CFR § 20.1402, MARSSIM, and RESRAD- BUILD	The risk assessment would be a coordinated effort between the Office of Radiation Control and DNREC (Hazmat). The standard would be 10 CFR § 20.1402 Radiological criteria for unrestricted use. The EPA Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) provides detailed guidance on how to demonstrate that a site is in compliance with a radiation dose- or risk-based regulation. The RESRAD-BUILD code is approved by NRC for use to evaluate contaminated buildings involved in decommissioning and license termination. Also, the clean-up would be done through approved vendors and clearance sampling.	Brinsfield - robert.brinsfiel d@delaware.g ov - Delaware Department of
Florida			
Georgia			
Hawaii	MARSSIM		Geoffrey Laugeoffrey.lau@doh.hawaii.gov - State of Hawaii Department of Health
Idaho	RESRAD-Build	If it were an emergency response to a release, we would have the Civil Support Team or Department of Energy RAP Team 6 respond for initial assessment and characterization.	Austin Landry - austin.landry@ deq.idaho.gov - Idaho Department of Environmental Quality

State	Guidance/Model	Cleanup Specifics	Contact
Illinois	RESRAD-Build	RESRAD-BUILD and other RESRAD suite programs for validating remediation goals, with potential use of models within the RAMP gateway for validating sampling plans and characterizing doses from remediation.	Adnan- Khayyat - adnan.khayyat @illinois.gov - Illinois Emergency Management Agency and Office of Homeland Security
Indiana	Non-agreement state, NRC		
Iowa	MARSSIM	MARSSIM and this would be our first resource for guidance to determine an area's radiological status and provide necessary data to support license determination (i.e. release criteria 25 mrem/yr). Additionally, we could reach out to other regulators (NRC, Agreement State) for additional consultation if needed.	Stuart Jordan - stuart.jordan@idph.iowa.gov - Iowa Department of Health and Human Services
Kansas			
Kentucky			
Louisiana	RESRAD-Build	Would also refer to any applicable documents, look at half-life of the isotope, and any other critical information.	James Pate - james.pateiii@ la.gov - Louisiana Department of Environmental Quality
Maine			
Maryland			
Massachusetts	No specific models or guidance in place	This type of work would be contracted out	John Priest- jack.priest@m ass.gov - Massachusetts Department of

State	Guidance/Model	Cleanup Specifics	Contact
			Health
Michigan	RESRAD Build and MARSSIM		T.R. Wentworth II - wentwortht@ michigan.gov - Michigan Department of Environment, Great Lakes, and Energy
Minnesota	NUREG 1757 Volume 1, 2, and 3, MARSSIM, and MARSAME	Actual remediation would be performed by a third party, or other state resource capable of dealing with hazardous (specifically radioactive) material.	Tyler Kruse - tyler.kruse@st ate.mn.us - Minnesota Department of Health
Mississippi	Subchapter 4, 10 CFR Part 20, Appendix B of the Mississippi State Department of Health Regulations for Control of Radiation	https://www.nrc.gov/reading-rm/doc-collections/cfr/part020/part020-appb.html	Jeffrey Algee - jeffrey.algee@ msdh.ms.gov - Mississippi State Department of Health
Missouri			
Montana			
Nebraska	No regulations, guidance, or risk assessment methodologies for radiological contamination in dust that are specific to Nebraska		Doug Gillespie - Doug.Gillespie @nebraska.go v and LeAnna Norquest - LeAnna.Norqu est@nebraska. gov - Nebraska Department of Health and Human

State	Guidance/Model	Cleanup Specifics	Contact
			Services
Nevada			
New Hampshire	He-P 4001-4097	State specific guidance - https://www.dhhs.nh.gov/programs- services/environmental-health-and- you/radiological-health	David Scalise - David.M.Scali se@dhhs.nh.go v - NH Department of Health and Human Services
New Jersey	Decontamination and Decommissioning (DandD) and RESRAD- Build		James McCullough - James.McCull ough@dep.nj.g ov - New Jersey Department of Environmental Protection
New Mexico			
New York	RESRAD-Build or PRG calculators		Cynthia A. Costello - cynthia.costell o@health.ny.g ov - NYS Department of Health
North Carolina			
North Dakota			
Ohio	RESRAD-Build		Shannon Dettmer - Shannon.Dett mer@odh.ohio .gov - Ohio Department of Health

State	Guidance/Model	Cleanup Specifics	Contact
Oklahoma			
Oregon	NRC		David Howe - David.m.howe @oha.oregon.g ov - Oregon Health Authority
Pennsylvania	RESRAD-Build		Bryan Werner - brwerner@pa. gov - PA Department of Environmental Protection
Rhode Island	FDA DILs	Specifically, about ingestion.	Alexander Hamm - alexander.ham m@health.ri.g ov - State of Rhode Island Department of Health
South Carolina	EPA Regional Screening Level Calculator	https://www.epa.gov/risk/regional-screening-levels-rsls-users-guide#resident	Ray Holberger - holberrr@dhec .sc.gov - South Carolina Department of Health and Environmental Control
South Dakota			

State	Guidance/Model	Cleanup Specifics	Contact
Tennessee	Tennessee State Regulations for Protection Against Radiation 0400-20-05161	The Tennessee Division of Radiological Health does not have guidance specific to dust. Our methodology for evaluating the risk from radioactively contaminated dust (particulates) that could be ingested/inhaled would be to utilize the calculational methods and tables found in Tennessee State Regulations for Protection Against Radiation 0400-20-05161. https://www.tn.gov/environment/programareas/rh-radiological-health1.html	Ryan Crifield - ryan.crihfield @tn.gov and Jerry Bingaman - Jerry.bingama n@tn.gov - Department of Environment and Conservation
Texas	10CFR20 and RESRAD-Build	Main Guidance for assessment of Doses for Radiological emergencies is EPA Protective Action Guides (PAGs), EPA-400/R-17/001. For consequence management the State Response team typically use the Program Turbo FRMAC which incorporates EPA PAGs.For "dust" Type radiological release we use HotSpot which is a Gaussian Plume model software specifically for radiological isotopes. For Power plants we use a site-specific Modeling software that is proprietary to South Texas Project (STP) and RASCAL, which is a software NRC developed which has two modeling systems. For a real nuclear/radiological event we would have access to Interagency Modeling and Atmospheric Assessment Center (IMAAC) which has a supercomputer at Lawrance Livermore National Lab (LLNL) that has live time inputs for weather and release data. Most of software that has been discussed is available or discussed at NRC RAMP website. For routine assessment like for release of a licensed site for unrestricted use, we typically use limits set by title 10 of the Federal code of regulations section 20	ruben.cortez@dshs.texas.gov - Texas Department of State Health Services

State	Guidance/Model	Cleanup Specifics	Contact
		(10CFR20). The State of Texas is an Agreement State, meaning that the State has an agreement with NRC to control radioactive materials in the state. Texas Radiation Control Regulations are in Title 25 Texas Administrative Cose (TAC) section 289. Release for unrestricted use is in 25TAC §289.202. We typically use modeling software like Visual Sample Plan (VSP) and RESRAD to determine the release levels meet the regulated doses	
Vermont	Responded, but no models or guidance in place		Sarah Owen - sarah.c.owen @vermont.go v - Vermont Department of Health
Virginia			
Washington			
West Virginia	No models or guidance specifically related to radiological dust contamination		

State	Guidance/Model	Cleanup Specifics	Contact
Wisconsin			
Wyoming	EPA Protective Action Guides (PAG)	Wyoming's Uranium Recovery Program does not have it's own guidance on these items. We do use any applicable Nuclear Regulatory Commission Guidance	Brandi O'Brandi - Brandi.OBrien @wyo.gov - Wyoming Department of Environmental Quality

Section 3: Indoor Chemically Contaminated Dust Regulation by State

Similarly, regulations and guidance in place for chemically contaminated dust also varies by state. Some states currently utilize federal guidance while others have developed their own or borrowed from other states. Relevant departments from all 50 states were contacted regarding what guidance and models they have in place. These departments were asked what models or guidance they would use for cleanup in a situation where there would be chemically contaminated dust indoors. There were several states that responded, but they did not have any models in place. Many departments used the EPA guidelines for assessing lead indoors and some states were able to point to guidelines they had for clandestine meth lab cleanup. Additionally, one state, Washington, provided Polychlorinated biphenyls (PCB) guidance documents.

Unfortunately, 31 states did not reply to our request. The findings listed below are not comprehensive and additional info has been added as a supplement to the department responses. States highlighted yellow did not provide a response while states that are highlighted blue responded but wither did not have anything specific in place or it was unclear if any guidance was in place.

NAAHQ list of meth lab cleanup guidelines by state: https://naahq.org/sites/default/files/naa-documents/government-affairs/protected/business-management-operations/property-operations/State-by-State-Meth-Lab-Cleanup-Regulations.pdf

US EPA Residential Sampling for Lead - Protocols for Dust and Soil Sampling - <u>20012quz.pdf</u> (epa.gov)

World Trade Center incident benchmarks –

https://epa-bprg.ornl.gov/documents/copc_benchmark.pdf.

Department of Defense's (DOD) Center for Health Promotion and Preventative Medicine (CHPPM) 2009 Technical Guide "Health Risk Assessment Methods and Screening Levels for Evaluating Office Worker Exposures to Contaminants on Indoor Surfaces Using Surface Wipe Data."

Table 2: Chemical Dust Models and Guidance by State

State	Guidance/Model	Cleanup Specifics	Contact
Alabama	N/A		
Alaska	N/A		
Arizona	N/A		
Arkansas	N/A		
California	Human and Ecological Risk Office (HERO), Human Health Risk Assessment (HHRA) for 2018 & 2020 Note Number 8 "Recommendations for Evaluating Polychlorinated Biphenyls (PCBs) at Contaminated Sites in California" https://dtsc.ca.gov/wp-content/uploads/sites/31/2 018/01/HERO-HHRA- Note-8-June-2020-A.pdf		N/A found during previous search by sponsor.

State	Guidance/Model	Cleanup Specifics	Contact
	Assessment (OEHHA)		
	Environmental Protection		
	Agency 2009 Guidance		
	"Assessment of		
	Children's Exposure to		
	Surface		
	Methamphetamine		
	Residues in Former		
	Clandestine		
	Methamphetamine Labs,		
	and Identification of a		
	Risk-Based Cleanup		
	Standard for Surface		
	Methamphetamine		
	Contamination"		
	https://oehha.ca.gov/medi		
	a/downloads/crnr/exposur		
	eanalysis022709.pdf		
Colorado	N/A		
Connecticut	N/A		
Delaware	N/A		
Florida	N/A		

State	Guidance/Model	Cleanup Specifics	Contact
Georgia	Combination of different	Before making any assessment of	Robert Kalch
	guidance documents	hazardous waste cleanup levels it must	_
		first be determined if a waste is a	robert.kalch2
		hazardous waste. For hazardous waste	@dnr.ga.gov
		determinations, the Haz Waste ID and	- Georgia
		Characteristics EPA guidance	Environment
		document lays out the basics for	al Protection
		making a hazardous waste	Division
		determination. The waste (in this case	
		a dust) may be determined to be a	
		hazardous waste due to either being a	
		listed hazardous waste (F, P, K, or U	
		categories) or a characteristic	
		hazardous waste (based on the	
		characteristics of ignitability,	
		corrosivity, reactivity, or toxicity). The	
		guidance document references 40 CFR	
		Part 261, Appendix I, for	
		representative sampling methods. For	
		obtaining a representative sample of a	
		dust, sampling in accordance with	
		ASTM Standard D2234-76 for fly-ash	
		like materials may be the most	
		appropriate method listed. However,	
		this must be confirmed because fly ash	
		may exist in many forms ranging from	
		dust-like to glass-like material. Once a	
		sample is collected, the following EPA	
		website (https://www.epa.gov/hw-	
		sw846) contains information on	
		which of the SW-846 test methods	
		should be used. Method 1311:	
		Toxicity Characteristic Leaching	
		Procedure (TCLP) is a commonly used	
		method to obtain an extract which is	
		further analyzed using an appropriate	
		test method such as 8260C for VOCs.	
		The sample would be considered a	
		hazardous waste and must be managed	

State	Guidance/Model	Cleanup Specifics	Contact
State	Guidance/Model	Cleanup Specifics and disposed of as a hazardous waste, if the concentration(s) are equal to, or greater than, current authorized regulatory limits. If all regulated constituents were less than the appropriate regulatory limits the dust would be handled as a solid waste instead.	Contact
Hawaii			
Idaho	N/A		

State	Guidance/Model	Cleanup Specifics	Contact
Illinois	N/A		
Indiana	N/A		
Iowa	N/A		
Kansas	Answered, but no specific models or guidance in place		
Kentucky	N/A		
Louisiana	N/A		
Maine	N/A		
Maryland	N/A		

State	Guidance/Model	Cleanup Specifics	Contact
Massachusett	Technical update on this	Massachusetts does not develop clean-	Greg Braun -
S	topic	up levels; however, we evaluate	greg.braun@
	(https://www.mass.gov/d	environmental exposures and risks to	mass.gov -
	oc/technical-update-	human health which we summarize in	Massachusett
	characterization-of-risks-	our public health assessment	s Dept of
	due-to-inhalation-of-	documents, through our cooperative	Env.
	particulates-by-	agreement with the US Agency for	Protection
	construction/download	Toxics Substance and Disease	
		Registry (ATSDR). When evaluating	
	This paper cited in that	exposure to contaminated dust in the	
	report may also be	work that we do, we would follow	
	helpful:	ATSDR's Public Health Assessment	
	https://www.mass.gov/do	Guidance Manual	
	<u>c/real-time-air-</u>	https://www.atsdr.cdc.gov/pha-	
	monitoring-at-	guidance/index.htmland, utilizing	
	construction-and-	ATSDR media specific screening	
	remediation-sites-to-	values and exposure dose guidance for	
	estimate-risks-of-	the specific pathway we are	
	<u>0/download</u>	evaluating, e.g.	
	Licensed Site	https://www.atsdr.cdc.gov/pha-	
	Professional Association	guidance/resources/ATSDR-EDG-	
	produced a newsletter	Soil-Sediment-Ingestion-508.pdf and	
	addressing some of the	https://www.atsdr.cdc.gov/pha-	
	issues relating to dust	guidance/resources/ATSDR-EDG-	
	exposures you may find	Inhalation-508.pdf.	
	interesting:		
	https://www.lspa.org/inde		
	x.php?option=com_dailyp		
	lanetblog&view=entry&c		
	ategory=blog&id=371:res		
	ources-for-evaluating-the-		
	dust-inhalation-pathway-		
	and-impacts-for-residents		
Michigan	Lead - Michigan	No guidance in place but would likely	
	_	be done using EPA guidance for lead in	
	Human Services	dust sampling.	
	(MDDHS) uses EPA		

State	Guidance/Model	Cleanup Specifics	Contact
	guidance and cleanup levels for lead in indoor dust		
Minnesota	Lead - methods for dealing with leaded dust are based on HUD guidelines: https://www.hud.gov/program_offices/healthy_homes/lbp/hudguidelines Minnesota Rules:https://www.health.state.mn.us/communities/environment/lead/rules/index.html	Specifically for lead (Pb), methods for dealing with leaded dust are based on HUD guidelines: https://www.hud.gov/program_offices/healthy_homes/lbp/hudguidelines Minnesota Rules:https://www.health.state.mn.us/communities/environment/lead/rules/index.html Minnesota Rules define lead dust here: https://www.revisor.mn.gov/rules/476 1.2510/ Removal of interior lead paint AND leaded dust: https://www.revisor.mn.gov/rules/476 1.2645/ Sampling for lead dust for clearance is here: https://www.revisor.mn.gov/rules/476 1.2670/	@state.mn.us
Mississippi	N/A		
Missouri	N/A		
Montana	No specific models or guidance. Meth lab -California and Colorado guidelines	Not aware of specific risk assessment activities that Montana DEQ has done for asbestos or methamphetamine cleanup. We generally follow EPA guidance regarding asbestos. Meth cleanup value is based on information from California and Colorado.	dkirkpatrick @mt.gov - Montana Department of Environment al Quality
Nebraska	Meth lab - Title 178 Chapter 24, Lead - Title 178 Chapter 23	https://dhhs.ne.gov/Pages/Title- 178.aspx	Doug.Gillesp ie@nebraska. gov and LeAnna.Norq

State	Guidance/Model	Cleanup Specifics	Contact
			uest@nebras ka.gov - Nebraska Department of Health and Human Services
	Answered, but no specific models or guidance in place		
New Hampshire	N/A		
New Jersey	Answered, but no specific models in place	CSRR currently does not have published guidance available for cleaning up chemical dust indoors, as our perimeter air monitoring guidance for sites undergoing remediation attempts to eliminate this from occurring in the first place. If such a situation were to occur, it would be handled on a site-specific basis and would likely include a joint effort between NJDEP and NJDOH.	Allan Motter - allan.motter @dep.nj.gov - New Jersey Department of Environment al Protection
New Mexico	N/A		
New York	Lead - Follows the U.S. Environmental Protection Agency protocols for sampling residential dust for case closure purposes.	Has not developed guidelines that are specific to contaminated indoor dust	btsa@health. ny.gov - Bureau of Toxic Substance Assessment
North Carolina	N/A		
North Dakota	N/A		

State	Guidance/Model	Cleanup Specifics	Contact
Ohio	EPA Regional Screening Levels	Does not directly evaluate the risk of exposure to contaminated indoor dust. However, when soil is contaminated due to a release to environmental media, it is assumed that indoor dust is partially comprised of contaminated soil. This assumption is inherently built into the assumptions used to evaluate exposure to contaminated soil (e.g., soil ingestion, inhalation of volatile and particulate emissions, and dermal contact). https://www.epa.gov/risk/regional-screening-levels-rsls-users-guide	Sarah Beal - sarah.beal@e pa.ohio.gov - Ohio Environment al Protection Agency
Oklahoma	N/A		
Oregon	N/A		
Pennsylvania	N/A		
Rhode Island	N/A		
South Carolina	Lead - TSCA	quantified using wipe samples, and	Ray Holberger - holberr@dhe c.sc.gov - South Carolina Department of Health and Environment al Control
South Dakota	Answered, but no specific models or guidance in place		
Tennessee	Meth lab - California guidance:	For both lead dust cleanups and clandestine meth lab cleanups literature values have been used for clearance values and wipes were the primary sampling method during	

State	Guidance/Model	Cleanup Specifics	Contact
	ment-reference-dose-rfd- methamphetamine-and- assessment-childrens	characterization and confirmation sometimes supplemented with an XRF for lead cleanups. No site-specific exposure modeling has been conducted in either type of cleanup that we have been involved with	
Texas	N/A		
Utah	Utilizes New Mexico guidance: https://www.env.nm.gov/ hazardous-waste/wp-content/uploads/sites/10/2 022/11/www.env.nm.gov/ hazardous-waste/wp-content/uploads/sites/10/2 022/11/www.env.nm.gov/ hazardous-waste/wp-content/uploads/sites/10/2 022/11/www.env.nm.gov/ hazardous-waste/wp-content/uploads/sites/10/2 022/11/www.env.nm.gov/ L I Nov 2022.pdf	Swipe samples and compare to surface swipe screening levels, based on the NMED guidace (Appendix E)	Paige Walton - pwalton@ut ah.gov - Utah Department of Environment al Quality
Vermont	Responded, but no models or guidance in place		Sarah Owen - sarah.c.owen @vermon.go v - Vermont Department of Health
Virginia	N/A	Doesn't model indoor dust exposures directly, we only consider it on a regular basis through the evaluation of contaminated site soils. RAGS soil evaluations and the lead models all consider indoor dust to a degree	Kyle Newman - Kyle.newma n@deq.virgir ia.gov - Virginia Dept. of Environment al Quality
Washington	Answered, but no specific models in place. Provided documents on PCBs	Three documents where PCB dust was evaluated via ingestion, dermal, and inhalation. The Dallas Avenue document contains a dust collection SOP in Appendix D.	Lenford O'Garro - lenford.o"ga rro@doh.wa. gov - WA Department

State	Guidance/Model	Cleanup Specifics	Contact
		Dallas Avenue Neighborhood PCB Seattle, King County May 16, 2006 (wa.gov) Rainier Commons, Seattle, PCBs Exposure, Health Consultation, 2013 (wa.gov) Letter Health Consultation, Alder Tower Polychlorinated Biphenyls (PCBs) Caulking, Seattle, 2011 (wa.gov)	of Health
West Virginia	N/A		
Wisconsin	N/A		
Wyoming	N/A		