

# **Elevated levels of radioactivity in surface sediments near a radioactive waste processing facility in Martins Ferry, Ohio**

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## **Abstract**

Ambient air quality and freshwater resources face increasing threats from extraction, processing, and waste disposal related to unconventional oil and gas development (UOGD). To address citizens' requests to determine potential human health effects posed by a radioactive waste processing facility, Austin Masters Services (AMS), located in the riverside town of Martins Ferry, Ohio, a science-based investigation was conducted to evaluate concentrations of Radium-226 (<sup>226</sup>Ra) and other radioisotopes in proximity to the site. Soil samples collected at various distances from the facility were submitted for radiological analysis, which revealed a gradient of <sup>226</sup>Ra that increases with increasing proximity to the facility entrance. Radiological activities for <sup>226</sup>Ra ranged from 3.76 pCi/g for the sample taken furthest away from the facility to 14.66 pCi/g for the sample taken closest to the main gate. Results for Lead-214 (<sup>214</sup>Pb) and Bismuth-214 (<sup>214</sup>Bi) showed similar trends, with activities that approach or exceed regulatory limits. Samples collected from a cemetery and community park located at least a mile from the facility revealed acceptable background levels for <sup>226</sup>Ra and other isotopes of concern.

Soil contamination at this site poses two potential threats for human and environmental health. First, soil and dust particles made airborne by car and truck traffic may contain <sup>226</sup>Ra that, if inhaled, could increase the risk for lymphoma, bone cancer, and leukemia. Second, downward migration of <sup>226</sup>Ra and other water-soluble pollutants may compromise the shallow, porous aquifer that underlies the site. Although subsurface contaminant migration within the water aquifer falls outside the scope of this project, scientific attention on this topic is warranted when considering evidence revealing contamination of surface sediments with moderately soluble <sup>226</sup>Ra at locations that fall within the 1-year and 5-year time of travel zones to the intake wells for Martins Ferry's municipal water treatment plant.

## **Background**

Martins Ferry is a riverside town in eastern Ohio with a long history of industrial pollution and associated human health issues, including asthma, heart disease, and premature death (US EPA, 2022). Wheeling-Pittsburgh Steel Corporation operated a steel galvanizing facility on North 1<sup>st</sup> Street in Martins Ferry from before the 1950's, until its acquisition by Esmark in 2007. The facility continued operation after being sold by Esmark to Russian-based Severstal in 2008, which in turn sold the property to RG Steel in 2011. The property was eventually sold to a local businessman during bankruptcy proceedings of RG Steel in 2012. Between the years of 2000 and 2012 alone, this galvanizing facility released an estimated 13,000,000 lbs of pollutants, including chromium, zinc, aluminum, lead, and hydrochloric acid into the environment (US EPA, 2015a).

Austin Master Services (AMS) is an oil and gas waste processing facility specializing in radiological waste and began operations at this site in 2014. AMS is permitted to receive 60,000 tons of mixed radioactive waste per year (AMS, 2022). The facility handles solid and liquid wastes from unconventional oil and gas

development (Simmers, 2014). The 60,000 tons per year figure does not include liquid waste, and it is unknown the volume of liquid waste the facility is permitted to receive. The US Environmental Protection Agency (US EPA) defines oil and gas waste as Technologically Enhanced Naturally Occurring Radioactive Material (TENORM). Because the extraction process concentrates the naturally occurring radionuclides and exposes them to the surface environment and human contact, these wastes are classified as such (US EPA, 2015c).

Residents raised concerns about potential negative health impacts from the facility after receiving inspection reports from the Ohio Department of Natural Resources (ODNR) through a public records request. Issues related to containment, overcapacity, and structural integrity are summarized in Table 1. The presence of fluids on the floor of the facility during nearly every inspection raises particular concern for environmental dissemination when considering significant boot and truck traffic entering and exiting the facility.

**Table 1.** Summary of operational issues identified during scheduled inspections of the AMS facility conducted by ODNR.

Date	Purpose	Issues	Containment Issues Cited	Bins Full	Water/Waste on Floor	Leaking Roof
12/14/2016	Facility inspection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7/5/2017	Facility inspection	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10/26/2017	Facility inspection	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11/9/2017	Facility inspection	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1/3/2018	Facility inspection	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2/22/2018	Facility inspection – View proposed expansion	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
8/23/2018	Facility Quarterly Inspection	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
9/7/2018	Follow-up Inspection	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
9/12/2018	Follow-up to 9/7/2018 inspection	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11/8/2018	4th quarter inspection 2018	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4/18/2019	2nd Quarter Site Inspection 2019	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
8/5/2019	3rd Quarter Site Inspection 2019	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
11/20/2019	4th Quarter Site Inspection 2019	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2/7/2020	1st Quarter Site Inspection 2020	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9/2/2020	3rd Quarter Site Inspection 2020	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
11/18/2020	4th Quarter Site Inspection 2020	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2/25/2021	1st Quarter Site Inspection 2021	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6/29/2021	2nd Quarter Site Inspection 2021	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

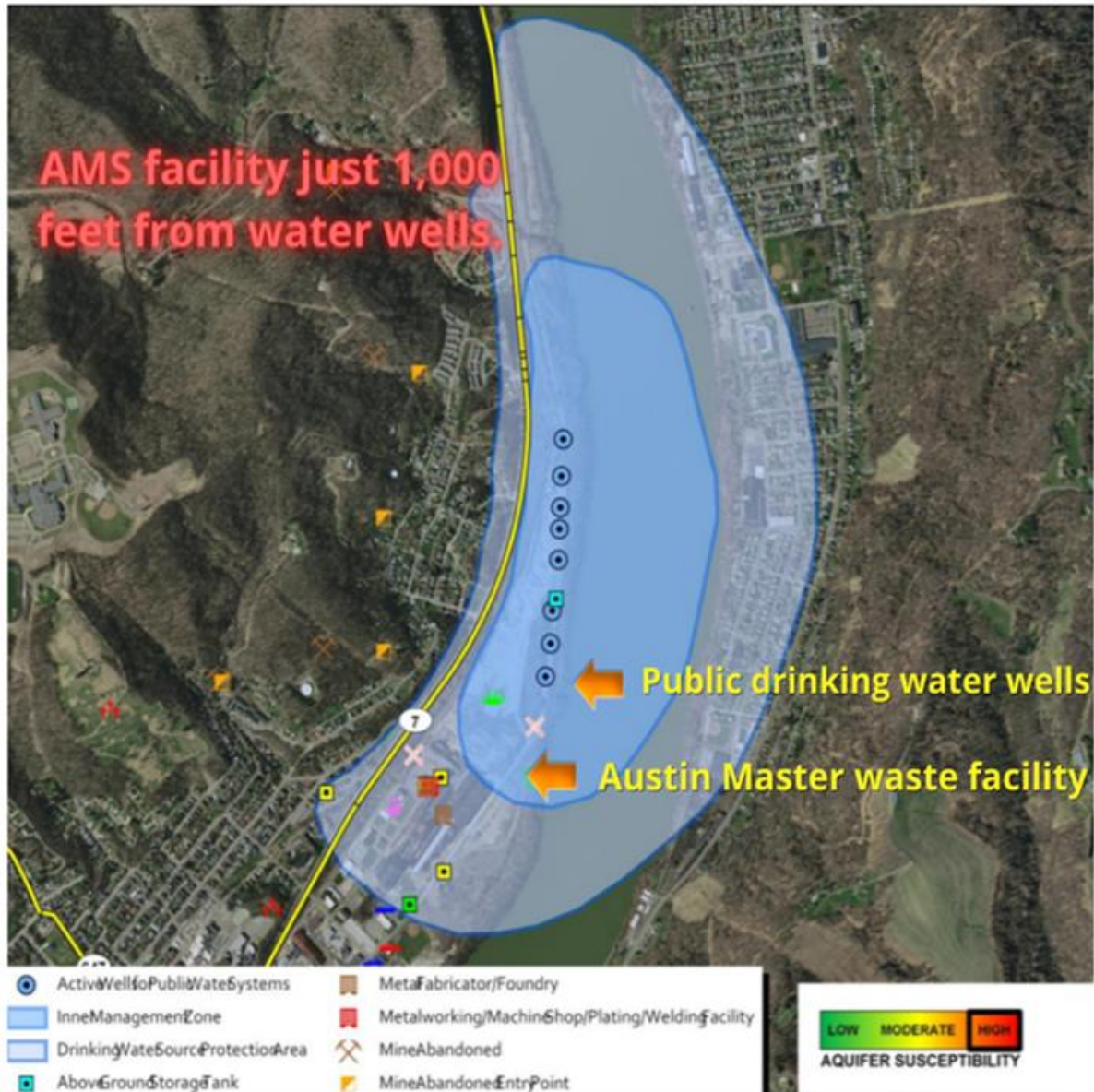
### ODNR Div of Oil and Gas Resource Management Inspection Report Issues

Neither the ODNR nor any other regulatory agency tests for chemical or radioactive pollutants outside the perimeters of the AMS facility. Hence, this report represents the first science-based investigation to address community concerns regarding potential threats to human and environmental health related to processing and transporting radioactive mixed wastes at this site.

Because inhalation of particulates containing  $^{226}\text{Ra}$  increases the risk of a variety of health disorders, including leukemia, bone cancer, and lymphoma, this project initially targeted potential contamination of roadways serving the area with heavy truck traffic that generates plumes of dust, including respirable  $\text{PM}_{2.5}$  particles. However,  $^{226}\text{Ra}$  and other pollutants in contaminated surface sediments could pose additional threats to groundwater resources, including the shallow aquifer that serves as source water for the local municipal water supply system. Figure 1 illustrates the close proximity of the AMS facility to the intake wells for the municipality.

Figure 1  
Drinking Water Source Protection Area for Martins Ferry Public Water Supply

## Martins Ferry, PWSID # OH0701212, Belmont County



**Figure 1.** Map of the drinking water source protection area for Martins Ferry, Ohio public drinking water supply (figure modified from OEPA, 2021). The drinking water pumping well locations are indicated by blue circles (labeled as “Active Wells for Public Water Systems” in the legend). The “Inner Management Zone” line (darker blue circle) corresponds to the boundary for a 1-year composite time of travel, and the “Drinking Water Source Protection Area” line (lighter blue circle) corresponds to the boundary for a 5-year composite time of travel. The AMS facility clearly falls within the Drinking Water Source Protection Area and is within 1,000 feet of the closest pumping well for the public water supply.



This project does not directly address issues related to subsurface contaminant migration, although such efforts are certainly warranted based upon results and information presented here.

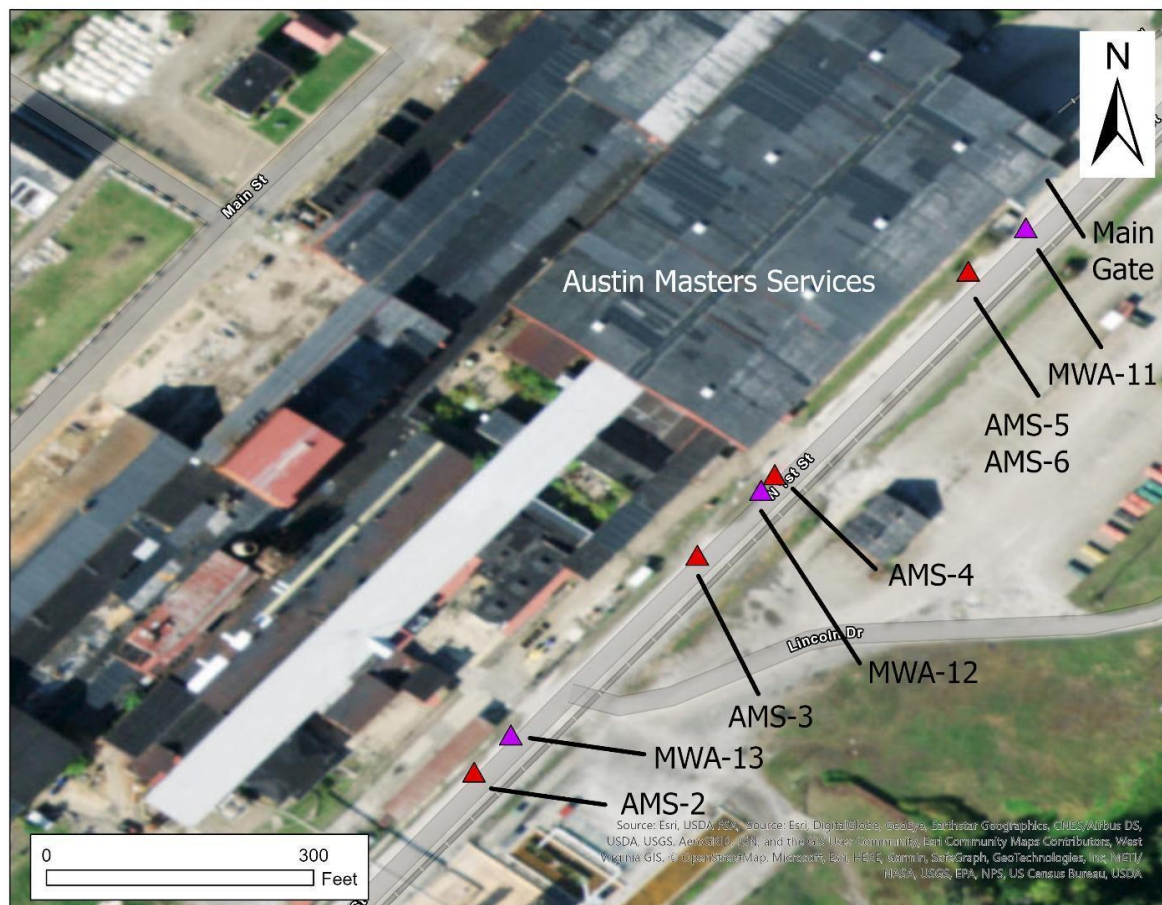
## Methods

### *Soil surveys*

Soil surveys for radioactivity were conducted using a Model 3000 Ludlum Digital Survey Meter. Surveys were taken along a linear transect (stretch of road/public sidewalk) paralleling North 1<sup>st</sup> Street leading to the entrance of the AMS radioactive waste processing facility in Martins Ferry, Ohio. Results obtained along this transect were compared with background radioactivity measurements taken at a community park and a cemetery located up to 1 mile away from the facility. Areas where survey values from the Ludlum Meter were more than twice that expressed from background measurements were selected for surface sediment sample collection.

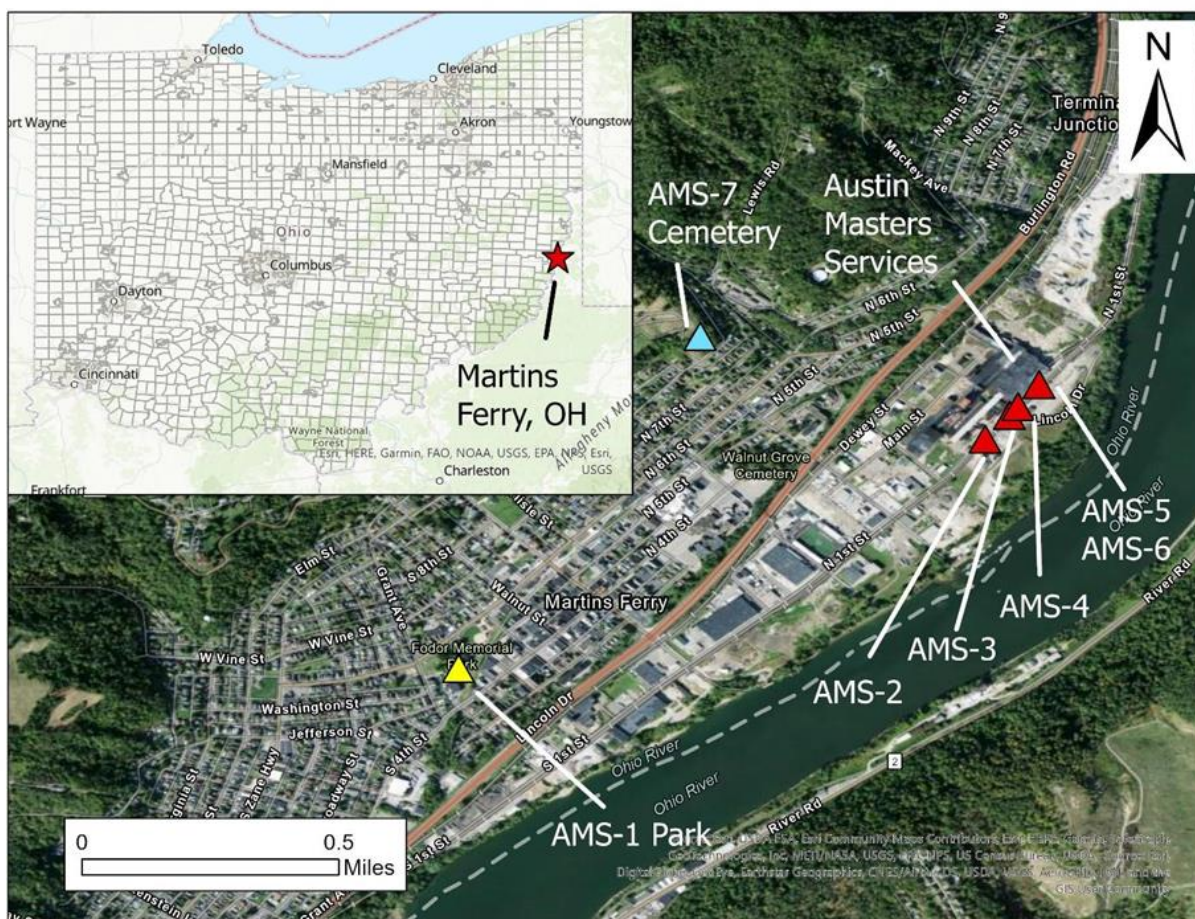
### *Surface sediment sample collection*

Figure 2 illustrates the location of samples collected during two visits to the site. Samples were first collected on November 9<sup>th</sup>, 2021 and labeled MWA in honor of guidance and assistance provided from members of the nonprofit environmental advocacy group Mountain Watershed Association. Approximately 10 grams of soil was collected directly into sealable plastic storage bags.



**Figure 2.** Location of samples collected during two sampling expeditions. Note that samples MWA-11, AMS-5, and AMS-6, were taken closest to the building's Main Gate.

A second set of samples was collected on February 16<sup>th</sup>, 2022, along the same transect used previously (Figure 2). Samples labeled AMS-2 through AMS-6 were collected in response to elevated radioactivity detected during soil surveys using the Ludlum Digital Survey Meter. Figure 3 shows the location of the second set of samples, including background samples AMS-1 and AMS-7 that were taken from a community park and cemetery, respectively.



**Figure 3.** Location map of the Austin Masters Services facility in Martins Ferry, Ohio and of collected surface sediment samples during the second sampling trip (red triangles) on 02/16/2022. Samples include surface sediment at a local park (yellow triangle) and a local cemetery (light blue triangle).

Approximately 100 grams of surface sediments were collected from each sample location using sterile plastic scoops and then transferred to sterile, plastic sample containers. Samples were secured with plastic lids and tamper-proof parafilm tape.

Table 2 provides dates and GPS coordinates for surface sediment samples collected near the AMS facility.

**Table 2.** Coordinates and sampling dates of surface sediment samples collected around the Austin Master Services facility, as well as two reference samples collected at a community park and cemetery located in Martins Ferry.

Sample name	Date collected	Latitude	Longitude
MWA-11	11-09-2021	40.102611	-80.711000
MWA-12	11-09-2021	40.101806	-80.711814
MWA-13	11-09-2021	40.101056	-80.712583
AMS-1 Park	02-16-2022	40.094484	-80.727518
AMS-2	02-16-2022	40.100942	-80.712696
AMS-3	02-16-2022	40.101607	-80.712010
AMS-4	02-16-2022	40.101854	-80.711772
AMS-5	02-16-2022	40.102478	-80.711177
AMS-6	02-16-2022	40.102478	-80.711177
AMS-7 Cemetery	02-16-2022	40.103834	-80.720717

### Gamma spectroscopy

The MWA samples from the first round of surface sediment sample collection were shipped to Boston Chemical Data Corporation in Natick, MA for initial gamma spectroscopic screening. Three of the samples (MWA 11, MWA 12, MWA 13) showed high total activity and were subsequently sent to Eberline Analytical/Oak Ridge Laboratory (Eberline Lab) in Oak Ridge, TN for additional radiological analysis. Due to low sample mass, the three samples were combined, blended, and then divided in half to allow for a duplicate measurement. All surface sediment samples from the second round (AMS-1 through AMS-7) were sent to Eberline Lab directly. Gamma spectroscopy at Eberline Lab was conducted using EPA Method 901.1 Modified (US EPA, 2019).

### Results

Table 3 summarizes activity concentrations for  $^{226}\text{Ra}$  concentrations in soil samples collected during two sampling expeditions. An average background level of  $1.34 \pm 0.33$  picocuries per gram (pCi/g) for  $^{226}\text{Ra}$  was established using data for samples ASM-1 Park and ASM-7 Cemetery. In comparison, activity concentrations for  $^{226}\text{Ra}$  from samples collected along the transect near the AMS facility are significantly higher than background concentrations and range from  $3.76 \pm 0.34$  pCi/g (for the sample furthest away from the AMS Main Gate) to  $14.66 \pm 0.95$  pCi/g (for the sample closest to the AMS Main Gate) (Table 3).

**Table 3.** Gamma spectroscopy results for  $^{226}\text{Ra}$  for surface sediment samples collected around the Austin Master Services facility, a local park, and a local cemetery.

Sample name	Activity concentration (pCi/g) $^{226}\text{Ra}$	Counting uncertainty (pCi/g)
Combined MWA 11/12/13 <sup>a</sup>	14.07	1.59
AMS-1 Park <sup>b</sup>	1.07	0.19
AMS-2	3.76	0.34
AMS-3	7.64	0.69
AMS-4	13.12	1.05
AMS-5	14.66	0.95
AMS-6	14.14	1.09
AMS-7 Cemetery	1.60	0.46

<sup>a</sup> The "Combined MWA 11/12/13" sample was analyzed twice, the table shows the average of those two measurements.

<sup>b</sup> The "AMS-1 Park" sample was analyzed twice, the table shows the average of those two measurements.



Activity concentrations for  $^{214}\text{Pb}$  and  $^{214}\text{Bi}$  are presented in Tables 4 and 5, respectively, and share similar profiles with  $^{226}\text{Ra}$  in samples collected at the site.

**Table 4.** Gamma spectroscopy results for  $^{214}\text{Pb}$  for surface sediment samples collected around the Austin Master Services facility, a local park, and a local cemetery.

Sample name	Activity concentration (pCi/g) $^{214}\text{Pb}$	Counting uncertainty (pCi/g)
Combined MWA 11/12/13 <sup>a</sup>	14.89	1.62
AMS-1 Park <sup>b</sup>	1.20	0.18
AMS-2	3.79	0.34
AMS-3	9.03	0.87
AMS-4	13.02	1.04
AMS-5	14.98	1.02
AMS-6	14.89	1.32
AMS-7 Cemetery	1.42	0.38

<sup>a</sup> The “Combined MWA 11/12/13” sample was analyzed twice, the table shows the average of those two measurements.

<sup>b</sup> The “AMS-1 Park” sample was analyzed twice, the table shows the average of those two measurements.

**Table 5.** Gamma spectroscopy results for  $^{214}\text{Bi}$  for surface sediment samples collected around the Austin Master Services facility, a local park, and a local cemetery.

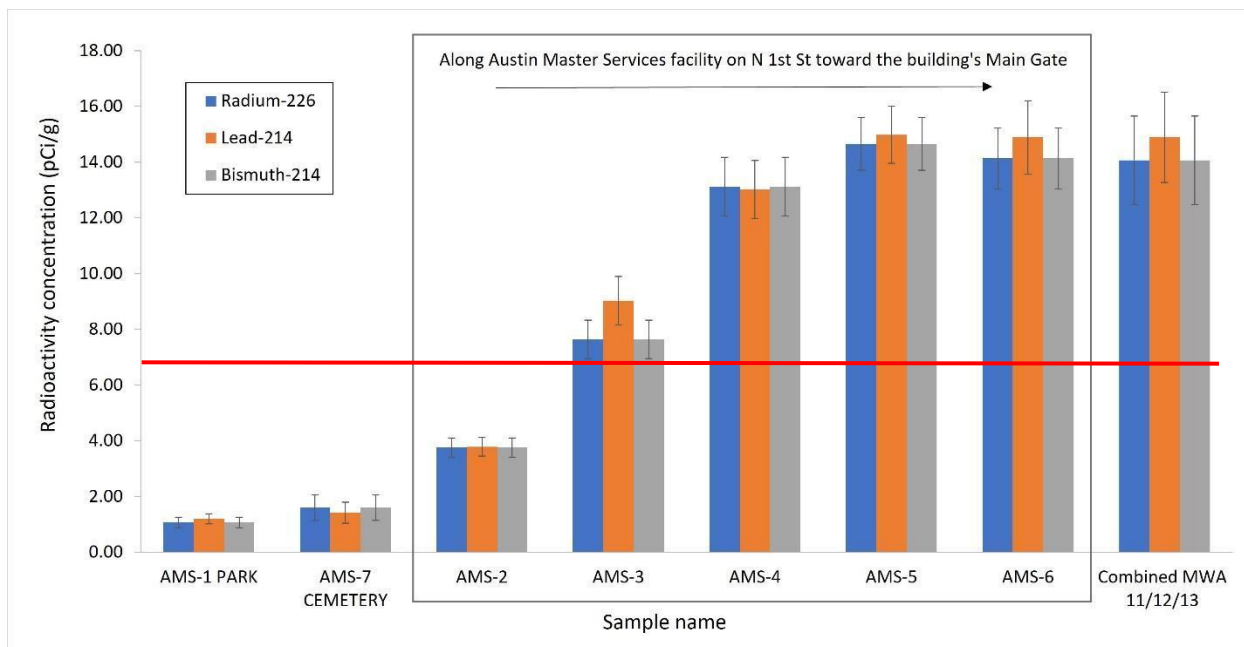
Sample name	Activity concentration (pCi/g) $^{214}\text{Bi}$	Counting uncertainty (pCi/g)
Combined MWA 11/12/13 <sup>a</sup>	14.07	1.59
AMS-1 Park <sup>b</sup>	1.07	0.19
AMS-2	3.76	0.34
AMS-3	7.64	0.69
AMS-4	13.12	1.05
AMS-5	14.66	0.95
AMS-6	14.14	1.09
AMS-7 Cemetery	1.60	0.46

<sup>a</sup> The “Combined MWA 11/12/13” sample was analyzed twice, the table shows the average of those two measurements.

<sup>b</sup> The “AMS-1 Park” sample was analyzed twice, the table shows the average of those two measurements.

## Discussion

The US EPA requires activity concentrations of  $^{226}\text{Ra}$  in surface soils and sediments to not exceed local background concentration by more than 5 pCi/g (Luftig and Weinstock, 1997). The local cemetery and local park surface sediment samples yielded an average background activity concentration of  $1.34 \pm 0.33$  pCi/g. Hence, local soils should be no more than 6.34 pCi/g. Figure 4 clearly shows that *surface sediments outside of the AMS facility are well above the limit recommended by the US EPA*. Results also demonstrate that activity concentrations for  $^{226}\text{Ra}$ ,  $^{214}\text{Pb}$ , and  $^{214}\text{Bi}$  increase with proximity to the facility entrance, implicating AMS as the source for local contamination.

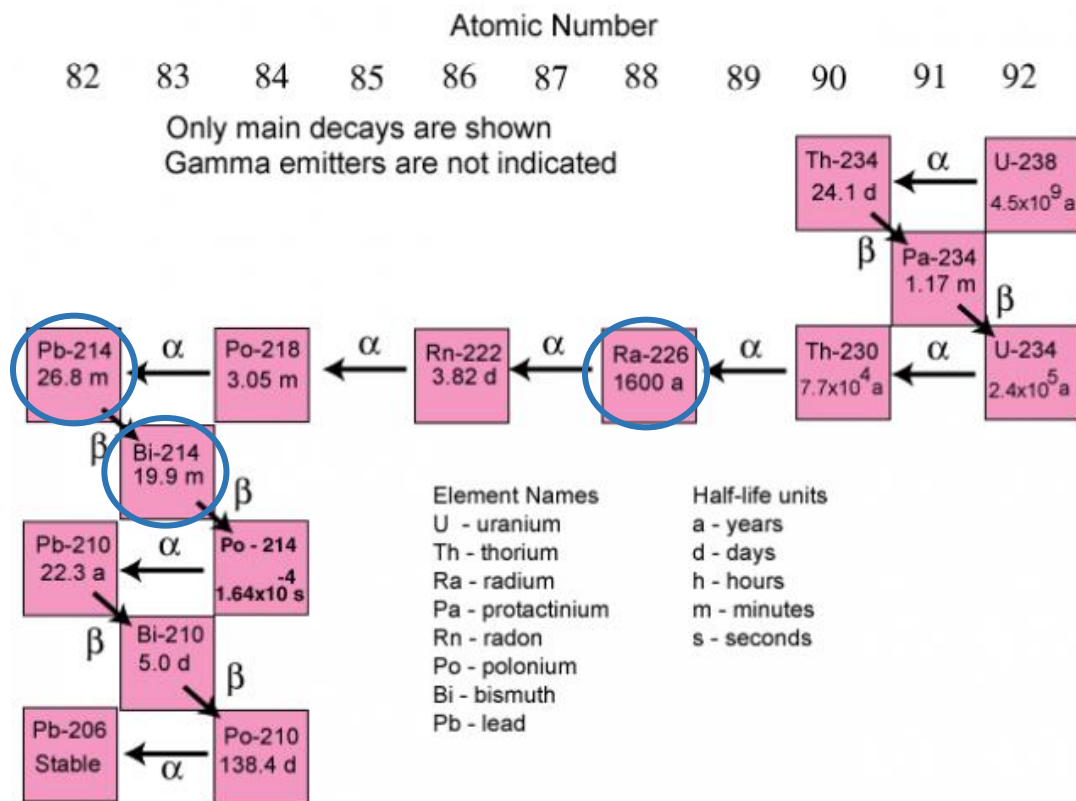


**Figure 4.** Activity concentrations for Radium-226 (blue), Lead-214 (orange), and Bismuth-214 (gray) for surface sediment samples collected around the Austin Masters Services facility (MWA and AMS-2 through AMS-7), a local park (AMS-1), and a local cemetery (AMS-7). The red line represents the US EPA's requirement that soils be no more than 5 pCi/g above background levels (Luftig and Weinstock, 1997), in this case the background levels are indicated by the cemetery and park samples. The counting uncertainty for gamma spectroscopy is shown as a vertical black error bar for each of the samples.

Radioisotopes  $^{226}\text{Ra}$ ,  $^{214}\text{Pb}$ , and  $^{214}\text{Bi}$ , which are identified at high concentration in the surface sediment samples collected near the AMS facility, are part of the Uranium-238 decay chain (Figure 5). This decay series and its radioisotopes are commonly associated with oil and gas waste (AL Nabhani et al., 2016).

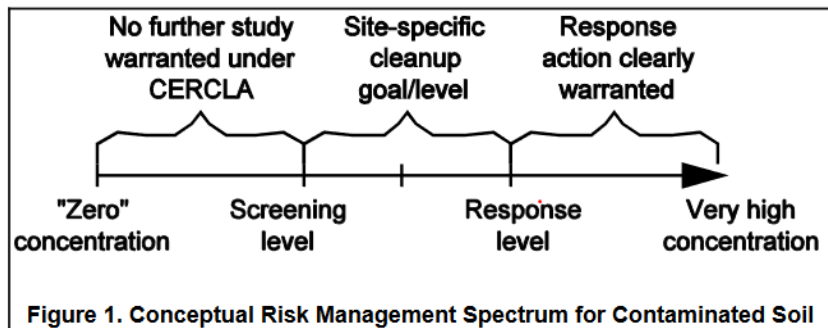


## The Uranium-238 Decay Chain



**Figure 5.** Uranium-238 decay chain. The three radioisotopes identified in the surface sediment samples near the Auston Masters facility, Radium-226 (Ra-226), Lead-214 (Pb-214), and Bismuth-214 (Bi-214), are circled in blue (figure modified from US EPA, 2015b).

The US EPA developed guidance for soil screening levels to “facilitate prompt identification of radionuclides and exposure areas of concern” (US EPA, 2000). According to this guidance, the screening level is used to determine response actions for cleanup (Figure 6).



**Figure 6.** US EPA soil screening level guidance for contaminated soil (US EPA, 2000).

The generic soil screening level for external radiation exposure for  $^{226}\text{Ra}$  and its decay products is 0.0915 pCi/g (Table 6). The gamma spectroscopy results for the AMS surface sediment samples are clearly orders of magnitude above the soil screening levels for  $^{226}\text{Ra}$  and its decay products.

**Table 6.** US EPA generic soil screening level (SSL) in pCi/g for  $^{226}\text{Ra}$ . The first row represents the SSL for  $^{226}\text{Ra}$  on its own, and “decay-corrected” accounts for the decay products (including  $^{214}\text{Pb}$  and  $^{214}\text{Bi}$ ) of  $^{226}\text{Ra}$  (US EPA, 2000).

Type	Ingestion of homegrown produce	Direct ingestion of soil	Inhalation of fugitive dust	External radiation exposure
Not accounting for decay	0.0683	1.09	1,570	0.0131
Decay-corrected	0.0915	1.29	12,900	0.0915

### **Potential groundwater contamination**

Assessing migration of  $^{226}\text{Ra}$  and other radioactive or chemical contaminants in groundwater fell outside the scope of this project. However, the potential for downward migration of surface contaminants into the shallow, unconfined aquifer that serves as source water for the Martins Ferry water treatment plant is recognized by the US EPA.

A drinking water source assessment published by the Ohio EPA (OEPA, 2021) delineates the source water protection zones shown in Figure 1 and provides the following description:

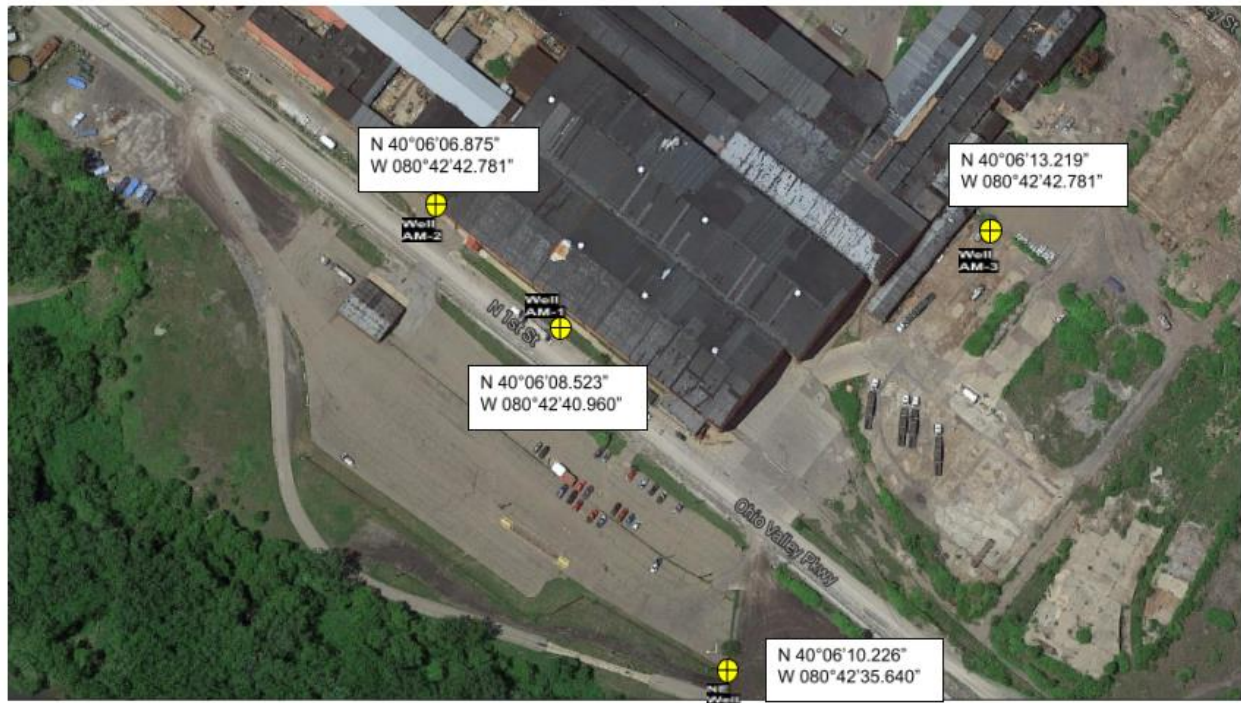
Martins Ferry Public Water Supply is a community public water system serving more than 10,900 people. Martins Ferry Public Water Supply now operates 8 wells that pump approximately 2,400,000 gallons of water per day from a sand and gravel aquifer (water-rich zone) within the Ohio River Valley aquifer system. The aquifer is covered by approximately 18 feet of highly-permeability material, which provides minimal protection from contamination. Depth to water in this aquifer is approximately 30 to 35 feet below the ground surface. Soils in the area are silty loams which are moderately well-drained, meaning that much of the rainfall and snowmelt will infiltrate into the soil, instead of running off or ponding. The topography is generally flat with very little relief. Ground water in this area is replenished by the gradual flow of water underground from higher to lower elevations and by approximately 9 inches per year of precipitation that infiltrates through the soil. (OEPA, 2021).

Furthermore, information obtained from a Semi-Annual Groundwater Monitoring Program conducted by AMS warrants some attention and comment. Figure 7 shows the location of four groundwater monitoring wells installed by AMS in 2015. The well labeled “NE well” at the bottom of the figure lies between the facility and the intake wells for the Martins Ferry water treatment plant and *within the Inner Management Zone that corresponds with a 1-year time of transport to the municipal water wells.*



Austin Master Services

## Well Water Sample Locations



**Figure 7.** Location of groundwater monitoring wells installed by AMS in 2015. Image courtesy of AMS.

Tabulated results from radiological and chemical analyses were provided by AMS for each of the four wells from 2015 to 2021. Table 7 presents information from the Northeast monitoring well (NE) located between the waste processing facility and the intake wells for Martins Ferry's municipal water treatment plant. Activity levels for gross alpha emissions typically exceeded health-based screening levels and raised concern for the quality of this source water. However, based upon large confidence intervals reported for gross alpha activity for the most recent sample and the lack of confidence intervals for results from previous years, it is difficult to trust results as they are presented. Results are also missing completely from 2020 and most of the results are missing from 12/2019.

Additional information regarding sample collection and handling protocols, instrument operational parameters, complete laboratory datasets, and well log reports are needed to properly assess subsurface contaminant migration from this site.

**Table 7.** Summary of groundwater analytical results from the Northeast monitoring well (NE). Screenshots taken from the semi-annual groundwater monitoring program by AMS. Values highlighted in yellow exceed health-based screening levels. Green highlights indicate exceedance of aesthetics-based standard maximum contaminant level (SMCL) and red indicates exceedance of both health-based and aesthetic-based screening levels.

Sample ID: Date: Sampler: Laboratory:	NE Well										Groundwater Standards	
	8/27/2015	3/30/2016	9/16/2016	5/17/2017	9/21/2017	4/14/2018	10/24/2018	5/8/2019	12/20/2019	9/17/2021		
										CEC	MCL <sup>1</sup>	SMCL <sup>2</sup>
Parameters												
<b>TCL VOCs (mg/l)</b>												
cis-1,2-Dichloroethene	< 0.001	ND	ND	ND	ND	ND	ND	ND	ND	<0.001	0.07	nse
1,1, Dichloroethane	< 0.001	ND	ND	ND	ND	ND	ND	ND	ND	<0.001	nse	
Toluene	< 0.001	ND	ND	ND	ND	ND	ND	ND	ND	<0.001	1	
Trichloroethene	< 0.001	ND	ND	ND	ND	ND	ND	ND	ND	<0.001	0.005	nse
Vinyl chloride	< 0.001	ND	ND	ND	ND	ND	ND	ND	ND	<0.001	0.002	
<b>Metals (mg/L)</b>												
Arsenic (Total)	0.019	ND	0.019	0.028	0.023	ND	0.022	ND	--	<0.020	0.01	nse
Arsenic (Dissolved)	--	--	--	--	--	--	--	--	--	<0.020	0.01	nse
Barium (Total)	0.21	0.026	0.23	0.36	0.49	0.017	0.36	0.0996	--	0.0126	2	nse
Barium (Dissolved)	--	--	--	--	--	--	--	--	--	0.0078	2	nse
Boron (Total)	--	--	--	--	--	--	--	--	--	0.42	6 <sup>3</sup>	nse
Boron (Dissolved)	--	--	--	--	--	--	--	--	--	0.434	6 <sup>3</sup>	nse
Cadmium (Total)	0.065	0.08	0.047	0.063	0.041	0.073	0.053	0.0432	--	0.0287	0.005	nse
Cadmium (Dissolved)	--	--	--	--	--	--	--	--	--	0.0305	0.005	nse
Calcium (Total)	--	--	--	--	--	--	--	--	--	241	nse	nse
Calcium (Dissolved)	--	--	--	--	--	--	--	--	--	250	nse	nse
Chromium (Total)	0.048	0.028	0.067	0.081	0.09	0.022	0.054	0.0282	--	0.018	0.1	nse
Chromium (Dissolved)	--	--	--	--	--	--	--	--	--	0.0165	0.1	nse
Iron (Total)	--	--	--	--	--	--	--	--	--	6.72	nse	0.3
Iron (Dissolved)	--	--	--	--	--	--	--	--	--	2.45	nse	0.3
Lead (Total)	0.099	0.0044	0.097	0.094	0.13	ND	0.082	0.0115	--	<0.010	0.005	nse
Lead (Dissolved)	--	--	--	--	--	--	--	--	--	<0.010	0.005	nse
Lithium (Total)	--	--	--	--	--	--	--	--	--	PENDING	0.083 <sup>3</sup>	nse
Lithium (Dissolved)	--	--	--	--	--	--	--	--	--	0.247	0.083 <sup>3</sup>	nse
Magnesium (Total)	--	--	--	--	--	--	--	--	--	23.0	nse	nse
Magnesium (Dissolved)	--	--	--	--	--	--	--	--	--	23.6	nse	nse
Manganese (Total)	2.5	2.7	2.5	2.8	2	2.5	1.6	1.53	--	1.47	nse	0.05
Manganese (Dissolved)	--	--	--	--	--	--	--	--	--	1.49	nse	0.05
Mercury (Total)	0.00026	ND	ND	ND	ND	ND	ND	ND	--	<0.00020	0.002	nse
Mercury (Dissolved)	--	--	--	--	--	--	--	--	--	<0.00020	0.002	nse
Potassium (Total)	--	--	--	--	--	--	--	--	--	4.82	nse	nse
Potassium (Dissolved)	--	--	--	--	--	--	--	--	--	4.83	nse	nse
Selenium (Total)	0.01	ND	ND	ND	ND	ND	ND	ND	--	<0.020	0.05	nse
Selenium (Dissolved)	--	--	--	--	--	--	--	--	--	<0.020	0.05	nse
Sodium (Total)	--	--	--	--	--	--	--	--	--	54.2	nse	nse
Sodium (Dissolved)	--	--	--	--	--	--	--	--	--	54.3	nse	nse
Silver (Total)	0.01	ND	ND	ND	ND	ND	ND	ND	--	<0.005	nse	0.1
Silver (Dissolved)	--	--	--	--	--	--	--	--	--	0.0052	nse	0.1
Strontium (Total)	--	--	--	--	--	--	--	--	--	0.794	4 <sup>3</sup>	nse
Strontium (Dissolved)	--	--	--	--	--	--	--	--	--	0.790	4 <sup>3</sup>	nse
Zinc (Total)	3	2	3	2.5	2.6	2.1	1.5	1.52	--	2.26	nse	5
Zinc (Dissolved)	--	--	--	--	--	--	--	--	--	2.38	nse	5



**Table 7 (Continued).** Summary of groundwater analytical results from the Northeast monitoring well (NE). Screenshot taken from the semi-annual groundwater monitoring program by AMS. Values highlighted in yellow exceed health-based screening levels. Green highlights indicate exceedance of aesthetics-based standard maximum contaminant level (SMCL) and red indicates exceedance of both health-based and aesthetic-based screening levels.

General Chemistry (mg/l unless otherwise noted)												
pH (Standard Units)	--	--	--	--	--	--	--	--	--	2.8	H3.H6	nse
Alkalinity	--	--	--	--	--	--	--	--	--	--	--	nse
Chloride	Not done	54.9	67.1	70.2	57.9	44	53.6	50.2	--	52.2	--	nse
Sulfate	Not Done	1620	1040	1530	1380	1300	1220	1220	--	1100	--	nse
Hardness	--	--	--	--	--	--	--	--	--	696	--	nse
Total Dissolved Solids	--	--	--	--	--	--	--	--	--	--	--	nse
Total Suspended Solids	--	--	--	--	--	--	--	--	--	--	--	nse
Specific Conductance (µS/cm)	--	--	--	--	--	--	--	--	--	2450	1c	nse
Field Readings												
Temperature °C	15.5	--	--	--	--	--	--	--	--	14.85	--	nse
pH (Standard Units)	2.68	--	--	--	--	--	--	--	--	2.79	--	nse
Specific Conductance (µS/cm)	3000	--	--	--	--	--	--	--	--	2187	--	nse
Total Dissolved Solids (mg/l)	--	--	--	--	--	--	--	--	--	1	--	nse
Oxidation Reduction Potential (mV)	--	--	--	--	--	--	--	--	--	494	--	nse
Dissolved Oxygen (mg/l)	--	--	--	--	--	--	--	--	--	1.85	--	nse
Turbidity (NTU)	394	--	--	--	--	--	--	--	--	56.5-1000/56.5	--	nse
Radiological (pCi/l unless otherwise noted)												
Gross Alpha	28	23.9	13.7	169	104	11.6	55.6	10.8	--	11.5±5.53	15	nse
Gross Beta	37.4	9.88	48.6	143	98	23	47	4.46	--	3.01±2.54	4 mrem/yr dose	nse
Radium-226	0.13	0.386	0.712	0.226	0.39	0.33	0.358	0.519	--	-0.281±0.419	5 <sup>4</sup>	nse
Radium-228	0.65	1.7	1.26	0.878	1.18	0.75	1.24	1.44	--	0.286±0.380	5 <sup>4</sup>	nse

**Notes:**

1. Primary Drinking Water Standard Maximum Contaminant Level (MCL) established under the Safe Drinking Water Act unless otherwise noted.
  2. Secondary Maximum Contaminant Level (SMCL) are non-enforceable non-health related guidelines regarding contaminants that may cause aesthetic effects (such as taste, odor, color or scaling) in drinking water. EPA recommends SMCL to water systems, but does not require systems to comply.
  3. Risk-based screening level from USEPA Regional Screening Levels last updated November 2020.
  4. Based on combined Radium 226 and 228.
- Denotes parameter not analyzed.  
 Bolded values were detected at concentrations above the Laboratory Reporting Limit.  
 "nse" Denotes no standard has been established.  
 "na" Not applicable

## Conclusion and Next Steps

This community-driven sampling project represents major cause for concern. Initial analytical results demonstrate that *surface sediments outside of the AMS facility are contaminated with radionuclides associated with oil and gas waste at levels that are well above limits established by the US EPA*. Surface contamination at this location constitutes an immediate health threat to those that inhale sediment particles made airborne by truck traffic. Surface contamination also poses a *potential* threat to the unconfined aquifer that serves as source water for the local municipality.

Local regulatory agencies (e.g., OEPA, ODNR, and ODH) need to conduct a thorough sampling of the AMS facility's surrounding areas as well as sample the ground, air filters, and other surfaces within the facility to ensure the public health safety of the facility's workers and of local residents. The Ohio Department of Natural Resources created new rules that govern oil and gas waste facilities in 2021 and they became law in 2022. The new rules do not address facilities that predate the rules. The new rules prohibit waste facilities from existing within 1,000 feet of a drinking water source and do not address any precautions to be taken when facilities such as this exist atop the aquifer. Ohio Department of Health (ODH) and ODNR should write stricter permits for facilities that handle radioactivity, which include strict protocols and standards for preventing the waste from exiting the building, and fines and sanctions for when the material does leave the facility. The state of Ohio should have a more coordinated way of regulating these types of facilities, rather than the disjointed, fractionated way they currently operate.

The site has already been deemed a "waste in place" closure by the Ohio EPA due to contamination from hexavalent chromium and other contaminants left over from the steel processing facility that predated the oil and gas waste facility. The site was never formerly closed according to OEPA documents and violations are outstanding. The site owner, 4K Industrial has been notified by the OEPA (Galanti, 2018). The legacy contamination, as well as the current known contamination at the surface and what is indicated by AMS's monitoring wells on site, are cause for US EPA's immediate involvement. The site needs a Preliminary Assessment and Visual Site Inspection, which includes all parts of the facility, including the current AMS operations. The US EPA needs to determine if this site could be classified as a Superfund Site, in order to protect the future of the drinking water source.

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