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National Guard Bureau
Mid-West Regional Industrial Hygiene Office
301-IH Old Bay Lane
Havre de Grace, MD 21078

ARNG-CSG-P October 7, 2014

MEMORANDUM FOR: The Adjutant General for South Dakota

SUBJECT: Surface Wipe Testing for Lead at the Mitchell Armory in Mitchell, South Dakota

National Guard Bureau (NGB) Mid-West Regional Industrial Hygiene (IH) Office field personnel conducted a survey on June 26, 2014 at the South Dakota Army National Guard Armory, located in Mitchell, South Dakota. This survey included a walkthrough of the facility and surface wipe sampling for lead contamination.

Occupational health risk assessment codes (RACs) are assigned to quantify health risks to personnel IAW DOD Letter of Instruction 6055.1, *DOD Safety and Occupational Health Program*. Risk assessment is an expression of health hazard severity and mishap probability, described in terms of route of exposure, actual exposure, exposure limit standards, potential health effects, duration of exposure, and number of exposed personnel. Guidance for RAC determination is attached to this memorandum.

Surface Wipe Sampling: Six wipe samples were collected on representative surfaces in the facility and analyzed for lead. For purposes of this report, any results that exceed the guidelines adopted by the NGB Mid-West Regional IH Office are considered significant.

Four of the six wipe samples had detectable levels of lead. The sample collected on a soda machine in the Drill room had a lead level of 166 ug/ft2. A sample collected on an electrical box in the Drill room had a lead level of 465 ug/ft2. A sample collected on the ice machine in the Kitchen had a lead level of 42 ug/ft2. Also of concern, a wipe sample from the supply air vent in the Rehearsal Hall had a lead level of 110 ug/ft2.

Recommendations

- Clean the upper level surfaces in the drill room and kitchen using high-efficiency particulate air (HEPA) filter vacuums or wet methods to avoid the spread lead dust to the floor below. (RAC 2)

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The NGB conducted this survey in the interest of preventing employee illness and to meet legal obligations where applicable. Results and recommendations are based on information provided by site personnel, field measurements, and conditions observed during the survey. For any further questions, please contact Non-Responsive .

Non-Responsive

Non-Responsive

Regional Industrial Hygienist

Appendix	Title	Status
A.	Lead	Attached

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FOIA Requested Record #J-15-0085 (SD)
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Appendix A
Lead

Surface Wipe Sampling

Six wipe samples were collected from representative areas of the facility using Environmental Express Ghost™ Wipes and templates IAW the OSHA wipe sampling method (OSHA Technical Manual, Appendix II, 2-1). The samples were analyzed for lead by OSHA Method ID-121. The results and photos are contained in Table A-1.

Although OSHA does not have published exposure standards for metal surface contamination, 29 CFR 1910 requires that all surfaces must be kept as free as practicable of accumulations of toxic metal dusts. In addition, DOD has instituted a policy to minimize surface contamination levels of heavy metals (*Control and Management of Surface Accumulations from Lead, Hexavalent Chromium, and Cadmium Operations*, DTM 12-003, 18 April 2012).

The NGB Mid-West Regional IH Office has adopted the guidelines for metal dust published in NG Pam 420-15, *Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges* and the Department of Energy (DOE)/Brookhaven National Laboratory *Surface Wipe Sampling Procedure* (IH75190). Any results that exceed these guidelines shown in Table A-1 are considered significant.

Four of the six wipe samples had detectable levels of lead. The sample collected on a soda machine in the Drill room had a lead level of 166 ug/ft2. A sample collected on an electrical box in the Drill room had a lead level of 465 ug/ft2. A sample collected on the ice machine in the Kitchen had a lead level of 42 ug/ft2. Also of concern, a wipe sample on the supply air vent in the Rehearsal Hall had a lead level of 110 ug/ft2.

Recommendations

1. Clean the upper level surfaces in the drill room and kitchen using high-efficiency particulate air (HEPA) filter vacuums or wet methods to avoid the spread lead dust to the floor below. (RAC 2)

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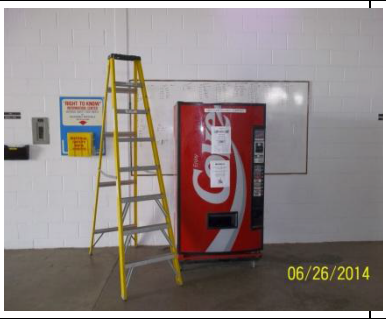
Table A-1
Surface Wipe Sampling Results for Lead
South Dakota Army National Guard
Mitchell Armory

Sample No. Location	Photo	Lead (µg/ft^2)
Surface Guidelines For areas open to the public, Break rooms, and kitchens		**40**
Surface Guidelines All other areas of the building		**200**
W-1 Drill Room on top of soda machine		**166**
W-2 Drill Room on white electrical box		**465**
W-3 Kitchen On ice machine		**42**
W-4 Kitchen Serving window		<10

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Sample No. Location	Photo	Lead (µg/ft^2)
Surface Guidelines For areas open to the public, Break rooms, and kitchens		**40**
Surface Guidelines All other areas of the building		**200**
W-5 Rehearsal Hall On supply air vent		**110**
W-6 DEERS Office On cabinet		<10
W-7 Blank		ND

Notes: 1) µg / ft^2 = micrograms per square foot of surface area. 2) ND = none detected. 3) "<" means less than the reporting limit for the analytical method.

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Laboratory Result Reports and Chain of Custody Sheets

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FOH ENVIRONMENTAL LABORATORY
536 S. CLARK STREET CHICAGO, IL 60605 PHONE: (312) 886-0413 FAX: (312) 886-0434

ANALYTICAL REPORT

Submitted To: USPHS / Federal Occupational Health
Denver Federal Center
Denver, CO 80225

Attention: Non-Responsive
Submitted By:

Reference Data: Lead
Sampling Site: NGB: Mitchell, SD (Armory)
Sample Media: Ghost Wipe(s)®
Method Reference: OSHA ID-121
Project ID: Project 11883
DFOH Lab Nos.: TM-14-68912 through TM-14-68918
Date Received: 07/08/14
Data Analyzed: 07/08/14 – 07/09/14
Date Issued: 07/10/14

The wipe samples were hot plate digested. The samples were run on a Perkin Elmer 200 flame atomic absorption spectrophotometer (AA).

General Lab Comments:
All quality control criteria have been met.
* All samples received in condition acceptable for analysis unless otherwise noted.
** Sample results have not been corrected for contamination based on the field blank or other analytical blank unless otherwise noted.

Analytical results are given on the enclosed tables. Results relate only to items tested. If you have any questions about these results, feel free to phone the Laboratory at (312) 886-0413.

Non-Responsive

AIHA LAP, LLC
ACCREDITED LABORATORY

Project 11883
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FOH ENVIRONMENTAL LABORATORY
536 S. CLARK STREET CHICAGO, IL 60605 PHONE: (312) 886-0413 FAX: (312) 886-0434

LEAD on WIPE RESULTS

SAMPLE NUMBER*	LABORATORY NUMBER	CONCENTRATION (µg)	CONCENTRATION (µg/ft²)
W-1	TM-14-68912	166	166
W-2	TM-14-68913	465	465
W-3	TM-14-68914	42	42
W-4	TM-14-68915	<10	<10
W-5	TM-14-68916	220	
W-6	TM-14-68917	<10	<10
W-7**	TM-14-68918	<10	

AGENCY	FLOORS	INTERIOR WINDOW SILLS	WINDOW TROUGHS
EPA	40 µg/ft²	250 µg/ft²	400 µg/ft²

Metals in Wipe Limits
(based on one ft² sampled area)

Analyte	Analytical Method	Method Detection Limit	Minimum Reporting Limit
Lead	OSHA ID-121	5.0 µg/ft²	10 µg/ft²

Non-Responsive

AIHA LAP, LLC
ACCREDITED LABORATORY

Project 11883
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FOIA Requested Record #J-15-0085 (SD)
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US PUBLIC HEALTH SERVICE, FEDERAL OCCUPATIONAL HEALTH CHAIN-OF-CUSTODY / FIELD DATA SHEET

536 S. Clark Street South, Suite 714
Chicago, IL 60605-1521
Tel: (312)-886-0413 Fax: (312)-886-0434

Non-Responsive

Agreement No.: A 106644
Statement of Work No.: S 180648
Project No: P 180649
Agency: ARNG
Proj. Manager: Mitchell Armory
Location (City, State): Mitchell SD

For Lab Use Only
Project /Report #: 11883
Due Date: 7/16/14
Samples Received Chilled? YES NO (circle one)
Conditions on Receipt with Name & Date
Rev. 07/2010

Container Types: P-Plastic, G-Glass, V-VOC
Preservatives: A-None, B-H_2SO_4, C-HNO_3, D-NaOH

STD- Standard
3D- Three Day Rush*
WH Weekend/Holiday*

Lead

Sample ID #	Type¹	Media²	Collected Date	Collected Time	Sample Location / Description	Air Flow (LPM)	Air Time (Min.)	Air Volume (Liters)	Wipe Area (ft^2)	Water Volume (Liters)	Code³	Turn Around Time*	Lab ID #
W-1	7	5	June	26					144			STD	TH-14-68912
W-2									144				68913
W-3									144				68914
W-4									144				68915
W-5									?				68916
W-6									144				68917
W-7					blank				—				68918

1-Air 2-Water 3-Paint 4-Soil 5-Dust 6-Bulk 7-Wipe 8 - Other

1-Charcoal 2-Matched Weight, 0.8um 3-PVC filter 4-M CE 0.8 um , 37 mm 5 -Ghost Wipes™ 6. Passive badge 7. Other

Non-Responsive

COMMENTS:

* Applied to organic and inorganic analysis in cases of an emergency only. @ Applied to inorganic and organic samples. SD: Applied to organic and inorganic samples 7-10 business days.

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National Guard Bureau
Mid-West Regional Industrial Hygiene Office
301-IH Old Bay Lane
Havre de Grace, MD 21078

ARNG-CSG-P September 30, 2014

MEMORANDUM FOR: The Adjutant General for South Dakota

SUBJECT: Surface Wipe Testing for Lead at the Sioux Falls Armory in Sioux Falls, South Dakota

National Guard Bureau (NGB) Mid-West Regional Industrial Hygiene (IH) Office field personnel conducted a survey on May 16, 2014 at the South Dakota Army National Guard Armory, located in Sioux Falls, South Dakota. This survey included a walkthrough of the facility and surface wipe sampling for lead contamination.

Occupational health risk assessment codes (RACs) are assigned to quantify health risks to personnel IAW DOD Letter of Instruction 6055.1, *DOD Safety and Occupational Health Program*. Risk assessment is an expression of health hazard severity and mishap probability, described in terms of route of exposure, actual exposure, exposure limit standards, potential health effects, duration of exposure, and number of exposed personnel. Guidance for RAC determination is attached to this memorandum.

Surface Wipe Sampling: Twenty wipe samples were collected on representative surfaces in the facility and analyzed for lead. For purposes of this report, any results that exceed the guidelines adopted by the NGB Mid-West Regional IH Office are considered significant.

Nine of the twenty wipe samples had detectable levels of lead. The sample collected on a speaker in the Drill room had a lead level of 170 ug/ft2. Four samples collected in the Food Storage had a lead levels ranging from 14 to 26 ug/ft2. A sample collected on a computer desk in the Starbase room 154 had a lead level of 11 ug/ft2. Three samples collected in the former firing range had lead levels ranging from 94 to 260 ug/ft2.

Recommendations

1. Clean the upper level surfaces in the drill room using high-efficiency particulate air (HEPA) filter vacuums or wet methods to avoid the spread lead dust to the floor below. (RAC 2)

2. Clean surfaces and items in the Food Storage rooms and the former firing range. (RAC 2)

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The NGB conducted this survey in the interest of preventing employee illness and to meet legal obligations where applicable. Results and recommendations are based on information provided by site personnel, field measurements, and conditions observed during the survey. For any further questions, please contact Non-Responsive .

Non-Responsive

Non-Responsive

Regional Industrial Hygienist

Appendix	Title	Status
A.	Lead	Attached

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FOIA Requested Record #J-15-0085 (SD)
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Appendix A
Lead

Surface Wipe Sampling

Twenty wipe samples were collected from representative areas of the facility using Environmental Express Ghost™ Wipes and templates IAW the OSHA wipe sampling method (OSHA Technical Manual, Appendix II, 2-1). The samples were analyzed for lead by OSHA Method ID-121. The results and photos are contained in Table A-1.

Although OSHA does not have published exposure standards for metal surface contamination, 29 CFR 1910 requires that all surfaces must be kept as free as practicable of accumulations of toxic metal dusts. In addition, DOD has instituted a policy to minimize surface contamination levels of heavy metals (*Control and Management of Surface Accumulations from Lead, Hexavalent Chromium, and Cadmium Operations*, DTM 12-003, 18 April 2012).

The NGB Mid-West Regional IH Office has adopted the guidelines for metal dust published in NG Pam 420-15, *Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges* and the Department of Energy (DOE)/Brookhaven National Laboratory *Surface Wipe Sampling Procedure* (IH75190). Any results that exceed these guidelines shown in Table A-1 are considered significant.

Nine of the twenty wipe samples had detectable levels of lead. The sample collected on a speaker in the Drill room had a lead level of 170 ug/ft2. Four samples collected in the Food Storage had a lead levels ranging from 14 to 26 ug/ft2. A sample collected on a computer desk in the Starbase room 154 had a lead level of 11 ug/ft2. Three samples collected in the former firing range had lead levels ranging from 94 to 260 ug/ft2.

Recommendations

1. Clean the upper level surfaces in the drill room using high-efficiency particulate air (HEPA) filter vacuums or wet methods to avoid the spread lead dust to the floor below. (RAC 2)

2. Clean surfaces and items in the Food Storage rooms and the former firing range. (RAC 2)

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Table A-1
Surface Wipe Sampling Results for Lead
South Dakota Army National Guard
Sioux Falls Armory

Sample No. Location	Photo	Lead (µg/ft^2)
Surface Guidelines For areas open to the public, Break rooms, and kitchens		**40**
Surface Guidelines All other areas of the building		**200**
W-1 Drill Room on speaker		**170**
W-2 Dining Hall room 161 On soda machine		<91
W-3 Kitchen on shelf		<91

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Sample No. Location	Photo	Lead (µg/ft^2)
Surface Guidelines For areas open to the public, Break rooms, and kitchens		**40**
Surface Guidelines All other areas of the building		**200**
W-4 Kitchen on oven		<10
W-5 Kitchen on freezer		<91
W-6 Food Storage On floor		26
W-7 Food Storage On metal shelf		24

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Sample No. Location	Photo	Lead (µg/ft^2)
Surface Guidelines For areas open to the public, Break rooms, and kitchens		**40**
Surface Guidelines All other areas of the building		**200**
W-8 Food Storage BDE On metal shelf		<10
W-9 Food Storage BDE On floor		<10
W-10 Food Storage cage On metal shelf		17
W-11 Food Storage cage On floor		14

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Sample No. Location	Photo	Lead (µg/ft^2)
Surface Guidelines For areas open to the public, Break rooms, and kitchens		**40**
Surface Guidelines All other areas of the building		**200**
W-12 Food Storage On floor		<10
W-13 Starbase room 153 On desk		<10
W-14 Starbase room 153 On screen TV		<10
W-15 Starbase room 154 On projector		<91
W-16 Starbase room 154 On electrical box		<91

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Sample No. Location	Photo	Lead (µg/ft^2)
Surface Guidelines For areas open to the public, Break rooms, and kitchens		**40**
Surface Guidelines All other areas of the building		**200**
W-17 Starbase room 154 On computer desk		11
W-18 Range On black case		**260**
W-19 Range On green table		120
W-20 Range On red pads		94
W-21 blank	-	ND

Notes: 1) µg / ft^2 = micrograms per square foot of surface area. 2) ND = none detected. 3) "<" means less than the reporting limit for the analytical method.

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Laboratory Result Reports and Chain of Custody Sheets

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FOH ENVIRONMENTAL LABORATORY
536 S. CLARK STREET CHICAGO, IL 60605 PHONE: (312) 886-0413 FAX: (312) 886-0434

ANALYTICAL REPORT

Submitted To: USPHS / Federal Occupational Health
Denver Federal Center
Denver, CO 80225

Attention: Non-Responsive

Submitted By:

Reference Data: Lead

Sampling Site:	NGB: Sioux Falls, SD (Armory)
Sample Media:	Ghost Wipe(s)®
Method Reference:	OSHA ID-121
Project ID:	Project 11801
DFOH Lab Nos.:	TM-14-67921 through TM-14-67941
Date Received:	05/28/14
Data Analyzed:	05/29/14 – 05/3014
Date Issued:	05/30/14

The wipe samples were hot plate digested. The samples were run on a Perkin Elmer 200 flame atomic absorption spectrophotometer (AA).

General Lab Comments:
All quality control criteria have been met.
* All samples received in condition acceptable for analysis unless otherwise noted.
** Sample results have not been corrected for contamination based on the field blank or other analytical blank unless otherwise noted.

Analytical results are given on the enclosed tables. Results relate only to items tested. If you have any questions about these results, feel free to phone the Laboratory at (312) 886-0413.

Non-Responsive

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ACCREDITED LABORATORY

Project 11428
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FOH ENVIRONMENTAL LABORATORY
536 S. CLARK STREET CHICAGO, IL 60605 PHONE: (312) 886-0413 FAX: (312) 886-0434

LEAD on WIPE RESULTS

SAMPLE NUMBER*	LABORATORY NUMBER	CONCENTRATION (µg)	CONCENTRATION (µg/ft²)
W - 1	TM-14-67921	60	170
W – 2	TM-14-67922	< 10	< 91
W – 3	TM-14-67923	< 10	< 91
W – 4	TM-14-67924	< 10	< 10
W – 5	TM-14-67925	< 10	< 91
W – 6	TM-14-67926	26	26
W – 7	TM-14-67927	24	24
W – 8	TM-14-67928	< 10	< 10
W – 9	TM-14-67929	< 10	< 10
W – 10	TM-14-67930	17	17
W – 11	TM-14-67931	14	14
W – 12	TM-14-67932	< 10	< 10
W – 13	TM-14-67933	< 10	< 10
W – 14	TM-14-67934	< 10	< 10
W – 15	TM-14-67935	< 10	< 91
W – 16	TM-14-67936	< 10	< 91
W – 17	TM-14-67937	11	11
W – 18	TM-14-67938	29	260
W – 19	TM-14-67939	13	120
W – 20	TM-14-67940	10	94
W - 21	TM-14-67941	< 10	

Surface Wipe Sampling Criteria

Metal	Acceptable Surface Level µg/ft	Basis for Criteria
Lead	250	EPA TSCA 40 CFR 745 and HUD Window Sills

Metals in Wipe Limits
(based on one ft² sampled area)

Analyte	Analytical Method	Method Detection Limit	Minimum Reporting Limit
Lead	OSHA ID-121	5.0 µg/ft²	10 µg/ft²

Non-Responsive

AIHA LAP, LLC
ACCREDITED LABORATORY

Project 11428
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US PUBLIC HEALTH SERVICE, FEDERAL OCCUPATIONAL HEALTH CHAIN-OF-CUSTODY / FIELD DATA SHEET

Environmental Laboratory
536 S. Clark Street South, Suite 714
Chicago, IL 60605-1521
Tel: (312)-886-0413 Fax: (312)-886-0434

Non-Responsive

PROJECT REFERENCE

Agreement No.:	A 106444
Statement of Work No.:	S 180648
Project No:	P 180649
Agency	ARNG-SD
Proj. Manager	Armory
Location (City, State):	Sioux Falls, SD

For Lab Use Only
Project /Report #: 1180
Due Date: 8/5/14
Samples Received Chilled? YES / NO (circle one)

Conditions on Receipt with Name & Date

Rev. 07/2010

Water Sample Codes[3]

Container Types:
P-Plastic, G-Glass, V-VOC

Preservatives:
A-None, B-H_2SO_4,
C-HNO_3, D-NaOH

Turn Around Time Codes[4]
STD- Standard
3D- Three Day Rush[B]
WH Weekend/Holiday*

Analysis Requested
Lead

ID #	Type[1]	Media[2]	Collected Date	Collected Time	Sample Location / Description	Air Flow (LPM)	Air Time (Min.)	Air Volume (Liters)	Wipe Area (ft²)	Water Volume (Liters)	Water Code[3]	Turn Around Time[4]	Lab ID #
W-1	7	5	May	15					50			STD	14-14-07921
W-2									16				07922
W-3									16				07923
W-4									144				07924
W-5									16				07925
W-6									144				07926
W-7									144				07927
W-8									144				07928
W-9									144				07929
W-10									144				07930
W-11									144				07931
W-12									144				07932
W-13									144				07933

Sample Type Codes[1]
1-Air 2-Water 3-Paint 4-Soil 5-Dust
6-Bulk 7-Wipe 8 - Other

Sample Media Codes[2]
1-Charcoal 2-Matched Weight, 0.8um
3-PVC filter 4-M CE 0.8 um , 37 mm
5 -Ghost Wipes™ 6. Passive badge
7. Other

Relinquished By | Date & Time | Received By | Date & Time

Non-Responsive

COMMENTS:

* Applied to organic and inorganic analysis in cases of an emergency only. [B] Applied to inorganic and organic samples, SD: Applied to organic and inorganic samples 7-10 business days.

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US PUBLIC HEALTH SERVICE, FEDERAL OCCUPATIONAL HEALTH CHAIN-OF-CUSTODY / FIELD DATA SHEET

Environmental Laboratory
536 S. Clark Street South, Suite 714
Chicago, IL 60605-1521
Tel: (312)-886-0413 Fax: (312)-886-0434

Non-Responsive

PROJECT REFERENCE

Agreement No.:	A 106644
Statement of Work No.:	S 180648
Project No:	P 180649
Agency	ARNG-SD
Proj. Manager	Armory
Location (City, State):	Sioux Falls, SD

For Lab Use Only
Project /Report #: 1180
Due Date: 6/9/14
Samples Received Chilled? YES / NO (circle one)
Conditions on Receipt with Name & Date
Rev. 07/2010

Water Sample Codes* | Turn Around Time Codes* | Analysis Requested

Container Types:
P-Plastic, G-Glass, V-VOC

Preservatives:
A-None, B-H_2SO_4, C-HNO_3, D-NaOH

STD- Standard
3D- Three Day Rush*
WH Weekend/Holiday*

Lead

ID #	Type¹	Media²	Collected Date	Collected Time	Sample Location / Description	Air Flow (LPM)	Air Time (Min.)	Air Volume (Liters)	Wipe Area (ft²)	Water Volume (Liters)	Water Code³	Turn Around Time⁴	Lab ID #
W-14	7	5	May	15				144 → ~~96~~				STD	TM-14-07934
W-15									16				07935
W-16									16				07936
W-17									144				07937
W-18									16				07938
W-19									16				07939
W-20									16				07940
W-21					blank				—				07941

Sample Type Codes: 1-Air 2-Water 3-Paint 4-Soil 5-Dust 6-Bulk 7-Wipe 8 - Other

Sample Media Codes: 1-Charcoal 2-Matched Weight, 0.8um 3-PVC filter 4-M CE 0.8 um , 37 mm 5 -Ghost Wipes™ 6. Passive badge 7. Other

Relinquished By | Date & Time | Received By | Date & Time

Non-Responsive

COMMENTS:

* Applied to organic and inorganic analysis in cases of an emergency only. ⁴ Applied to inorganic and organic samples, SD: Applied to organic and inorganic samples 7-10 business days.