

**From:** [Hays, David C Jr CIV USARMY CENWK \(USA\)](mailto:Hays_David_C_Jr_CIV_USARMY_CENWK_USA)  
**To:** [Dolislager, Fred; Walker, Stuart](mailto:Dolislager_Fred; Walker_Stuart)  
**Subject:** RE: ACE review of CPM  
**Date:** Thursday, May 15, 2025 9:36:37 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Fred, all others look good to me. I think may be best to just delete the red text below. They are model assumptions thus "accounted" for. I apologize for any confusion, was thinking stating model assumption such as these may help, but the sentence is ok without the red text.

Thank you  
Dave

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**From:** Dolislager, Fred <8fd@ornl.gov>  
**Sent:** Thursday, May 15, 2025 8:28 AM  
**To:** Walker, Stuart <Walker.Stuart@epa.gov>; Hays, David C Jr CIV USARMY CENWK (USA) <David.C.Hays@usace.army.mil>  
**Subject:** [Non-DoD Source] RE: ACE review of CPM


Dave,

Are my other recommendations for text changes acceptable?

Regarding comment 4 for section 4.3, I don't see how to best address your comment. I could change the section name to be "4.3 Detector Details and Model Assumptions" and not change any text. Or I could change the name and add a sentence to go to 2.2 to explore the limitations. I could also edit that one sentence as I suggested. "It is important to note that only the distribution of energy deposition pulses in the detector crystals are simulated; therefore, other factors that comprise the true detector response such as detector resolution, **100% efficient detector count to instrument count, zero dead time, background, and pulse pile-up are unaccounted for.**"

Or I could leave 4.3 as it is. I like it as it is.

If you had something else in mind, you may have to spell it out for me. Sorry.

Fred Dolislager  
(865) 576-5451 w  


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**From:** Walker, Stuart <Walker.Stuart@epa.gov>  
**Sent:** Wednesday, May 14, 2025 9:37 AM  
**To:** Hays, David C Jr CIV USARMY CENWK (USA) <David.C.Hays@usace.army.mil>  
**Cc:** Dolislager, Fred <8fd@ornl.gov>; Manning, Karessa <manningkl@ornl.gov>; Noto, Katie <boluska@ornl.gov>  
**Subject:** [EXTERNAL] RE: ACE review of CPM

Thanks Dave



Stuart Walker  
Superfund Remedial Program's  
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**From:** Hays, David C Jr CIV USARMY CENWK (USA) <David.C.Hays@usace.army.mil>  
**Sent:** Wednesday, May 14, 2025 8:45 AM  
**To:** Walker, Stuart <Walker.Stuart@epa.gov>  
**Cc:** Dolislager, Fred <8fd@ornl.gov>; Manning, Karessa <manningkl@ornl.gov>; Noto, Katie <boluska@ornl.gov>  
**Subject:** RE: ACE review of CPM

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Stuart, Good morning, Comment 4 was a different approach to previous comments. Suggest rather than state model limitations here, state the model assumptions. I like the stated limitations elsewhere in the guide but think good to have all model assumptions presented so users can note differences if needed.

Thank you  
Dave

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**From:** Walker, Stuart <Walker.Stuart@epa.gov>  
**Sent:** Tuesday, May 13, 2025 12:31 PM  
**To:** Hays, David C Jr CIV USARMY CENWK (USA) <David.C.Hays@usace.army.mil>  
**Cc:** Dolislager, Fred <8fd@ornl.gov>; Manning, Karessa <manningkl@ornl.gov>; Noto, Katie <boluska@ornl.gov>

**Subject:** [Non-DoD Source] FW: ACE review of CPM

Hi Dave, see attached Fred's response to your comments on the CPM calculator. On your comment 4 he was seeking some clarification.



Stuart Walker  
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**From:** Dolislager, Fred <[8fd@ornl.gov](mailto:8fd@ornl.gov)>  
**Sent:** Tuesday, May 13, 2025 11:45 AM  
**To:** Walker, Stuart <[Walker.Stuart@epa.gov](mailto:Walker.Stuart@epa.gov)>  
**Cc:** Manning, Karessa <[manningkl@ornl.gov](mailto:manningkl@ornl.gov)>; Noto, Katie <[boluska@ornl.gov](mailto:boluska@ornl.gov)>  
**Subject:** RE: ACE review of CPM

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Stuart,

Here are my proposed actions. One of the first ones, I'm not sure what the comment is all about. Feel free to share my proposals with the corps.

Fred Dolislager  
(865) 576-5451 w  
[REDACTED]

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**From:** Walker, Stuart <[Walker.Stuart@epa.gov](mailto:Walker.Stuart@epa.gov)>  
**Sent:** Thursday, April 24, 2025 10:16 AM  
**To:** Dolislager, Fred <[8fd@ornl.gov](mailto:8fd@ornl.gov)>  
**Cc:** Manning, Karessa <[manningkl@ornl.gov](mailto:manningkl@ornl.gov)>; Noto, Katie <[boluska@ornl.gov](mailto:boluska@ornl.gov)>  
**Subject:** [EXTERNAL] RE: ACE review of CPM

Thanks



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**From:** Dolislager, Fred <[8fd@ornl.gov](mailto:8fd@ornl.gov)>  
**Sent:** Thursday, April 24, 2025 10:04 AM  
**To:** Walker, Stuart <[Walker.Stuart@epa.gov](mailto:Walker.Stuart@epa.gov)>  
**Cc:** Manning, Karessa <[manningkl@ornl.gov](mailto:manningkl@ornl.gov)>; Noto, Katie <[boluska@ornl.gov](mailto:boluska@ornl.gov)>  
**Subject:** RE: ACE review of CPM

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Stuart,

The comments seem reasonable at first blush. When RSLs are done, we can make the redline user guide version.

Fred Dolislager  
(865) 576-5451 w  
[REDACTED]

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**From:** Walker, Stuart <[Walker.Stuart@epa.gov](mailto:Walker.Stuart@epa.gov)>  
**Sent:** Wednesday, April 23, 2025 4:58 PM  
**To:** Dolislager, Fred <[8fd@ornl.gov](mailto:8fd@ornl.gov)>; Kappelman, David <[Kappelman.David@epa.gov](mailto:Kappelman.David@epa.gov)>; Griggs, John <[Griggs.John@epa.gov](mailto:Griggs.John@epa.gov)>  
**Cc:** Mahler, Tom <[mahler.tom@epa.gov](mailto:mahler.tom@epa.gov)>; Hooper, Charles A. <[Hooper.CharlesA@epa.gov](mailto:Hooper.CharlesA@epa.gov)>; Manning, Karessa <[manningkl@ornl.gov](mailto:manningkl@ornl.gov)>  
**Subject:** [EXTERNAL] ACE review of CPM

Attached are comments from the Army Corps of Engineers on a peer review I requested on the CPM calculator. I did not have any issues with their comments.

Fred, when ORNL is able to address, please make **redline/strikeout** edits in the CPM User Guide so we can review.

Dave and John, if you have any comments or suggested language regarding the ACE's comments, please let us know. Ccing Tom and Chuck to see if they have any thoughts.

After incorporation of these comments that we can agree on I will try and move the draft CPM calculator through my management chain for finalization.



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**From:** Hays, David C Jr CIV USARMY CENWK (USA) <[David.C.Hays@usace.army.mil](mailto:David.C.Hays@usace.army.mil)>  
**Sent:** Wednesday, April 23, 2025 3:11 PM  
**To:** Walker, Stuart <[Walker.Stuart@epa.gov](mailto:Walker.Stuart@epa.gov)>  
**Cc:** Sleboda, Jena <[sleboda.jena@epa.gov](mailto:sleboda.jena@epa.gov)>  
**Subject:** RE: Radiation support request

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Stuart, please see my comments in the attached. Model worked fine and results seem reasonable. Most comments are to language in user guide or considerations in general.

Thank you  
Dave

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**From:** Walker, Stuart <[Walker.Stuart@epa.gov](mailto:Walker.Stuart@epa.gov)>  
**Sent:** Friday, April 18, 2025 9:26 AM  
**To:** Hays, David C Jr CIV USARMY CENWK (USA) <[David.C.Hays@usace.army.mil](mailto:David.C.Hays@usace.army.mil)>  
**Cc:** Sleboda, Jena <[sleboda.jena@epa.gov](mailto:sleboda.jena@epa.gov)>  
**Subject:** [Non-DoD Source] FW: Radiation support request

Hi Dave, did this radiation support request work its way down to you? Jena, the new Josh, hasn't heard anything.



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**From:** Sleboda, Jena <[sleboda.jena@epa.gov](mailto:sleboda.jena@epa.gov)>  
**Sent:** Wednesday, March 26, 2025 11:43 AM  
**To:** Filips, Michael R CIV USARMY CEHNC (USA) <[Michael.R.Filips@usace.army.mil](mailto:Michael.R.Filips@usace.army.mil)>  
**Cc:** Walker, Stuart <[Walker.Stuart@epa.gov](mailto:Walker.Stuart@epa.gov)>; Mahmud, Shahid <[Mahmud.Shahid@epa.gov](mailto:Mahmud.Shahid@epa.gov)>  
**Subject:** Radiation support request

Good morning,

Please see below for a request for radiation support under the EPA HQ IA.

Thank you,

**Jena Sleboda Braun**  
Environmental Engineer  
Construction and Post Construction Management Branch  
Office of Superfund Remediation and Technology Innovation, U.S. EPA  
Email: [sleboda.jena@epa.gov](mailto:sleboda.jena@epa.gov)  
Phone: (202) 566-0853

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**From:** Walker, Stuart <[Walker.Stuart@epa.gov](mailto:Walker.Stuart@epa.gov)>  
**Sent:** Tuesday, March 25, 2025 3:52 PM  
**To:** Sleboda, Jena <[sleboda.jena@epa.gov](mailto:sleboda.jena@epa.gov)>  
**Subject:** request for ACE review of draft CPM calculator

Hi Jena, I am requesting an ACE review of the draft Counts Per Minute (CPM) calculator. I would like the review to be completed within 3 weeks.

The CPM calculator has undergone an independent external peer review, an electronic validation, and a physical validation. In response to these reviews, a number of changes were made to the CPM calculator. I would like a peer review to ensure readability of the User Guide and other aspects of the CPM calculator before it goes to management for approval.

The draft CPM calculator may be found here:  
<https://epa-cpm.ornl.gov/>

These are password protected and can be accessed using:  
User name [REDACTED]  
Password [REDACTED]

On the Welcome page, there are two versions (8<sup>th</sup> grade and college level) 1 page fact sheets that provide a quick summary of the CPM calculator.

CPM Home	CPM Conversion
<h2>Welcome</h2> <p>Welcome to the EPA's Superfund Counts Per Minute (CPM) calculator. This tool is provided to help calculate the potential radiation detector reading, in counts per minute (CPM), that corresponds to a measured level of radioactivity in either pCi/cm<sup>2</sup> or pCi/g. Surface and volumetric contamination are converted to CPM by separate processes utilizing Monte Carlo N-Particle (MCNP) derived conversion factors. The CPM calculator is capable of converting activity in soil, steel, glass, drywall, concrete, and wood to CPM. To ensure proper application of the radiation conversion tool, please see further guidance from the <a href="#">User's Guide</a> and <a href="#">FAQ</a> pages. <b>In addition, Users of the CPM at a CERCLA site should consult with EPA Headquarters, Stuart Walker at <a href="mailto:Walker.Stuart@epa.gov">Walker.Stuart@epa.gov</a> (202-566-1148), David Kappelman at <a href="mailto:Kappelman.David@epa.gov">Kappelman.David@epa.gov</a> (303-487-6540), and John Griggs at <a href="mailto:Griggs.John@epa.gov">Griggs.John@epa.gov</a> (334-270-3401).</b></p> <p>The EPA has prepared a <a href="#">fact sheet for the general public</a> that describes CPM uses, CPM calculator operation, and situations (e.g. land uses, contaminated material, radiation detectors) available for assessment. Additionally, <a href="#">this fact sheet</a> describes the CPM calculator in greater detail for EPA staff.</p>	<ul style="list-style-type: none"><li>• <a href="#">Home Page</a></li><li>• <a href="#">User's Guide</a></li><li>• <a href="#">Frequent Questions</a></li><li>• <a href="#">What's New</a></li><li>• <a href="#">CPM Calculator</a></li><li>• <a href="#">Radionuclide Decay Chain</a></li></ul>



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## Comments to beta version of CPM Calculator 23 April 2025

1. Multiple combinations of inputs were ran and the model worked as expected. Did not run all input options so may be odd nuances that appear when used more but none found thus far.
2. With regard to the screen option narratives, specifically “requires TAC”: recommend this be deleted as required for all options. Additionally, consider adding statement of when FAC is required. Specifically for mixtures and when selecting options that “Does not require equilibrium...”.
3. Most model limitations are discussed in section 2.2, however a few are not. As an example. Recommend adding the statement following (from section 4.3) to section 2.2. It is important to note that only the distribution of energy deposition pulses in the detector crystals are simulated; therefore, other factors that comprise the true detector response such as detector resolution, dead time, background, and pulse pile-up are unaccounted for. Other potential limitations to consider adding to section 2.2 are dependent on answers to below comments.
4. I recognize that it is stated in section 4.3 that “...other factors that comprise the true detector response... are unaccounted for.” Recommend stating the resulting assumptions: 100% efficient detector count to instrument count, zero dead time, etc.. Think this will help users better understand limitations.
5. Does the model assume the detector is stationary, if so for how long? Some instrument’s 90% response time may be up to a few seconds although typically minimal with NaI. Recommend stating the assumption to better define how readings should be collected in the field. If not stationary, e.g. scanning, what is assumed observation window, etc..
6. My experience is FAC in soils is very heterogenic and often changes significantly from pre remediation to final status survey conditions, where I see this most likely being used (FSS) due to other limitations like grass shielding. Recommend users be cautioned that use of FAC requires homogenic conditions in section 2.2.

7. Many CPM results, for typical PRG values used on sites, are very low when considering counting uncertainty and detector critical levels. Recognize user guide has caveats in it regarding background and correction factors. Recommend a section or discussion be added to discuss that depending on TAC values the CPM results may be less than instrument detection limits, critical values, or within instrument counting uncertainty, and what corrective actions the user could take, if any?
8. Does the model account for soil moisture content? If so, recommend the value assumed be discussed. If not recommend discussing or state that it is not considered.