



U.S. Department of Housing and Urban Development

Office on Environment and Energy

Consultation on HUD's Draft Departmental Policy for Addressing Radon in the Environmental Review Process Notice (October 26, 2022)

Speaker 1: Welcome and thank you for joining today's conference consultation and listening session on HUD's departmental radon policy. Before we begin, please ensure you have opened the chat panel by using the associated icon located at the bottom of your screen. If you require technical assistance, please send a chat to the event producer. You can submit questions throughout the presentation to all panelists from the dropdown menu In the chat panel, enter your question in the message box provided and send. All audio lines have been muted until the Q&A portion of the call. We will give you instruction on how to ask a question at that time. With that, I'll turn the call over to Kristen Fontano, Director of the Office of Environment and Energy. Please go ahead.

Kristen: ... so much and thank you everyone for joining us this afternoon. I hope you are all well and I just want to sincerely send my appreciation for you taking time out of your busy days to join us for this important topic. We know radon is a known risk to human health and today we are seeking your feedback on a draft notice clarifying radon as a important element of our environmental compliance analysis and review. This is the second of these, of this particular get together and so if some of you participated with us last week, thank you for joining, again. The content is the same but the feedback certainly will be critical today just as it was last week. And with that, I'd like to introduce two members of my team who have worked long and hard to get us to this very important moment where we are able to seek your feedback.

The first is Lauren Hayes Knutson, who is the environmental policy division director here at HUD. And Kathy McNulty, our senior environmental program analyst who will be walking you through our understanding of the process as we are proposing it and the information as we understand it today.

So with that, I would love to turn it over to Kathy to take us on this journey and describe to us some of the important elements of this proposed notice. I also do want to make a comment here at the onset that we are also anticipating public comment and so that will be the next phase of this. And so this is not the last time you may see or hear about this before it goes final and Kathy may be able to provide a little bit of additional information in that regard as well. Again, thank you for your time. A tremendously important discussion here and certainly just as last week I know I will leave with new thoughts and new perspectives that you may in fact provide us as we continue to move forward in this space. So Kathy, over to you. Thanks again. Kathy, you're still muted. I can't hear you.

Kathy: Thank you.

Kristen: There we go. Good job.

Kathy: Welcome. This is Kathy. I'm going to provide a short overview to provide some context for this listening session on HUD's departmental radon policy. This is a draft policy, the consultation period for tribal consultation is open for submitting comments on the policy until December 3rd, but as Kristen noted, HUD is also working on publishing a notice in the federal register and at that point we'll be inviting also public comments on draft policy. So there'll be a second comment when we have a date for that federal register notice. We will send an announcement of the public notice comment using the same methods we use to announce these listening sessions. And in that case, if there is any questions, feel free to submit comments during the public notice comment as well. When the two comment periods end HUD we'll read and consider all the comments received and we'll be updating the policy as appropriate.

So this short overview the first part talks about we're going to, I'm going to explain the action that prompted the development of HUD's departmental radon policy. The next few slides after that highlight the information that's in the policy and then the last few slides explain how to document the environmental review to demonstrate that the project complies with the policy. So the event that prompted this policy in 2020, HUD's Office of Inspector General conducted an evaluation of HUD's program offices radon policies and the OIG found that HUD does not have a department wide radon policy.

Next slide please. And then next slide. And next slide. There we go. So and OIG found that HUD does not have a department wide radon policy that governs operations for all program office and that as a result, individual program office policies are inconsistent, and as a result of this inconsistency, HUD cannot ensure that residents in HUD assisted housing are protected from exposure to high radon levels and having inconsistent policies does not align with HUD's environmental regulations. The OIG further noted that HUD does not proactively track radon data for HUD assisted housing. Next slide please.

So to resolve this inconsistency, the OIG recommended that OEE issue a department wide radon policy that confirms radon is included in the definition of toxic and hazardous substances as those are described in HUD's contamination policy and that the department-wide policy should include radon testing and mitigation requirements that apply across HUD programs. And HUD should use HEROS to track radon testing and mitigation data. Note here, HEROS is not mandatory for documenting environmental reviews subject to part 58 and the radon policy does not implement any requirement to use HEROS or documenting radon. Next slide please.

Little refresher. Here's HUD's contamination policy in the first section it specifically references radioactive substances. The second part provides that projects that involve multifamily housing or project based vouchers must evaluate other evidence of contamination on or near a project site. And it notes that under part 58, the responsible entity is responsible for determining the investigations that are necessary to document the site is suitable for the proposed use and that it's free of contaminants, toxic

chemicals and gases that could affect the health and safety of occupants. Next slide please.

So radon is a radioactive gas that forms when radium and certain other radioactive metals break down in rock, soil and water. It can be found all over the US and as a gas it can easily infiltrate a building through openings such as cracks in the foundation, elevator shafts, provider pathway for radar on duct work, wall cavities, basement windows, construction joints and walls and floors. So anywhere there's a gap radon gas can infiltrate and move around the building. Radon from soil gas is the predominant source of radon on in indoor air water supply and emanation from building materials, very rare but possible. Next slide please.

So in response to the OIG's recommendations, OEE proposed a two-step resolution. The first step OEE would develop a department-wide policy that identifies radon as a radioactive substance and requires radon to be considered as part of the contamination analysis or activities that are categorically excluded subject to 58.5 and activities that require an environmental assessment or an environmental impact statement. So cadex subject to 58.5 levels of review are those that involve rehab activities such as replacing the roof, floor, kitchen cabinets, bathroom fixtures, stairs and so forth. And then as a second step, HUD will implement a radon testing and mitigation requirement, which must follow the administrative procedure act for formal rule making process which will include tribal consultation and public notice and comment when that comes about. Next slide please.

So this consultation and the listening session are about step one of HUD's two step response to the OIG's evaluation. Because HUD's not implementing testing and mitigation requirements at this point, we also had also included guidance on how to document in the environmental review that radon was considered and the project compliance with the policy. The department wide radon policy states that HUD's contamination policy at 24 CFR 58.5(i)2(i) includes radioactive gases in the list of contaminants of property must be free from. Because radon is a radioactive gas, it must be considered part of the contamination analysis and the contamination analysis applies to cadex subject to 58.5 environmental assessments and environmental impact statements. Therefore, to comply with HUD's contamination policy radar on must be considered as part of the contamination analysis and that contamination must be documented in the environmental review record. Next slide please.

So for the guidance piece, HUD has identified, since the policy does not require testing and mitigation, HUD has identified some other strategies that can be used to document that radon was considered in the contamination analysis. But the policy does note that the best practice for measuring the level of radon in indoor air is to test. Test the air using the ANSI/AARST standard is a current in district best practice. ANSI stands for the American National Standards Institute. It's a private non-profit organization that oversees the development of voluntary consensus standards for products and processes and AARST stands for the American Association of Radon Scientists and Technologists. It's also a non-profit professional organization and it focuses on radon measurement and soil gas mitigation and providing that information to the public. Because the ANSI/AARST standards and radon testing and mitigation standards were developed

using a voluntary consensus process, the EPA was able to participate in developing those standards and can use those standards in lieu of developing a separate set of federal standards.

So these radon mitigation and testing standards are available for free to view for free on the EPA's website and also on the ANSI/AARST website. And the standards are very detailed. They provide detail instruction on how to develop and document a radon test plan, how to interpret the test results and how to document the test plan. Similarly, the mitigation standards also provide very detailed information about how to conduct mitigation, different types of mitigation systems and different circumstances. But when testing is not otherwise required by the tribe, meaning that the tribe has not implemented radon requirements that are more strict than HUD's policy, the strictest standards always apply. Of course an alternative strategy is to use documentation, the EPA's radon zone map combined with the geologic studies and test data that the tribe or the state or the county may have gathered about radon levels in the area where the project site is located or CDC test data if that information is available where the project site is located.

Note that the EPA maps do not establish radon levels, neither do the CDC maps establish radon levels in a particular building. So using the alternative strategy would not document a radon level in the project in the building that's part of the project site but it will give you a reference idea of the conditions around the project site. Next slide please.

Another strategy that OEE identified is do it yourself tests that are intended for suitable for single family testing, indoor air in single family homes and for tenants to test their individual units. Follow the test instructions, document the test results in the contamination analysis, do it yourself tests. They're available for fairly low cost through the national radon program services website. Sometimes states offer them for low cost. We have a resource slide at the end that will give that gives the website information for the National Radon Program Services. The EPA's citizen guide also includes detailed instruction about how to use a test device, where to locate it, how to interpret test results and other guides on mitigation as well. We also found in our research that there is a tribe that had, because they were so remote, that the timeframes for shipping a radon test to the lab was causing invalid test results. And so they purchased a continuous radon monitoring device and trained staff to use it and that's what they're using to conduct testing for homes in their area.

Based on the comments we receive, HUD will also be developing and looks forward to developing some additional guidance on alternative approaches and other strategies that have been used and also from additional research that we'll be conducting. Next slide please.

Documenting the environmental review. Document the process that was used to evaluate radon in the environmental review record prior to signing it and prior to submitting the request for release of funds to HUD. So if the ANSI/AARST standard was used to conduct testing, then document the environmental review with a copy of the test report. The standard, the ANSI/AARST standard describes how to draft a test plan and so you would document the environmental review with that test plan. For do it

yourself and other radon monitoring using other radon monitoring test strategies. Talk document, the test device that was used, the period timeframe for the test, the test conditions, open house HVAC was stopped or it was raining humidity, what were the conditions around during that test day, and then the radon test results. You could also use the ANSI/AARST standards as a guide for documenting your test results and also if there were other site to the document sources that were used for the evaluation, the maps, any individuals that were consulted their name and credentials and title and mitigation plans if applicable are documented in the environmental review before signing as well. Next slide please.

More alternative strategies. When testing alternative strategies indicate radon levels that are high above 4 pCi/L. Document a mitigation plan in the environmental review prior to signing the environmental review and submitting the request for release of funds to HUD. Note that costs for radon testing and mitigation are eligible program costs that can be included in the project budget. Also testing is an exempt activity and can be done prior to during the environmental review process. Under 58.34 A 5 inspections and testing of properties for hazards or defects is an exempt activity. Next slide please.

This is just a graphic of the sort of process for if you are a project is new construction or reconstruction testing may result in a new will result in a new building. So it by definition has to take place after construction is completed. So for these types of projects, the test plan is developed and drafted as part of the contamination analysis and documented as mitigation in the environmental review prior to signing the [inaudible 00:18:47] and prior to submitting the request for release of funds to HUD. As I noted before, the ANSI/AARST standards provide great guidance for test plans. If you're using the standard, you would have the test plan and our good resource for drafting that plan after project activities are completed. Rest radon testing takes place prior to occupancy and then just up update the environmental review record with the test results. If results are above 4 pCi/L then develop a mitigation plan for installing a radon reduction system.

Whether a project involves testing or an alternative. One of the alternative strategies such as looking at the maps for new construction and reconstruction projects, HUD strongly recommends using radon resistant construction techniques. These techniques are also described in ANSI/AARST standards and on the EPA's website. If the new building should test above 4 pCi/L implementing radon resistant techniques to lower the cost of post construction radon mitigation. When using the alternative strategy, again document the ER prior to certifying the environmental review and submitting the request for release of funds to HUD. Next slide please.

For rehabilitation projects, whether you're conducting the radon test using the radon test device or the EPA maps and CDC information, document all that in the, document that evaluation in the environmental review record before signing the ER and prior to submitting the request for release of funds. And whenever of course whenever there is a potential that radon, well if testing, if it's four pCi or above or alternative strategy, if there potential for high radon level document a mitigation plan in the environmental

review record prior to signing it and sending a request for release of funds to HUD. Next slide please.

So these resources, these are the resources referred to in the presentation that the first one is the EPA rate map of radon zones and we note that the map of radon zones was not intended as noted before to predict the radon level in a particular building. But it was the intent was to assist tribes states, other interested parties with prioritizing their funding towards buildings radon reduction systems towards buildings that are in high radon zones. The ANSI/AARST radon testing and mitigation standards that are available the on that webpage for free, the national program services, they have a option to order a test the to do it yourself test. They also have a hotline so if you need some help or you don't understand something about how to implement a test, you can call the radon services hotline.

The National Radon Proficiency program provides a list of test devices that have gone through a quality assurance process and those are approved for testing. They've met a standard. The CDC, that's their link to their CDC testing. The CDC has been collecting radar on tests results from labs and states since late '80s, 1980s. It's not consistent across the country. They're working toward that goal.

HUD has a three part radon series that talks about testing and mitigation and it talks about radon good information about radar on both for single family and for multifamily buildings. So it's a great webinar and very informative if you haven't watched it yet. And then Radon Leaders Saving Lives is essential website. They offer training on how to conduct radon testing so in their calendar. So that's there just as a general interest. Next slide please. So HUD is very interested in learning about concerns with implementing the radon policy. We are committed to implementing a radon policy that can be clearly understood and applicable in a variety of circumstances. And so to that end, we are interested in hearing about any roadblocks that you have experienced with implementing radon evaluating radon and conducting tests and mitigation. Any strategies that you've developed that have been useful for you in your area where you're conducting testing and any other concerns, ideas or comments you have regarding the draft policy? I think I'll leave it at that and just open it up for comments, questions.

Speaker 1: As we move into the Q&A, we will be accepting questions both written through the chat and verbally. To submit a written question. You can select all panelists from the dropdown menu in the chat panel, enter your question in the message box provided and send. To enter the verbal question queue, please press the raised hand icon on your screen to enter the question queue. You will hear a beep tone when your line is unmuted. At that time please then state your name and your question. Once again, clicking the raised hand icon located at the top right above the chat panel will place you in the question queue. So we have one question in the chat so far. A caller asks, So if my tribe is a low risk area on the EPA map, then I don't have to test, just say we are low risk.

Kathy: Well there's two choices for documenting radon compliance in the environmental review. One is testing, that's the best practice. The other is evaluating the documentation EPA radon, using the EPA radon map, the CDC testing. So whichever

choice you make for evaluating radon, that's what you would document in the environmental review. And so that you would document the low risk.

Speaker 1: Another caller asks, will you accept DIY tests or do they have to be approved devices?

Kathy: They should be approved devices and the National Radon Program Services devices when you order those are approved devices and then you can use that list from the National Radon Program efficiency, forgetting now what the ... It's the National Radon proficiency program approved list of test devices. Because those devices have all been through a quality assurance evaluation and we know that they work and would be the most accurate in measuring the radon level inside. Thank you for that question.

Speaker 1: Another caller asks, can you give examples of radon resistance construction techniques?

Kathy: Not in this webinar. You can look at the EPA's website they have because there's a building and architectural design kind of a thing. So I would say look at the ANSI/AARST standards on the EPA website and then the EPA website also has a link to radon resistant construction techniques and they'll go into all the different circumstances and what those techniques are. But thank you. That's good to incorporate in our policy.

Speaker 1: Another caller asks, are radon maps going to be updated?

Kathy: The EPA radon? Yeah, we don't, HUD is not the owner of the maps. It's unlikely that the EPA radon map will be updated because of the work that went into it. It took many, many years. So the CDC maps are updated as they receive lab tests results from the labs and from the states. So they are continuously being updated and then I can't speak to any state or tribe collected information how that's updated or filed.

Speaker 1: Pausing the chat questions quickly because we have a hand up caller, your line is unmuted. You can go ahead.

Wayne: Thank you. This is Wayne Isaacs for the Cherokee Nation and one of the concerns I have is, and the standards actually speak to this too, is the suggestion that really this should be done in the winter months when you do radon testing, when the house has extended periods where it's sealed up rather than in the summer. My concern is you can get a false negative on a house if you tested it, say in July, and then you could go back in January and it would be above the action level. So how do we address that?

Kathy: Thank you. That's a great point and that's a recommendation that we can include in our policy, consider to include, and let people know about the advantages and disadvantages of different ways of testing. Thank you for that comment.

Speaker 1: We have another caller who asks what funding will be available to tribes if this policy will be enforced.

Kathy: Right now there is no specific radon funding, but radon testing and mitigation is a program is a eligible program activity and so it can be included in the project description with the existing funding.

Speaker 1: We have another caller ask, I may have missed this. Who would be funding the mitigation if needed?

Kathy: Who would be what, excuse me?

Speaker 1: Who would be funding the mitigation if needed?

Kathy: The mitigation is funded out of the program funds that are existing program funds. Right now there is no specific funding from Congress for radon testing or mitigation.

Speaker 1: We have a question in chat. Oneida Housing Authority's now comprehensive housing division is 100% grant funded by HUD. Would the department wide policy mean that Oneida Housing Authority is required to do implement radon testing and mitigation requirements in all its existing and or new construction of housing units?

Kathy: The radon policy does not require radon testing. There's a choice. You can conduct radon testing. The policy provides a choice. You can conduct radon testing or you can conduct that document review, but thank you for describing your circumstance.

Speaker 1: Another question, what is the expected date that these requirements will be implemented and how long will tribes have to be compliant?

Kathy: So we don't have an implementation date because we are going through public comments and we're we'll be revising the draft notice based on comments and it will be reviewed again. So we don't really have an implementation date yet.

Speaker 1: All right. We have another hand raised in the verbal queue. Caller, your line is unmuted. You can go ahead.

Wayne: Yeah, this is Wayne Isaacs with Cherokee Nation again. I think one of the most disturbing things right now is the fact that we have no radar on mitigation firms in Oklahoma. So I don't know how we would proceed in resolving these issues when we don't have anybody to turn to help us with that mitigation.

Kathy: Thank you for that comment, that's really important for us to consider in the policy so that it's implementable.

Speaker 1: All right, our next question in chat, will active historical projects need to be tested and show the testing reports in the air documents, or is this only for current rehab and new construction projects?

Kathy: Can you repeat that please?

Speaker 1: Absolutely. A caller asked, will active historical projects need to be tested and show the testing reports in the air documents or is this only for current rehab and new construction projects?

Kathy: So the policy when it's implemented will be for projects that are forward, it's forward thinking, it's not going to go back into projects that have been completed. So if the policy or if the policy is implemented, then it would be for projects from that point forward. Thank you.

Speaker 1: Another caller asks, will the 2023 IHP need to be modified for radon testing funds for the grant yearly or five year IHP?

Kathy: That is a program question. You mean that would need to be addressed by the program office, whether if you do testing, if it requires updating an IHP for radon testing.

Speaker 1: Another caller asks. Does anyone have any idea of the costs involved with mitigation?

Kathy: Mitigation costs, ANSI/AARST did some research and came up with a chart. We can, let me look at that and send it out to everyone on the program on this, everyone on the list. Let me see if I can find it while I'm waiting for another question.

Speaker 1: All right. We have another caller ask if a property has been tested one time, will we need to test when we rehab it later?

Kathy: Thank you for that question. That's a good point that the policy should include some guidance on retesting. ANSI/AARST standards, I believe set out some industry standards on when retesting takes place, but the policy doesn't include that right now.

Speaker 1: There are no further questions in the queue at this time, but just as a reminder, we will be taking written questions through the chat or you can press the raise hand icon to enter the verbal question queue. And it looks like we do have one caller in the verbal question queue. Caller, your line is unmuted. You can go ahead.

Colleen: Thank you. Good afternoon. My name is Colleen Diskin and I serve as the executive director for the Association of Alaska Housing Authorities. I think there are others on the line that'll also be making comments, but when you do bring up that chart, it would be interesting to see about the cost of remediation and then you think about adding on at least 25% for our tribes and tribal communities here in Alaska. I think that also it's important to note that although it might be best practice in a lot of communities and not have seen the map and not taking a deep dive into the maps and the documents that you talk about that show where the potential radon impacts might be without seeing that. I would recommend that talking about best practices but implementing as a mandate are two different things. And I do not think that this should be mandated on our tribes and TDAGs. We're talking about funding that for our IHBG that's been flat for the past two decades and if this is something that's going to be required of our tribes and TDAGs and I would hope that all of HUD would fight to increase our Indian housing block grant because this would be an unfunded mandate.

Like the guy from Oklahoma had stated. We also have very short or a short list of people that could remediate and I would hope that also the training and certification piece would be thoroughly thought out on how we're going to train our tribes to get. Last comment that I'll make, and I didn't catch exactly the timeframe that you talked about when, when you go from testing or when you actually physically do the test for it to get to a lab, we don't have the luxury of even a post office in some of our remote communities, let alone a plane that will take out mail every day. So even though there might be the alternatives where you're talking about continual testing, that also just costs money. And so I think it's an unfunded mandate. I think there should be best practices published and without looking at the maps, knowing exactly where the high impacts might be, I think it should be recommendation and never a unfunded mandate for our tribes to do. Thank you.

Kathy: Thank you for that very important comment.

Speaker 1: All right, we have another comment in the verbal question queue. Caller, your line is unmuted. You can go ahead.

David: Hello, this is David DeLong with Vena Tie Village Housing Organization and I think I saw a statement regarding exemption for houses that are built off the ground because of permafrost. We have a lot of buildings that we don't put in ground foundations, so there's no pathway for the radon to make it into the house. So if there was an exemption for those sort of buildings, as the last caller said, we don't need any additional demands on us at this time. But yes, I think I saw a state. I would just like to remind you or urge you to maintain an exemption for houses that are not in contact with the ground or have open crawl spaces. Okay, thank you.

Kathy: Thank you.

Speaker 1: We have another caller in the verbal queue. Caller, your line is unmuted. You can go ahead.

Malia: Hi, this is Malia Cox from the Department of Hawaiian Homelands. We have similar concerns to our friends up in the Alaska area. Hawaii in its entirety is actually in zone three. Generally houses don't have basements. So it seems like this is kind of a huge burden if there aren't exemptions put in place for things. Also like testing, because we are in the same boat, a lot of times we have everything pretty much has to be sent to the mainland for testing. And so if it has a short cycle time then they're not going to get great results. So it is, we are struggling a bit with the idea that this would be a country wide mandate without really looking at how things are happening on the ground in individual areas.

Kathy: Thank you.

Speaker 1: That is all the questions we have in the verbal queue right now, but we do have a comment coming in through the chat. Personal experience is our tribe has used EPA grant funds in the past to do radon testing in our income based housing. And we did find

some levels above four, but we did not have funding to do mitigation and many grants that we considered to cover mitigation costs required a homeowner, but our low income based housing units do not have homeowners, so we could not apply.

Kathy: Thank you for that information.

Speaker 1: Another question from the chat is if we have to mitigate and we have to relocate the tenant, who pays for that?

Kathy: So relocation, HUD has relocation funds but don't, that's a different program, but thank you for that point. We will of course consider that, bring that into our consideration.

Speaker 1: We do have another hand up in the verbal queue. Caller, your line is unmuted. You can go ahead.

Colleen: Thank you again, this is Colleen with the Association of Alaska Housing authorities. I think HUD has a policy, URA policy the relocation policy. I don't think that, I believe that tribes and TDAGs need to consider relocation within their budget for when they have to relocate. But somebody else can correct me if I'm wrong. The that's not the point that I wanted to make. The question that I have, Kathleen, is when I know that this isn't going to be something that's going to be even probably a year from now, but what are your thoughts and processes of ... What is the next steps and how do we get there? It's my understanding that this will, then all the comments will inform the draft, which then would inform a rule making and what does that actually look like? Because making to somebody that's in Indian housing might be, it is totally different probably than from what might be under this type of rule making. And how do we ensure as tribes and TDAGs that our voices are still heard within that rule making realm?

Kathy: Thank you for that question. This draft policy is step one. And so this, once we get comments and recommendations and we will look at the policy revise as applicable. The policy doesn't require testing, but the next step, that's step two for implementing step two of the OIG recommendation that HUD implemented testing radon testing and mitigation requirement. That isn't going to be in the very near future, but that policy will go through rule making. And rule making means the same thing. It's across the board. It requires public notice and comment. It requires tribal consultation, rule making consultation. And so it would be a more robust consultation and public notice period than what we're doing here for this radon policy, which is considered subregulatory guidance. Does that that answer the question about making?

Colleen: Yeah, I think it does. But rule making for the office of Native American programs is a consensus based rule making process. So I think it would be a little bit different, but neither here nor there I guess.

Kathy: Well no, the tribal consultation takes place before the public comment period. It begins before the public comment period. And so the consultation, HUD's consultation policy, tribal consultation policy applies to all HUD program offices. So we would be following that.

Speaker 1: We do have another comment through the chat. Radon requires a lot of tracking, reporting, equipment, calibration tracking, QA/QC tracking. It requires a whole program to be set up in order to teach your own staff to do housing stock. Again, unfunded mandate.

Kathy: Thank you for that comment.

Speaker 1: Those are all the comments and questions we have in queue at this time. But one more reminder, you can submit questions or comments through the chat or press the raised hand icon just above the chat panel to enter the verbal question queue.

Kathy: So I found the ANSI/AARST average costs across the industry costs. So mitigation, do it yourself testing is around 20, \$25 at the low ends. In some places you can get free, do it yourself test devices. For multifamily mitigation is about for single family is the EPA estimate is 800 to 2,500 and the ANSI/AARST estimate is 1500 to 3000 for single family home and multifamily is 2,500 to 4,000 per unit. However, those costs can be applied to up several units. So several units can share the same mitigation system. So that just depends on the building. And if you're using a radon professional, the ANSI/AARST estimate for testing is \$50 to \$80 per unit. And not all units in a multi-level building require testing. Usually it's ground floor and depending on the pathways that the building seems to have, it could be a unit or two above the ground floor, the ground contact floor.

Speaker 1: There are currently no further questions or comments in the chat or the verbal question queue. Oh, one just came in. A caller asks what are the risks to not doing testing any liability for not testing?

Kathy: That's a legal question and I don't know. So that's not a question that I think we can address here.

Speaker 1: Another caller comments, the quotes we got in Alaska were over \$400 per unit if we gave them a large quantity to test all at once. Mitigation is much more.

Kathy: Thank you for sharing that. I thought that Alaska would probably be more expensive or any other circumstances where there's remote.

Speaker 1: There are no further questions in the verbal or the chat, but if you would like to make a comment or question, you can press B raise hand icon or enter your question or comments through the chat box. If there are no further questions, I'll turn the call back over to Kathy McNulty.

Kathy: Next slide please. So this is our second and last virtual listening session, December 3rd, the comment period ends. So please submit your comments. We've recorded and noted your comments during this session so you don't have to resubmit those. Thank you very much for your comments. Those they are very important to us in extremely important for us to know that what is going on across the country and not just in certain areas. So it's really important for us to know where these circumstances are that for instance, in

Alaska where it's so extremely expensive and difficult to implement a testing policy. December 4th, OEE will start revising the draft and reading comments and discussing them at And when the notice is ready for publication, it needs to go, it'll be vetted through HUD and it needs to be reviewed and at some point it will be published.

And that note, a notice of the publication will go out using the same method that we use to let you know about these listening sessions. It'll be posted on the HUD exchange. It'll be a broad announcement of when that notice is published. There will be training webinars that grantees can attend and that an announcement of those webinars will go out as well. Again, thank you very much for taking your time to be here to raise the concerns that you have regarding implementation of the policy. It's really important and appreciated that you came and spoke up and I believe that's it. Oh, there's a couple more questions. Sure.

Speaker 1: Okay. Last few questions. A caller asks, will the HUD contamination and toxic substances worksheet be revised to include steps for testing and mitigation processes for radon?

Kathy: Yeah, well, I don't know specifically whether that piece that will be revised, but yeah, we'll be going for a revision to incorporate a radon policy into all our guidance documents and on the environmental guidance on the HUD exchange.

Speaker 1: All right. Another caller asks, can you reiterate what type of buildings would fall under radon testing and mitigation requirements?

Kathy: So the policy right now is that testing is not required and the other choice is to look at the EPA maps, CBC testing data maps, or any maps or information that the state or the tribe has collected regarding radon levels in your particular area.

Speaker 1: All right. Another caller asks, is it expected that the testing will be allowable by a non-certified tester?

Kathy: For the policy, or are we talking about the future development of testing radon testing and mitigation requirements? So the radon policy doesn't require the ANSI/AAST testing standard, which is intended to be implemented by on professional right now. At this point, a non-professional person could take the ANSI/AARST standard and use it, if they have the skills and knowledge for implementing that test plan. Does that answer the question and thank you for that comment. That's something for us to note in the policy.

Speaker 1: The final comment we have in the chat is just as a reminder, while Alaska deals with high cost due to its remoteness, all the Pacific Islands are in the same boat. Hawaii, American, Samoa, Guam.

Kathy: Right. Thank you.

Speaker 1: We have one final question from the verbal queue and then we can conclude today's conference. Caller, your line is unmuted. You can go ahead.

Wayne: Yeah. This is Wayne, for Cherokee Nation again. And forgive me, I may have missed this. So when do we need to start reporting this to the environmental review? I mean, I know we're not required to test right. We can look at the maps and those things, but when do we need to actually put the verbiage into the environmental review documents?

Kathy: The radon policy is not implemented until it's published. So when it's published, then that's when it will be implemented. So it's at a future date and there will be an announcement about that, the rate policy's published, and then there'll be webinars shortly following there that about how to implement the policy so it's not implemented until publication and we don't have that date right now in the future. Thank you.

Okay, so thank you all. I think this concludes. It's 5:02. So this will conclude our listening session. Thank you again for taking the time to be here and share your concerns. They are heard and recorded, so it will be considered. Thank you very much.

Speaker 1: That concludes today's conference. Thank you for using Event Services. You may now disconnect.