



## Radon Policy

### Why this policy is important

The purpose of this policy is to establish a program and procedures related to radon testing and mitigation for the safety of residents, community partners and staff that live or work in Home Forward Properties.

### Who needs to know and understand this policy

This policy must be followed by all regular employees, temporary employees, contractors, vendors or anyone who:

- Is exposed to radon in the workplace under normal conditions or in a foreseeable emergency; or
- Oversees compliance, maintenance, rehab or construction in buildings owned and/or managed by Home Forward.

While residents and participants are not required to know and understand this policy, Home Forward will provide this policy publicly to ensure accessibility.



Topic	Date Effective/Revised
Potential Hazards and Risks .....	.01-2020
Testing and Re-testing.....	.01-2020
Mitigation .....	.01-2020
Radon Professional.....	.01-2020
Utility Allowance.....	.01-2020
Notification .....	.01-2020
Safety Protocols and Strategies .....	.01-2020
Record Keeping .....	.01-2020
Failure to Comply.....	.01-2020

## Potential Hazards and Risks

Residents, employees, contractors and vendors have the potential to be exposed to harmful radon radioactivity.

Radon is a colorless, odorless, and tasteless radioactive gas that comes from the natural decay of uranium and some other radionuclides that are present in soil. Radon is responsible for most of the public's exposure to ionizing radiation. Radon gas can accumulate in buildings, especially in ground floor and basement areas. Radon penetrates cracks and drain openings in foundations, basements, and crawl spaces. Some building materials will also release radon into the air. Long term exposure to radon may cause or increase the risk of lung cancer in humans.

The Environmental Protection Agency (EPA) and the US Department of Housing and Urban Development (HUD) recommend mitigating units/locations where the picocuries per liter (pCi/L) are at or above level 4.0.

## Testing and Re-Testing

Testing is the only way to find radon levels in our properties. It is Home Forward's policy to test and re-test for radon in all of the properties that we own. Radon testing must follow the protocols set by the American Association of Radon Scientists and Technologists, and the protocol for Conducting Radon and Radon Decay Product Measurements in Multifamily Buildings (ANSI-AARST MAMF, Section III or similar section in the most recent edition). In cases where it is not reasonably possible to follow protocols set by ANSI-AARST, Home Forward may implement an alternative approach to meet ANSI recommendations if the alternative approach has a substantially similar impact or outcome. See Home Forward's Radon Procedures Manual for more information about radon testing and re-testing requirements.

## Mitigation

Radon resistant construction is required for all new construction.

During testing of existing buildings, if a certified Radon Professional finds levels are above the levels recommended by the Environmental Protection Agency ( $\geq 4.0$  pCi/L), a mitigation plan must be developed to ensure that mitigation is completed within 12 months by a radon professional until radon levels are below recommended levels ( $< 4.0$  pCi/L). Mitigation and radon resistant construction must conform to the most restrictive standard provided by ANSI, ASTM, HUD, OSHA or EPA.

Residents of buildings where a Radon Professional contracted by Home Forward found elevated levels of radon do not have to be relocated, but may request a reasonable accommodation. Home Forward will consider requests for a reasonable accommodation according to local, state, and federal requirements.

## Radon Professional

All testing and mitigation must be performed under the supervision of a radon professional. Radon Certification/License of the radon professional is required as follows: Certification from either the American Association of Radon Scientists and Technologists (AARST) National Radon Proficiency Program (NRPP) or the National Radon Safety Board (NRSB).

## Utility Allowance

If a Home Forward resident or participant's utility bill increases because of the installation of a mitigation system, their utility payment will be adjusted according to Home Forward's procedures for rent setting relevant to their subsidy/unit.

## Notification

It is Home Forward's policy to provide tenants and staff of Home Forward buildings with information about the health risks of radon and information related to the testing and mitigation of radon in Home Forward buildings.

Anytime that Home Forward must send a copy of the test results to tenants or staff (see below), they shall do so within 30 business days of receiving the test results from a certified radon professional. Home Forward will always make a copy of the test results available upon request to tenants and staff who live or work in a building that received testing within 45 business days of sending a notification that testing will occur.

Prior to initial testing or re-testing of a building, Home Forward will provide all tenants and staff who live or work in a building with information about radon testing and mitigation, including information about under what circumstances they will receive test results. Home Forward will also notify tenants and staff that test results are always available upon request within 45 business days of receiving notice that radon testing will occur.

After initial testing or re-testing of a building, Home Forward will provide tenants and staff who live or work in a building with information about test results and any needed mitigation as follows:

- Any unit  $\geq 4.0$  pCi/L: All tenants and staff who work or live in the tested building will be notified that elevated levels of radon will be mitigated, including an approximate timeframe for mitigation services. Tenants and staff who work or live in the tested building will receive a copy of the test results. All residents will also receive information on radon risks and be referred to State or local radon division or health department officials who can appropriately advise them on their health risks.
- All units  $< 4.0$  pCi/L: All tenants and staff who work or live in a tested unit will receive a copy of the test results. Tenants and staff who do not live or work in a tested unit may receive a copy of the test results upon request.
- Inconclusive or void: All tenants or staff who work or live in the unit that was inconclusive or void will be notified that Home Forward may re-test or may wait for mitigation work to be complete before re-testing.

During mitigation, a certified radon professional may need to test for radon multiple times to see if the radon mitigation system is working or if more mitigation is needed until mitigation is complete (all results <4.0 pCi/L). During this process, tenants and staff of tested units will receive a copy of the test results for each test. Test results will be made available upon request for tenants and staff in units that were not tested.

Once mitigation is complete and all test results are below 4.0 pCi/L, all tenants and staff who live or work in the building will be notified that mitigation is complete. Tenants and staff of tested units will receive a copy of the test results and tenants and staff of untested units may receive results upon request.

Incoming residents must be notified of radon prevention, testing, and mitigation activities in their building at move-in.

It is Home Forward's policy to make notifications as accessible as possible for tenants and staff. To accomplish this, Home Forward must ensure that all notifications to residents include translation inserts in accordance with Home Forward's Limited English Proficiency (LEP) Plan and information about how to improve indoor air quality (*Home Forward's "Tips for Air Quality" flyer*). Home Forward must also make translation services related to notifications available if requested by a resident.

For more information about notifications to tenants and staff, see the "Notifications" section of Home Forward's Radon Procedures Manual.

## **Safety Protocols and Strategies**

For Staff:

While occupying areas in Home Forward properties where radon test results show elevated radon levels ( $\geq 4.0$  pCi/L), staff must follow Safety Procedures outlined in Home Forward's Radon Procedures Manual to improve indoor air quality in their work space.

For Residents:

Home Forward will provide information to all residents about how to prevent high levels of radon in unit including opening all windows and turning on exhaust fans; all notifications to residents related to radon should include a copy of the *Home Forward "Tips for Air Quality" flyer*.

## **Record Keeping**

All test and mitigation reports will be stored in accordance to Home Forward's document retention policy.

## **Failure to Comply**

Failure to comply with the Radon Policy and/or any other safety policy may result in disciplinary action up to and including termination.