



HUD Radon Updates

April 19, 2017

Radon Testing Standards

- HUD requires following the most recent version of the *ANSI-AARST* standards for testing:
 - ***MAMF-2017 (released 3/1/17) Multifamily Buildings*** standard for Multi-Family properties
 1. Testing by a certified Radon Professional
 2. Test 100% of ground contact apartments
 3. Test occupied non-residential, ground contact rooms
 4. Test 10% of apartments on each upper floor of each building
 5. Test for a minimum of 2 days
 - ***MALB-2014, Large Buildings standard for LEAN (extended care) facilities***
 1. and 2. same as above
 3. Test occupied non-residential, ground contact rooms and unoccupied ground contact rooms that can be converted for occupancy (rooms provided with HVAC)
 4. Test 10% of rooms on 2nd and 3rd floor and at least one room on each floor above the 3rd floor
 5. Test for 3-4 “significantly occupied days”

K

HUD Requirements for Refinance

Steps for Refinance

- Initial 25% or 100% screening and Radon Report:
 - Multi-Family
 - Not required for low risk (Zone 3) radon zones.
 - Required for medium risk (Zone 2) and high risk (Zone 1) radon zones.
 - LEAN
 - Required for ALL radon zones.

25% Screening Option

- ❑ Test per AARST except only test 25% of ground contact units (MAP), occupied rooms, and unoccupied rooms that can be converted to occupancy (LEAN).
- ❑ Still test upper floors per AARST standards.
- ❑ Cannot test just 25% in states that require 100%: IA, IL, ME, OH.
- ❑ NEW MAMF-2017 Policy REQUIREMENT: If any result is ≥ 4.0 pCi/L, Follow-up testing procedures to include 100% of all ground-contact areas and dwelling units, and not less than 10% of the dwelling units on each upper floor in all buildings associated with the testing survey (Section 7.1.8.1 Elevated Radon (e.g., ≥ 4.0 pCi/L))

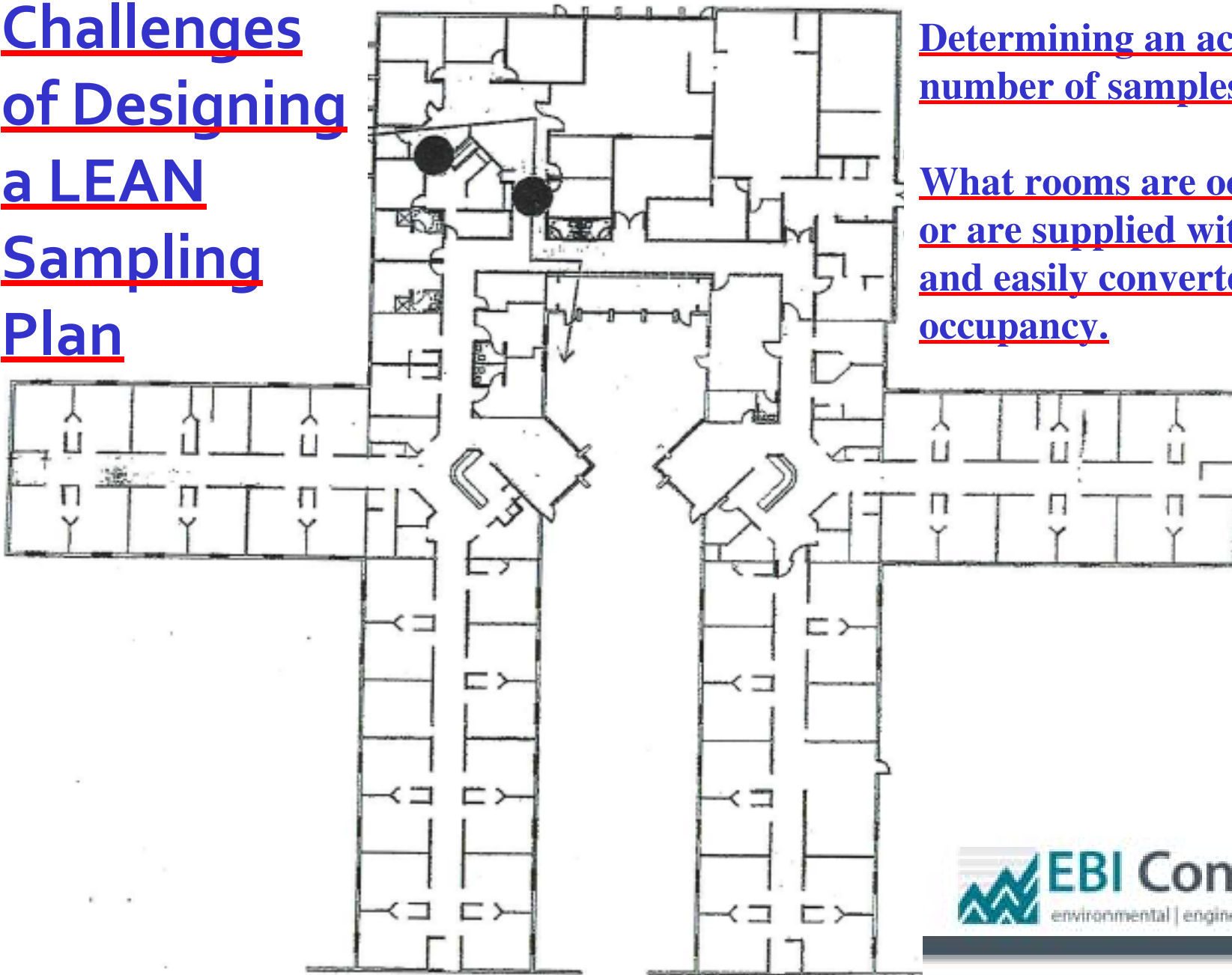
25% Screening Option

- ❑ HUD will still permit initial testing of 25% ground-contact units when applicable; however, if any results are elevated (≥ 4.0 pCi/L), a repeat assessment must be conducted and include ALL previously tested units (ground-contact and upper floors), and 100% of the remaining untested, ground-contact units across the entire property.
 - Retest locations that were <4.0 pCi/L
 - Retest the test locations that were ≥ 4.0 pCi/L
 - Test any location where the initial test was voided, lost or tampered with
 - Test 100% of ground floor units
 - If 100% follow up testing is not performed, mitigate 100%

Whether to Choose 25% or 100% Testing

- Testing 100% initially may be cheaper than testing 25% with follow-up testing of the remaining 100%
 - due to the multiple mobilizations and reports.
- If one or more elevated results are anticipated, the 100% ground-contact full assessment is the most cost effective first step.
- Suggested:
 - Zone 1 (High Radon) – 100% Initial testing
 - Zone 2 (Moderate Radon) – 100% Initial testing
 - Zone 3 (Low Radon) – 25% Initial screening may be a safe bet. *(Relevant for LEAN projects only)*

Challenges of Designing a LEAN Sampling Plan



Determining an accurate number of samples.

What rooms are occupied or are supplied with HVAC and easily converted for occupancy.

Radon Mitigation Systems

Radon Mitigation Systems Installed on Existing Buildings

❑ Multi-Family

- (Multi-Family Buildings) *ANSI/AARST RMS-MF 2014 Radon Mitigation Standards for Multifamily Buildings*
- (Single Family structures) *ASTM E2121-13 Standard Practice for Installing Radon Mitigation Systems in Existing Low-Rise Residential Buildings*

❑ LEAN

- *ANSI-AARST RMS-LB 2014, Radon Mitigation Standards for Schools and Large Buildings*

O&M Plan Required for Active (Fan-Powered) Mitigation Systems

- ❑ Maintenance of the Active Mitigation System is required for the duration of the insured mortgage
- ❑ Development and implementation of a formal O&M Plan is required.
- ❑ Key components:
 - Routine monitoring and equipment maintenance schedule
 - Provisions for Non-routine repairs – i.e. fan replacement
 - Ongoing monitoring of Radon levels (testing every 2 years)
 - Records management
- ❑ Include the O&M Plan in the amended Radon Report upon completion of mitigation system installation

Radon Resistant Construction for 221(d)(4) NC Projects

Radon Resistant Construction -221(d)(4)

- On March 28, 2017, Tom Bernaciak at HUD Headquarters provided an email with clarification on the Radon Report requirements for MAP 221(d)(4) New Construction Projects. Here are the major points of clarification:
 - The language in Section 9.5.C.2.a.i requiring a radon report at either the pre-application or the firm commitment application refers to reporting testing conclusions as part of a substantial rehabilitation or refinance application, not to new construction.
 - For new construction projects, a report by a radon professional is required only after testing has been conducted, at completion of construction and prior to final endorsement in accordance with Section 9.5.C of the MAP guide.
 - HUD will rely on the project Architect (who has E & O insurance) to incorporate any required radon resistant construction design or radon mitigation system(s) into the architectural plans.
 - HUD encourages the Architect to seek technical advice from a licensed radon professional should they believe it to be necessary in their professional judgment.

Radon Resistant Construction 221(d)(4)

□ Radon Zone 1:

- Must meet **ALL** of the requirements of ASTM E1465-08a for installation of passive mitigation systems.
 - Everything but the powered fan.

□ Radon Zones 2 and 3:

- Must meet the requirements of Sections 6.2-6.4 of ASTM E1465-08a
- Section 6.2 – Ground cover.
- Section 6.3 – Foundation walls.
- Section 6.4 – Gas permeable layer.

Radon Questions

Questions??