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Management Plan for Radon

JULY 2024

St. Michael-Albertville ISD #885

Management Plan for Radon

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Annual Review Form

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1.0 Introduction

Radon is a colorless, odorless, radioactive gas that occurs naturally in soil, rocks, underground water supplies, and in the ambient air that, according to the U.S. Environmental Protection Agency (EPA) and other scientific organizations, has been associated with an increased risk of developing lung cancer. Radon gas typically moves up through the ground into the air in buildings through sub-surface wall and/or floor cracks, floor drains, and construction joints and pipes. The water supply may also be a source of radon exposure.

St. Michael-Albertville ISD #885 conducts testing in district buildings to prevent occupants exposure to radon.

2.0 Responsibilities

The program administrator, or designee, is responsible for ensuring that testing is completed according to the *MN Radon Licensing Act* (MN Statute 144.4961), and ANSI/AARST MA-MFLB 2023 *'Protocol for Conducting Measurements of Radon and Radon Decay Products in Multifamily, Schools and Commercial and Multi-Use Buildings'* (ANSI/AARST MA-MFLB 2023). The following parameters are required to be followed by the entity that completes the testing:

- Radon testing and mitigation is conducted by licensed individuals.
- Testing and mitigation comply with applicable regulations, including the ANSI/AARST standards.
- Test all occupied and intended to be occupied rooms in contact with the ground, 10% of upper floor rooms, and other rooms specified in the ANSI/AARST standard.

According to Minnesota Statute 123B.571, school districts that receive health and safety revenue to conduct radon testing must conduct the testing according to the Minnesota Department of Health's (MDH) *Radon Testing in Minnesota Schools (4/08/2021)*. The program administrator, or designee, is responsible for ensuring that the following parameters are followed by the entity that completes the testing:

- Conduct testing between November 1st and March 31st
- Conduct testing with short-term test kits
- Conduct testing on school days or with HVAC operating under occupied conditions
- Conduct follow-up testing in rooms that have levels of radon greater than or equal to 4 picocuries per liter (pCi/L) and other rooms specified in the ANSI/AARST standard
- Mitigate occupied and intended to be occupied rooms that have levels of radon greater than or equal to 4 pCi/L
- Re-test the building after mitigation to verify radon reduction

The program administrator, or designee, is responsible for the following reporting per *Radon Testing in Minnesota Schools*:

- Report all radon test results to MDH on the 'School Radon Testing Form' at the conclusion of the testing project (after follow-up testing, mitigation and post-mitigation testing have been completed).
- Report radon test results at a school board meeting.

3.0 Testing Procedures

The EPA and the Minnesota Department of Health (MDH) advise school districts to test for radon every five years and after any renovation to the building or HVAC system, with the goal of reducing levels to below 4 picoCuries per Liter (pCi/L).

Initial measurements are collected under the following conditions, per ANSI/AARST MA-MFLB 2023, MDH *Radon Testing in Minnesota Schools* and Minnesota Statute 123B.571:

- Closed conditions (closed windows/doors except for normal exit/entry)
- With HVAC systems operating in a manner typical for normal occupancy
- Not during construction that includes structural changes to a building and/or the renovation or replacement of the HVAC system
- Not during unusually severe weather or periods of unusually high winds
- Minnesota licensed radon measurement professionals conduct radon testing using test devices from MN licensed radon analysis laboratories. Short term (72-96 hours) activated charcoal test kits are utilized for testing, on school days only (not holidays, vacations or weekends), between November 1st and March 31st on a five-year cycle.
- Radon Measurement licenses are required for school staff who complete the testing, unless the individual who completes the testing owns the building and is **not** compensated, and the District follows requirements of ANSI/AARST MA-MFLB 2023 for quality assurance measurements.

Sampling and analysis methodologies are provided within each report located in Appendix A. The District radon sampling schedule is located in Appendix C.

4.0 Mitigation

If the initial testing results indicate the radon level in a room is greater than or equal to 4 pCi/L, follow-up testing by a licensed professional is completed within one month of initial testing, in the same location, and under conditions similar to the initial measurements. Continuous radon monitor (CRM) measurements are utilized because they can determine if elevated levels are present during occupied times.

Rooms with elevated radon during occupied times are mitigated following ANSI/AARST MA-MFLB 2023. Radon can usually be reduced by adjusting the existing HVAC system, including increasing fresh air or balancing air flow to rooms, or by installing an active soil depressurization system.

Retesting by a licensed professional is conducted after mitigation or HVAC adjustments to verify that radon levels have been reduced.

5.0 Program Communication

Placement of radon measurement devices is communicated as required, to building occupants.

Associated testing documentation may be reviewed during normal business hours at the District Office. St. Michael-Albertville ISD #885 will consider other means of communication enhancement (such as posting results on our web page or school newsletter). Communication procedures will be approved by the superintendent.

Per Minnesota Statutes, Section 123B.571, St. Michael-Albertville ISD #885 reports radon testing results at a school board meeting and to the MDH. The MDH reporting form is provided in Appendix B.

6.0 References

American Association of Radon Scientists and Technologists. "Protocol for Conducting Measurements of Radon and Radon Decay Products in Multifamily, School, Commercial and Multi-Use Buildings." *American Association of Radon Scientists and Technologists, American National Standards Institute*. ANSI, AARST, 2023.

Minnesota Department of Health. "Radon Testing in Minnesota Schools." *Minnesota Department of Health, Indoor Air Unit*. MDH, 2021.

Minnesota Statutes. "Radon Testing (123B. 571)." *Minnesota Legislature, Office of the Revisor of Statutes*. MN Statutes, 2022.

Appendix A

Radon Testing Results and Locations

Appendix B

MDH Reporting Form

Appendix C

Radon Sampling Schedule