

Office of Radiological Health

RADON BULLETIN

ORH-752: Post Mitigation Radon Testing
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According to US Environmental Protection Agency (USEPA) guidance: “***Be aware that a potential conflict of interest exists if the same person performs the testing and installs the mitigation system***” (“Home Buyer’s and Seller’s Guide to Radon,” 1/2009, pg. 25). For this reason, USEPA, the Virginia Department of Health’s Division of Radiological Health (VDH-DRH), the National Radon Safety Board (NRSB) and the National Radon Proficiency Program (NRPP) all discourage this practice.

It is important to note that Virginia statutes require compliance with USEPA guidance. Specifically, **Virginia Code § 32.1-229.01.B** states:

“Any person conducting or offering to conduct radon screening, testing, or mitigation in the Commonwealth pursuant to subsection A, shall comply with (i) the radon testing standards outlined in the U.S. Environmental Protection Agency’s publication EPA 402-R-92-003, as revised, (ii) the radon mitigation standards outlined in the American Society for Testing and Materials (ASTM International) Standard, E-2121-13, as revised; or (iii) any other radon testing and mitigation standards deemed acceptable by virtue of reference by the Environmental Protection Agency or the Board.”

The current revision of ASTM E-2121-(13) Section 7.6.1 (pg. 9) reads in part: “Upon completion of radon mitigation work, the contractor shall take steps to ensure that the effectiveness of the radon reduction system is demonstrated using one of three approaches:

- 1) The contractor leaves an approved radon test kit with the person responsible for the building and instructs that person, in writing, that a radon test should be performed using the supplied radon test kit or any other approved radon test kit.
- 2) The contractor hires a certified and/or licensed independent radon tester to perform the required radon test or:
- 3) The contractor uses the test results, when available, from a relocation company that has arranged for post-mitigation testing...”

None of these options allow the mitigator to conduct the post-mitigation test.

Since EPA 402-R-92-003 has been discontinued and is no longer distributed by USEPA, then all sections of the most recent version of ASTM E2121 shall be interpreted as applicable to Virginia Code § 32.1-229.01.

Therefore, to be in compliance with Virginia law, radon mitigators should follow one of the three options for post mitigation testing as listed in ASTM E2121 section 7.6.1 as shown in options 1 through 3 above.
