

Harold P. Wimmer
National President and CEO

February 13, 2018

To: Senator Phillip Baruth, Chair, Senate Committee on Education
Senator Debbie Ingram, Clerk, Senate Committee on Education

From: Ted Marcy, MD, MPH, Chair, Policy Committee
Rebecca Ryan, Sr. Director, Health Education & Public Policy
American Lung Association in Vermont

Subj: S.279 Draft No. 1.2, Radon Testing in Schools

Thank you for thoughtful consideration to address testing and disclosing levels of radon in Vermont schools, and if needed, mitigating high levels. The American Lung Association, through research, education and policy, is working to defeat lung cancer, the leading cancer killer. As you know, radon exposure is the second leading cause of lung cancer and the *first* among non-smokers. This bill will *help* to raise awareness of the problem of radon and protect thousands of Vermont children and school employees.

We understand the concern about the costs associated with potential radon mitigation. However, the economic cost of possible mitigation should not outweigh the concern that Vermont school children and staff may be exposed to high levels of a known carcinogen. Vermont schools must provide a safe and healthy environment for staff and students.

The American Lung Association urges you to take action on S.279 and move the bill forward.

We have several recommendations for changes to the current draft of S.279:

§ 1792. MANDATORY RADON TESTING IN SCHOOLS:

(a) The requirement that the health department do the testing makes sense given schools do not want another unfunded mandate. However, the schools must be open to testing. Consider including language to *require* schools to request testing from the health department.

Increase the frequency of testing (lines 19-20): Illinois requires every five years and Oregon every 10 years. EPA recommends retesting “sometime in the future” if no mitigation is required after initial testing and after major renovations to the building or HVAC system. EPA Guidance on testing (page 9):

Vermont Office:
372 Hurricane Lane, Suite 101
Williston, VT 05495
Ph: 802-876-6860

Corporate Office:
55 West Wacker Drive, Suite 1150 | Chicago, IL 60601
Ph: 312-801-7630 F: 202-452-1805 info@Lung.org

https://www.epa.gov/sites/production/files/2014-08/documents/radon_measurement_in_schools.pdf

(b)(2) Add “and adults” after children (page 2, line 8). Many school staff spend decades working in the same building.

Sec.2. SCHOOL RADON MEDIATION STUDY COMMITTEE

(a) Add “and in the case that EPA funding is no longer available for testing.”

(b) Membership: Include a radon professional, such as a member of the American Association of Radon Scientists and Technologists (AARST). This professional could help committee members understand the technical aspects of radon testing and mitigation and associated costs.

Finally, we hope you’ll consider adding language to require schools under construction or renovation to use [radon resistant new construction guidelines](#) (RRNC). RRNC will save schools money compared to fixing a radon problem later on. Thank you for your consideration of these requests. If you have questions, please contact me at rebecca.ryan@lung.org or 802-876-6862.

