

HUD Radon Requirements: Handbook 423 I.2 Revisions

INTRODUCTION

The United States Department of Housing and Urban Development issued revisions on December 6, 2016 to [Handbook 4232.1](#), which details HUD Radon Requirements. The revisions will become effective starting Thursday, January 5, 2017, and will apply to new loan applications, all underwriter/lender approval requests, and other transactional requests for any existing Section 232 projects.

RADON TESTING REQUIREMENTS

Any applications received by HUD on or after January 5, 2017, for properties in all zones, will require radon sampling in accordance with the handbook. The radon testing program is similar to the Multifamily program, but with a few differences that include:

- There are no exceptions for properties in low radon zones (Zone 3) – testing is required
- Testing is required for transactions that include New Construction (post construction), Substantial Rehabilitation, and Refinance
- The AARST Large Building Standard is required to be followed instead of the Multifamily testing standard
- The Large Building Standard requires more substantial testing of non-residential areas
- Initial testing of 25% of all areas is permitted; however, if results are high (> 4.0pCi/L), 100% building mitigation or 100% follow up testing is required

LARGE BUILDING STANDARD

There are several significant differences between the Large Building Standard and the Multifamily standard that should be noted, including:

- Residential and Non-Residential testing are now combined into one group
- Unoccupied ground-contact rooms must be tested (for example - utility rooms, storage rooms, and maintenance rooms) if they could easily be converted for occupancy
- Duration for short-term tests are extended to 3 or 4 significantly occupied days
- Follow up testing will be more complex including a combination of standard canisters and electronic, hourly-monitoring equipment (Continuous Radon Monitors (CRM))
- CRM devices utilized for follow up testing to assess how radon levels differ between work hours and non-work hours (i.e. nights and weekends)

CONCLUSION

It is important to comply with the new radon testing requirements. We have been advised that exceptions will not be accommodated. Compliance with the new standard will mean:

- Radon testing in all zones
- More precise building information (floor plans) needed to determine radon pricing
- Revised price structure due to extensive non-residential area testing and extended (3-4 day) initial test duration
- More technically involved and strategically planned follow up testing



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As with each HUD technical guidance publication, there are technical details that could use clarification. Some are apparent immediately and others come to light upon practical application of the guidelines. We are presently corresponding with HUD for clarification on a couple technical points. This reflects broad guidelines that are not expected to be altered in any way. We will broadcast additional guidance if substantial clarifications are made.

If you have questions or would like to speak to a professional about how EBI Consulting can help you, please visit our website at www.ebiconsulting.com or contact Jesse Pasco, Senior Program Director, at jpasco@ebiconsulting.com or via phone at 717-542-9770.