Harmonization effort for SGM-SF, RMS-MF and RMS-LB Mitigation Standards

Continuous maintenance efforts to improve these standards are currently ongoing.

Read me

This proposed revised replacement for Section 9.1.3 is the result of public comments received in 2022 for proposed revisions to Section 9.1. While retaining the intent, clarity was added due to multiple unintended interpretations voiced by commenters. The proposed revision is applicable to the following ANSI/AARST publications:

- SGM-SF 2017 rev12/20
- RMS-MF 2018 rev12/20
- RMS-LB 2018 rev12/20

Latest published versions of those standards are available for comparison at www.standards.aarst.org where all ANSI/AARST standards can be found for review at no charge and for purchase.

The current mitigation standards committee roster (consensus body) can be linked to from www.standards.aarst.org/public-review. The current work project includes (1) harmonization, where possible, for all portions of these documents to read the same for the same tasks; (2) update based on new experiences, and (3) renderings that are more conductive to stakeholders who are involved in compliance assessment.

Public Review: SF-MF-LB Section 9.1.3 Update 6-22

COMMENT DEADLINE: August 8th, 2022

REQUESTED PROCESS AND FORM FOR FORMAL PUBLIC REVIEW COMMENTS

Submittals (MS Word preferred) may be attached by email to StandardsAssist@gmail.com

1) Do not submit marked-up or highlighted copies of the entire document.

2) If a new provision is proposed, text of the proposed provision must be submitted in writing. If modification of a provision is proposed, the proposed text must be submitted utilizing the strikeout/underline format.

3) For substantiating statements: Be brief. Provide abstract of lengthy substantiation. (If appropriate, full text may be enclosed for project committee reference.)
REQUESTED FORMAT

Title of Public Review Draft: SF-MF-LB Section 9.1.3 6-22

• Name: ____________________________  Affiliation: ____________________________

• Clause or Subclause: ____________________________

• Comment/Recommendation: ____________________________

• Substantiating Statements: ____________________________

• [___] Check here if your comment is supportive in nature and does not require substantive changes in the current proposal in order to resolve your comment.

Repeat the five bullet items above for each comment.

Requested registration of your contact information and copyright release.

<table>
<thead>
<tr>
<th>ONE TIME REGISTRATION CONTACT INFORMATION AND COPYRIGHT RELEASE</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOTE: AARST Consortium on National Radon Standards encourages original commentary on its standards. Commenters that choose to submit comments without an author’s signature (due to difficulties in timeliness, proximity or other) shall be deemed to have done so at their sole discretion and have thereby acknowledged and accepted the copyright release herein. If commenters submit comments authored by others, those comments must also be accompanied by a signed copyright release from the author of the original comment. The original comment author and representing commenters may be asked to engage in dialog supporting their position.</td>
</tr>
<tr>
<td>Name: ____________________________  Affiliation: ____________________________</td>
</tr>
<tr>
<td>Address: ____________________________  City: ____________________________  State: ____________________________  Zip: ____________________________</td>
</tr>
<tr>
<td>Telephone: ____________________________  Fax: ____________________________  E-mail: ____________________________</td>
</tr>
</tbody>
</table>

Copyright Release:
I hereby grant the AARST National Radon Standards Consortium the non-exclusive royalty rights, including non-exclusive royalty rights in copyright, in my proposals and I understand that I acquire no rights in publication of this standard in which my proposals in this or other similar analogous form is used. I hereby attest that I have the authority and am empowered to grant this copyright release.

Author's Signature: ____________________________________________  Date ____________________________

PLEASE SHIP TO: StandardsAssist@gmail.com Commenters are responsible for informing the standards assistant staff a when changing contact information or other preferences.

Notice regarding unresolved objections: While each committee seeks to resolve objections, please notify the committee responsible for an action or inaction if you desire to recirculate any unresolved objections to the committee for further consideration. Notice of right to appeal. (See Bylaws for the AARST Consortium on National Radon Standards - Operating Procedures for Appeals available at www.radonstandards.us, Standards Forum, Bylaws): (2.1) Persons or representatives who have materially affected interests and who have been or will be adversely affected by any substantive or procedural action or inaction by AARST Consortium on National Radon Standards committee(s), committee participant(s), or AARST have the right to appeal; (3.1) Appeals shall first be directed to the committee responsible for the action or inaction.
AARST Consortium on National Radon Standards
Website: [www.standards.aarst.org](http://www.standards.aarst.org)  Email: StandardsAssist@gmail.com
527 N Justice Street, Hendersonville, NC 28739

The Consortium Consensus Process
The consensus process developed for the AARST Consortium on National Radon Standards and as accredited to meet essential requirements for American National Standards by the American National Standards Institute (ANSI) has been applied throughout the process of approving this document.

Continuous Maintenance
This standard is under continuous maintenance by the AARST Consortium on National Radon Standards for which the Executive Stakeholder Committee has established a documented program for regular publication of addenda or revisions, including procedures for timely, documented, consensus action on requests for change to any part of the standard.
User Tools: User tools are posted online ([www.standards.aarst.org/public-review](http://www.standards.aarst.org/public-review)) as they become available (such as templates for field notices, inspection forms, interpretations and approved addenda updates across time).

Notices
Notice of right to appeal: Bylaws for the AARST Consortium on National Radon Standards are available at [www.standards.aarst.org/public-review](http://www.standards.aarst.org/public-review). Section 2.1 of Operating Procedures for Appeals (Appendix B) states, "Persons or representatives who have materially affected interests and who have been or will be adversely affected by any substantive or procedural action or inaction by AARST Consortium on National Radon Standards committee(s), committee participant(s), or AARST have the right to appeal; (3.1) Appeals shall first be directed to the committee responsible for the action or inaction."

Disclaimer: The AARST Consortium on National Radon Standards strives to provide accurate, complete and useful information. The AARST Consortium on National Radon Standards will make every effort to correct errors brought to its attention. However, neither the AARST Consortium on National Radon Standards, its sponsoring organization the American Association of Radon Scientists and Technologists nor any person contributing to the preparation of this document makes any warranty, express or implied, with respect to the usefulness or effectiveness of any information, method or process disclosed in this material. Nor does AARST or the AARST Consortium on National Radon Standards assume any liability for the use of, or for damages arising from the use of, any information, method or process disclosed in this document. It is the sole responsibility of radon practitioners using this standard to stay current with changes to the standard and to comply with local, state and federal codes and laws relating to their practice.
Rational/Commentary: This proposal addresses clarity for what is intended as the final step at the time of ASD system installation.

The risk of lung cancer does not stop at 4.0 pCi/l. The lower the radon levels can be reduced, the greater the risk reduction. A pressure measurement after the system is installed is the most direct feedback that the system is or is not functioning as intended. This post mitigation pressure check saves lives by letting the mitigator know if the system has treated the intended volume of soil gas and if that negative pressure is likely to be maintained when weather gets colder. Without this pressure measurement, the single radon test only defines the performance during the period of its measurement, but it does not provide any information of how the system could or should be further improved.

9.1 Functional Evaluations

9.1.3 ASD systems

Once all sealing, piping and other components of the ASD system are complete, evidence relative to system performance shall be sought as required in a), b) and c) of this Section 9.1.3.

a) Depressurization Performance

A minimum of one differential pressure measurement shall be made at a location distant from the suction point(s) with intent to evaluate if depressurization has been achieved within each targeted soil gas collection plenum. The term soil gas collection plenum shall include where subterranean pathways, such as voids or drain systems, are targeted as a primary source of soil gas entry.

The measurement shall be made using a differential pressure gauge that is capable of reading 1/1000 inch water column (.25 Pa) differences in air pressure. Jobsite log records of the event(s) shall include:

1. The outdoor temperature and building operating conditions, in accordance with requirements in Section 5; and
2. The measured air pressure within targeted soil gas collection plenum(s), relative to indoor air.

Exception 1: Where, as with stone walls, it is not physically possible to measure depressurization with a pressure gauge, evidence obtained and recorded in jobsite logs from smoke testing or other diagnostic tools or methods is permitted.

Exception 2: Where PFE test locations or test ports cannot be created due to building materials that are virtually irreplaceable, such as for historical preservation properties, or due to denied access to locations of interest, jobsite log records shall include:

a. the reason why, and
b. alternative locations or methods used to help verify depressurization effectiveness.

Informative note—Choices for actions based on results of this pressure measurement, which may include further investigations, are at the discretion of the system designer.