North Union CSD

Radon Plan and Test Schedule

Per Iowa Code Chapter 280.32 requirements



School Radon Training & Support System©

Created, facilitated, and supported by:

Energy Association of Iowa Schools

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Dedication

I wish Gail Orcutt were here to protest the attention of this dedication. I can hear her saying, "Julie, this isn't about me—it's about teaching people to prevent lung cancer in others."

But Gail isn't here. She died of radon-induced lung cancer in 2020. She never knew that, after ten years of sharing her story and lobbying, in 2022 the Iowa Legislature passed a law known in her honor as the Gail Orcutt School Radon Safety Act (originally HF 2412, now written into Iowa Code 280.32).

I met Gail after hearing her present at the 2016 EPA Region 7 Radon Stakeholders Meeting. As a retired 33-year Iowa teacher, Gail strongly supported the School Radon Training & Support System© (SRTSS) created and facilitated by my nonprofit organization, Energy Association of Iowa Schools (EAIS). SRTSS© would not be what it is today without her.

It is therefore with extreme gratitude that the EAIS staff, and Board of Directors, remember our friend and colleague, Gail Orcutt. We dedicate this plan to her memory. Because, as she always said, "Fixing radon is easy. Lung cancer is not."

Julie Weisshaar, executive director
Energy Association of Iowa Schools



Gail Orcutt, Iowa Teacher and Radon Warrior 1952 – 2020. *The day before her 57th birthday, never-smoker Gail Orcutt learned she had lung cancer.*

Assurances

The School Radon Training & Support System© (SRTSS), created and facilitated by Energy Association of Iowa Schools (EAIS), meets Iowa Code Chapter 280.32: Uniform School Requirements. It has been approved by the State of Iowa Health and Human Services department as a Radon Measurement Training Course for Iowa School District Employees, meeting the requirements of IAC 641-43.8 (136B, 280). SRTSS© is based on the measurement requirements as found in the ANSI/AARST MA-MFLB-2023, *Protocol for Conducting Measurements of Radon and Radon Decay Products in Multifamily, School, Commercial and Mixed-Use Buildings,* as amended to August 1, 2025. Its Iowa HHS Course Number is SCHT00002.

Acknowledgements

SRTSS© is a hybrid model created for school teams to learn how to accurately test their own buildings for radon, based upon EAIS experience, school district staff experience and input, and appropriate industry references.

We especially thank the following for their support and contributions: Tim Hood, Iowa school superintendent; Dr. Bill Field, University of Iowa College of Public Health; and Gail Orcutt, radon-induced lung cancer warrior. EAIS is also grateful to the Iowa Cancer Consortium and Iowa Department of Public Health for past grant funding.

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North Union CSD RADON TESTING & MITIGATION PLAN

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1. Introduction

Student learning and the safety of students, staff and community are priorities for North Union CSD. Our commitment to a quality learning environment includes the provision of radon testing in school buildings on a rotating calendar basis and fixing any elevations, if needed.

North Union CSD complies with all State of Iowa Code Chapter 280.32 Radon Testing and Mitigation requirements, including testing all attendance centers for radon at least once every five years. Short term radon tests are conducted by trained school district staff.

Why is radon testing and mitigation important? The United States Surgeon General issued a Health Advisory in 2005 that explained: "Radon is the second leading cause of lung cancer in the United States and breathing it over prolonged periods can present a significant health risk to families all over the country. *It's important to know that this threat is completely preventable*. Radon can be detected with a simple test and fixed through well-established venting techniques."

If radon test results in a **North Union CSD** building are at or above the EPA action level of 4 pCi/L, steps will be taken to correct the issue following the *School Radon Training & Support System© Flow Chart* (Appendix A).

This **North Union CSD** *Radon Plan and Test Schedule* shares our: 1) Plan for short-term radon testing at each attendance center under our control at least once by July 1, 2027, and at least once every five years thereafter 2) Schedule for short-term tests for radon at each attendance center 3) Testing results (also posted as required on the district's website) 4) Training completed to accurately and reliably measure radon levels in school buildings 5) Details on how a radon mitigation plan will be developed, if necessary, to decrease elevated radon levels to below 4 pCi/L

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2. School Radon Training & Support System©

This plan is part of the overall School Radon Training & Support System© (SRTSS) in which North Union CSD has chosen to participate. Energy Association of Iowa Schools (EAIS) created and facilitates the SRTSS©. This support system was created in 2015 and has continuously improved every year since, based upon the collaborative learning of EAIS and participating schools.

The SRTSS© provides us with continuous education and coaching, and gives us the tools and ongoing support we need to save budget dollars by doing our own short-term radon testing. It includes:

1. **Iowa school-specific training** during Kickoff workshops on how to accurately and reliably test our own buildings for radon. *(This Iowa School District Employee training is in no way meant to replace the specialized education required of radon experts who receive payment for testing as a profession.)*

2. This **personalized Radon Plan and Test Schedule.**

3. The **radon test kits** necessary for us to test our building(s) for the current year during the winter.

4. **Support from a real person** (our own radon rep) before, during, and after testing.

5. **Coaching on corrective measures and/or mitigation** for radon elevations, if needed.

6. Assistance with communications and **reporting to the public**, including a final report summary to post on our website as required.

7. Safe storage of our radon testing data.

8. Tracking our radon testing schedule, and **reminding us when it is time to test again** per our Radon Testing Rotation Calendar, and Iowa Code 280.32 requirements.

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3. Our Radon Plan at a Glance

With the help of EAIS and the SRTSS©, we have assigned roles and responsibilities for quality assurance, and strategically determined where and when to test for radon in our school district.

3.1 North Union CSD Radon Team + Questions/Inquiries

Questions regarding this School Radon Testing and Mitigation Plan may be directed to:

Administrative office address: 600 4th Ave, Armstrong, IA, 50514

School district phone: (712) 868-3542

Superintendent / District Spokesperson: Travis Schueller

Facilities Manager / Radon Test Coordinator: Mike Cummins

3.2 North Union CSD Buildings and Locations

Elem
308 310th Street
Fenton, IA 50539

HS
600 4th Ave
Armstrong, IA 50514

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3.3 North Union CSD Radon Testing Rotation Calendar

School Year	Buildings Scheduled
2025-2026	Elem - High School
2026-2027	NO TESTING NEEDED
2027-2028	, Mitigated Spaces - High School
2028-2029	NO TESTING NEEDED
2029-2030	Mitigated Spaces - Elem.
2030-2031	Elem - High School
2031-2032	NO Testing Needed
2032-2033	Mitigated Spaces - High School
2033-2034	No Tested Needed
2034-2035	Mitigated Spaces - Elementary

Note: Per Iowa Code Chapter 280.32 Iowa public school districts are required to test attendance centers every 5 years. National radon protocol dictates mitigated spaces be tested at 2-year intervals for a period of 8 years to ensure continued effectiveness.

Schedule is subject to change

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4. Radon Basics

4.1 What is Radon?

Radon is a naturally occurring radioactive gas that is colorless, odorless, and tasteless. It comes from the natural breakdown or decay of uranium, which is found in soil and rock all over the United States and the world.

Radon travels through the ground and into the air above, entering buildings through cracks and other holes in the foundation. If radon becomes trapped indoors, it can build up and become a health safety problem in buildings. Every building has the potential for unsafe levels of radon.

Radon gas breaks down into radioactive particles called radon decay products that can be breathed in, and become trapped in the lungs, releasing small bursts of radiation. This radiation may damage the body's DNA and lung tissue, and lead to an increased risk of lung cancer over the course of a person's lifetime.

The higher the level of radon and the longer the exposure, the greater the risk. **Because radon is colorless, odorless, and tasteless, the only way to know if it is present is to test.**

4.2 Health Effect: Lung Cancer

Radon is the leading cause of lung cancer among people who have never smoked, and the second leading cause of lung cancer overall after cigarette smoking. According to the U.S. Environmental Protection Agency, radon is responsible for about one in seven lung cancer deaths in the U.S., causing over 21,000 lung cancer deaths annually.

Scientists are certain that radon causes lung cancer due to decades of data from underground uranium miners who breathed high levels of radon on the job, and died from lung cancer at very high rates. Large pooled studies in North America and Europe confirmed that low-level, long-term exposure in regular homes creates the same cellular damage and cancer risk.

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The EPA classifies radon as a Group A: Known human carcinogen, which drives nationwide guidance and action thresholds. According to the EPA, the risk of lung cancer from radon exposure at the action level of 4 pCi/L compares to the risk of dying in a car crash. As the radon level increases, the risk increases.

Not everyone who breathes radon decay products will necessarily develop lung cancer. An individual's risk of getting lung cancer from radon depends on three factors: 1) Level of radon, 2) Duration of exposure, and 3) Other cancer risk factors, such as smoking combined with radon exposure (risk increases about 10 times).

Even with treatment, the survival rate of lung cancer is one of the lowest for those with cancer. From the time of diagnosis, only between 11 and 15 percent of those diagnosed will live beyond five years.

It is important to decrease exposure in homes and schools if elevated radon levels are found.

4.3 Action Level

The **EPA has established 4 picocuries per liter of air (pCi/L) as the United States "Action Level"** at which corrective measures and/or active radon mitigation should occur to bring elevated radon levels down.

Radon levels vary throughout each day, therefore protocol dictates using an average radon result to determine if mitigation is needed. If an initial radon test result is at or above 4 pCi/L, a second test should be done to determine the average radon result.

If the average of two radon test results is at or above 4 pCi/L, a licensed radon mitigator can work to reduce radon levels to as low as reasonably achievable.

Reducing levels to zero is likely impossible, as radon exists even in outdoor air at a level of about 0.4 pCi/L.

Any exposure to radon carries some risk, but the lower the exposure—in terms of time and concentration—the lower the risk.

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4.4 Radon in Iowa

The Environmental Protection Agency (EPA) has designated the **entire state of Iowa to be a High-risk Zone 1** for predicted average indoor radon levels greater than the action level of 4 pCi/L. Iowa has high radon levels due to prehistoric glacial activity that covered the area in uranium-rich bedrock and finely ground soil. Other states, primarily in the northern half of the U.S., are also designated as high risk for radon.

For most students and staff, the largest contributor to radon exposure is in the home. This is because people typically spend more time at home than anywhere else. In Iowa, it is estimated that as many as five in seven homes (71%) have radon levels above the action level. Parents and staff are encouraged to test their homes for radon and to take action to reduce elevated concentrations.

The second largest contributor to radon exposure for most students and staff is school. An EPA nationwide survey of radon levels in schools estimated that nearly one in five schools has at least one room with a short-term radon level above the action level of 4.0 pCi/L.

4.5 How Radon Gets Indoors

No matter how old or new, every building has the potential for elevated levels of radon. Radon moves from the soil below upward through cracks and other openings in the foundations of buildings. Indoor concentrations vary based on source strength, pathways, and soil permeability. Building pressure and ventilation also contribute to radon concentration variability.

Many school buildings are constructed on adjoining floor slabs, which permit radon to enter through construction and expansion joints between the slabs. Additional places radon can enter a building are cracks or penetrations in concrete, spaces around pipes, floor drains, sump pits, and hollow masonry walls. See *Figure 1: How Radon Enters a Building* on the next page.

Air pressure inside a building is sometimes lower than pressure in the soil under a foundation. Because of this difference in pressure, any building can act like a vacuum, drawing radon inside.

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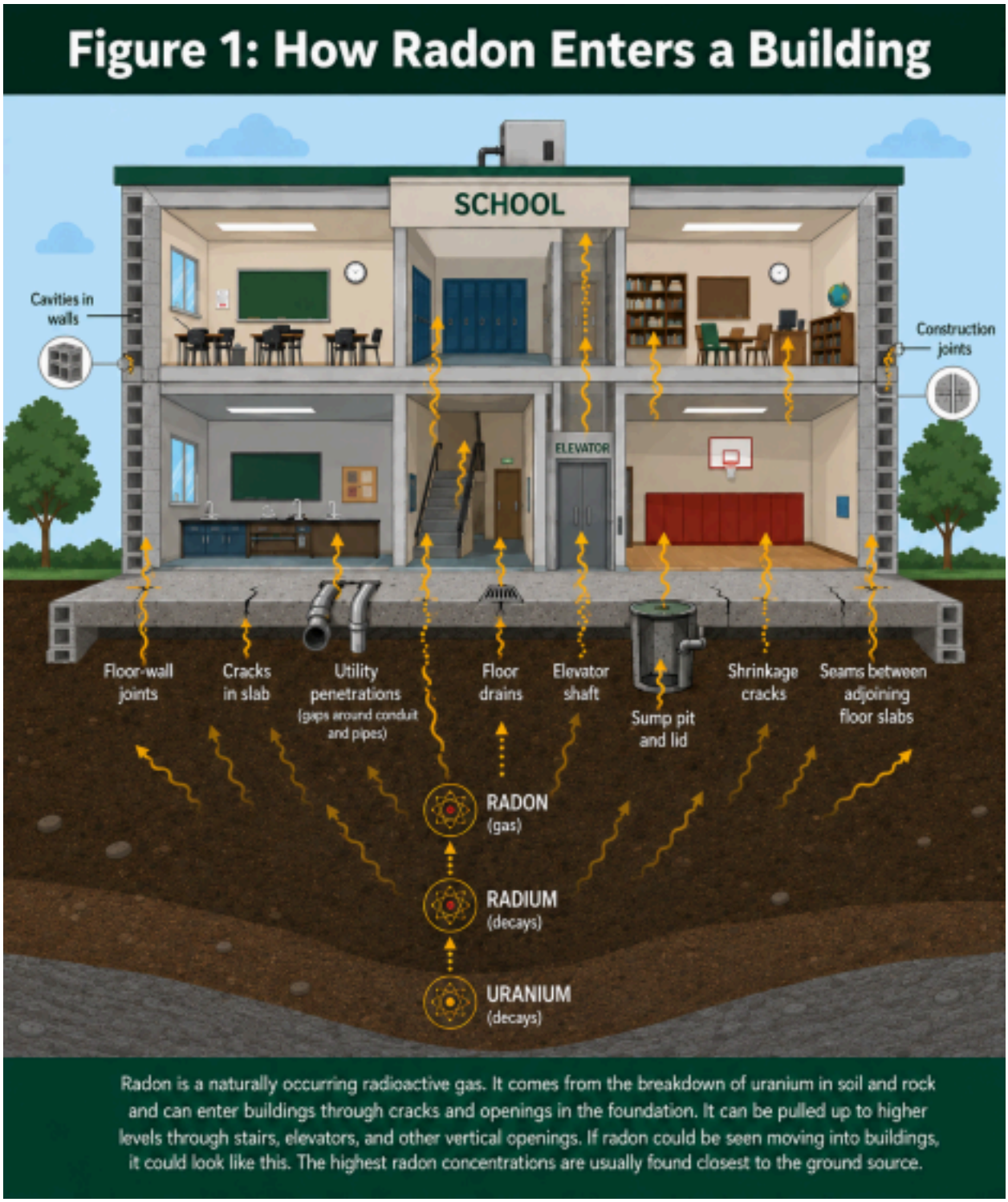

This figure was AI-generated with human EAIS staff guidance as a tool to visualize how radon can enter a building.

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4.6 Radon-Resistant Construction Techniques

Radon-resistant construction techniques are required for new school construction by Iowa Code Chapter 280.32. Radon resistant new construction (RRNC) includes sealing radon entry points and installing a vent pipe, but it does not include a fan. Instead, this passive radon system relies on the natural upward flow of air to exhaust radon through the pipe.

After construction is complete, if the school finds average radon elevations at or above 4 pCi/L, the radon system can then easily and affordably become an active system with the installation of a fan.

RRNC techniques vary for different foundations and building site requirements. The following are basic components in radon-resistant construction:

1. **Gas-Permeable Layer (Sub-Slab):** Four- to six-inch layer of clean, coarse gravel is placed beneath the slab to allow soil gas, including radon, to move more freely underneath a foundation so it can more easily and safely be vented outside above the building. Soil-gas collection mats or drainage mats can also be used.
2. **Vapor Barrier:** Plastic sheeting/soil gas retarder is placed on top of the gravel and vapor mat or perforated pipe to prevent soil gases from rising into the building.
3. **Radon Vent Pipes:** When the slab is poured, ports are stubbed in for vent pipes every 2,000 – 4,000 SF. Three-inch or four-inch diameter PVC radon pipes are routed vertically from the gravel layer ports up through the building's conditioned space and roof to safely vent radon and other gases outside above the building. Radon pipes are clearly labeled "Radon System" on the roof.
4. **Sealing and Caulking:** Every penetration through the concrete is checked and sealed tight (including the slab perimeter crack) with polyurethane caulk. Sump baskets must have a sealed cover. After the concrete cures and shrinks (typically waiting 30 to 60 days) the perimeter gap where the slab meets the foundation wall and any control joints should also be sealed to finalize the gas barrier.
5. **Electrical Junction Boxes:** Installed on the roof near vent pipes. This power supply will be ready to use if the passive radon system needs to be activated to power an Active Soil Depressurization/radon mitigation fan in the future.

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5. Testing for Radon

Iowa Code Chapter 280.32 *Radon testing and mitigation*, requires Iowa's public school districts to test attendance centers using short-term tests for radon gas every five years. The EAIS School Radon Training & Support System© (SRTSS) teaches our school district employees the proper radon protocols, and short-term test placements, that provide accurate and reliable radon results.

5.1 Our Short-Term Radon Test Kit

It is critical that all devices used for measuring radon in schools meet the EPA's Radon Measurement Proficiency Program (RMP) or State certification program requirements. SRTSS© teaches us to utilize short-term radon test kits from the Iowa-certified radon laboratory, Air Chek, Inc.

The test kit, itself, is not harmful in any way. It is an envelope containing a packet of activated charcoal. The kits are passive devices requiring no power to function.

For quality assurance, chain of custody protection, and data tracking purposes, short-term radon test kits are purchased by Energy Association of Iowa Schools, and provided to school districts participating in the SRTSS©

Figure 2. Air Chek Short-Term Radon Test Kit

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5.2 Who Does Our Radon Testing?

The school radon team members listed on Page 3 have received Certificates of Completion from the SRTSS©, and they accurately and reliably conduct our school district's radon testing.

Our school employees are already familiar with the layouts, construction types, and HVAC systems of our buildings, and are well qualified to conduct radon testing.

In Iowa public schools, district employees who have completed a school radon testing training program approved by the Department of Education and the Department of Health and Human Services may conduct radon testing for their employing school district.

The EAIS School Radon Training & Support System© (SRTSS) has been approved by the State of Iowa Department of Health and Human Services as a Radon Measurement Training Course for Iowa School District Employees, as it meets the requirements of IAC 641-43.8 (136B,280).

5.3 Which Buildings Are Tested?

Iowa Code Chapter 280.32 requires public school districts to test each attendance center under its control, which means we test every building that houses our students.

Our school district believes in providing safe work spaces for our staff, as well. Therefore, we also test the occupied spaces of our non-attendance buildings for radon.

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5.4 Which Spaces Do We Test?

All occupied spaces that are in contact with the ground are tested for radon. We also test occupied spaces that are not in contact with the ground, but are above unoccupied/untested spaces with ground contact, i.e. basements, crawl spaces, tunnels, and mechanical rooms.

Tested spaces include classrooms, break rooms, offices, gyms, auditoriums, and cafeterias. Per radon protocol, we do not test storage rooms, stairwells, rest rooms, utility closets, kitchens, elevator shafts, or hallways.

We also test spaces that are not currently occupied, but could be appropriate for occupancy in the future. This gives us the flexibility to relocate a classroom or office if necessary. These tests could also help with diagnostic testing if elevated levels of radon are found in other spaces close by.

All occupied spaces meeting requirements on the first floor are tested for radon, plus 10% of the occupied rooms on any second and/or third floors.

5.5 When We Test

It is important that we measure radon levels during normal, everyday use and activity while students and staff are in our buildings. This means we test for radon during occupied weekdays, under closed building conditions when heating, ventilation, and air conditioning (HVAC) systems are operating normally.

National protocol dictates that radon testing should be done during a building's normal operating conditions—which in Iowa's Climate Zones 5 and 6 means when the heating system is operating with no variance in outdoor air ventilation. We test for radon during the winter.

We do NOT test during:

1) Structural changes to a building and/or renovation or replacement of the HVAC system.
2) Major weather events such as *sustained* high winds (30 mph or more), excessive rain or snow, and/or 3/4-inch hail. Rapid changes in barometric pressure can affect radon levels and skew test results.

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5.6 Deploying and Retrieving Radon Test Kits

In order to gain accurate and reliable results, it is important that short-term radon test kits are correctly deployed and retrieved. Our school district's trained staff place test kits within the breathing zone (between 2 and 6 feet from the floor), avoiding areas of high heat, humidity, and air drafts.

Closed building conditions are maintained the entire time radon test kits are deployed. Test kits are not touched or disturbed in any way once they are deployed.

After being exposed for the SRTSS© *School Radon Test Week Timetable* of 96 hours, each kit is retrieved and sent to the lab for analysis.

5.7 Quality Control

For Quality Control purposes, the following is incorporated into our testing:

- 5% field blanks + 10% duplicates
- Closed building conditions
    - All windows and doors on all levels shut, except for normal entry/exit
- Open and routine communications
- Chain of Custody and Datalogs
    - Identifying who will be handling test kits and test data is an integral element to achieving quality results and preventing costly errors that could require retesting.

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6. Test Results

Once initial testing is completed and results are returned to us by Energy Association of Iowa Schools (EAIS), the *School Radon Training & Support System Flow Chart*© informs what needs to be done next for the safety of our students, staff, and community.

For any test result at or above the EPA's action level of 4.0 pCi/L, EAIS coaches us through the next steps of potential corrective measures and follow-up testing.

Iowa Code Chapter 280.32 requires public school districts to "publish testing results on the district's internet site in a timely manner." EAIS provides us with an official *School District Radon Testing Report* to post on our website.

7. Fixing Any Elevated Levels

Per Iowa Code Chapter 280.32, if averaged results of any first and second radon tests are at or above 4 pCi/L, we will employ an Iowa-licensed radon mitigator to develop a radon mitigation plan to bring our radon levels down.

If corrective measures are not found on site, an active radon mitigation system will be installed. This means one or more suction pipes will be inserted through the floor slab into the crushed rock or soil underneath, and vented out above the roof. The number and location of suction pipes needed depends on how easily air can move under the slab, and on the strength of the radon source.

A radon vent fan will then be connected to the suction pipes, and draw the radon gas from below the slab to be safely released into the outdoor air above the building.

If needed, an active radon mitigation system would allow radon to bypass our conditioned space without ever entering our building.

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8. Communication

Strong two-way communication enables accurate and reliable radon testing, as well as positive public relations, for our school district. Communication also minimizes misinformation, and reassures staff, students, and community.

Thanks to the guidance and templates provided by EAIS and the School Radon Training & Support System©, communication is easy, and occurs at all phases of our school radon testing.

Communication tools vary by audience, and include, but are not limited to:

1) Knowledge and tools for the superintendent/**district spokesperson** to be available and accessible to answer school radon testing questions from community and staff
2) Knowledge and tools for the facilities manager/**radon test coordinator** to be available and accessible to answer school radon testing questions from staff and students
3) Information for **building principals** and **district staff** about school radon testing and the importance of proper testing conditions, to also be shared as needed with **students**
4) Information for **school board members** and **parents** about school radon testing
5) Templates for communicating **radon test results** to staff, school board and parents after all phases of testing, and mitigation if needed, is complete 6) A **Final Radon Report** summary to be posted on our school district website 7) Information to encourage staff, school board and parents to test their own homes for radon

See sample talking points, news releases, memos, and poster behind the Action Plan/Communications tab of this plan.

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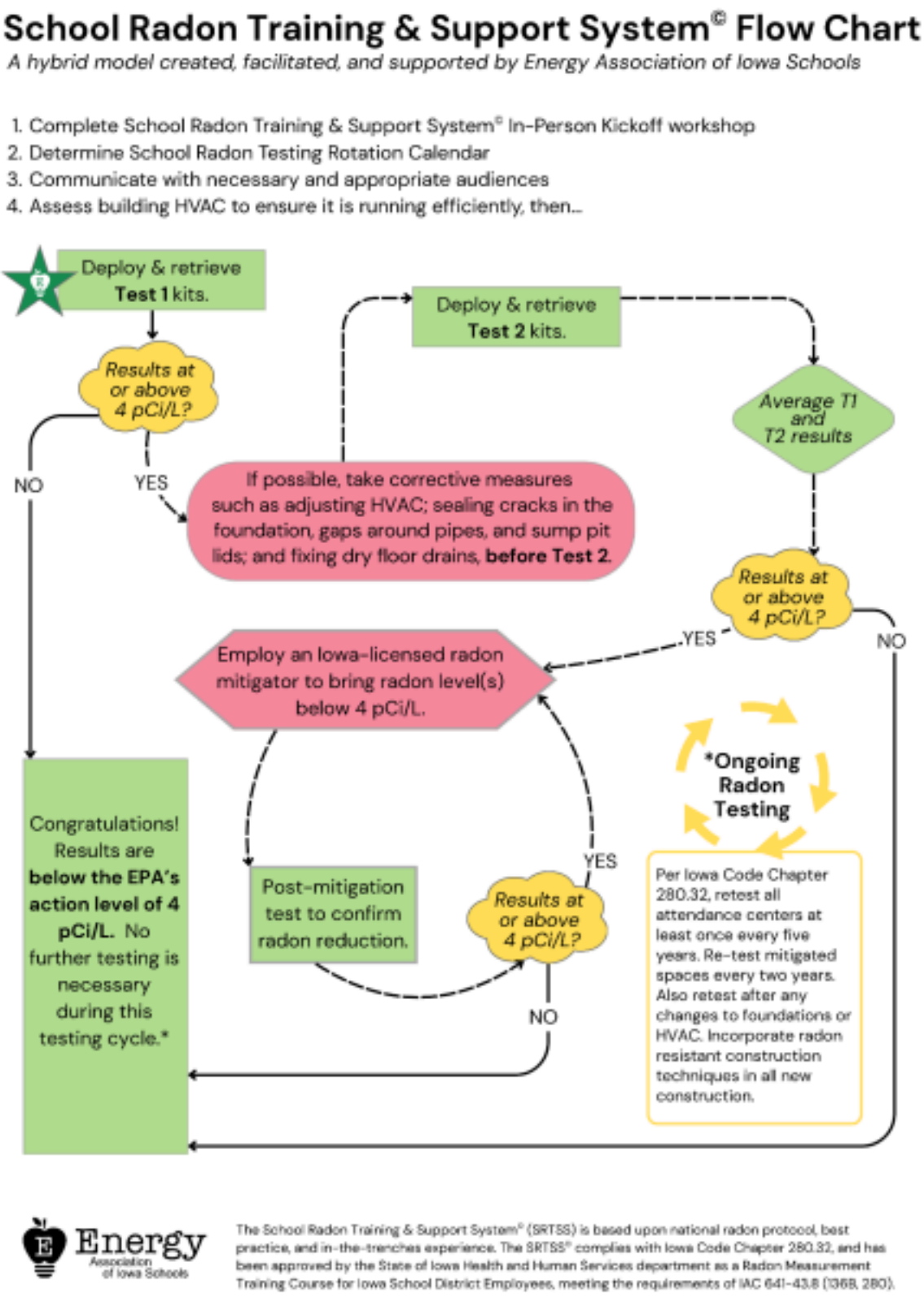
Appendix A: SRTSS© Flow Chart



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Appendix B: IA Code Ch. 280.32: Uniform School Requirements

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Appendix C: EAIS Training Approval Letter

STATE OF IOWA DEPARTMENT OF
Health AND Human
SERVICES

Kim Reynolds
GOVERNOR

Adam Gregg
LT. GOVERNOR

Kelly Garcia
DIRECTOR

July 7, 2023

Julie Weisshaar, Executive Director
Energy Association of Iowa Schools
1735 Kingfisher Ave
Creston IA 50801

RE: Approval of Radon Measurement Training Course for Iowa School District Employees

Dear Ms. Weisshaar

The agency has reviewed your application packet for offering the above referenced training course and find it meets the requirements of IAC 641-43.8(136B,280) and is therefore approved.

Course Name: School Radon Training & Support System

Iowa HHS Course Number: SCHT00002

The above course name and Iowa HHS course number shall be used when advertising this course and on the course completion certificate.

As a reminder, you are required to provide a course completion certificate that contains, at minimum, the following information; name of the student, the name of the course, Iowa HHS course ID number, name of the course provider, course date(s), number of hours, and the signature and typed name of the training provider(s).

This course availability will be posted on the agencies website and provided to the Iowa Department of Education for dissemination to Iowa school districts.

Please contact me if you have any questions or if you withdraw the availability of this course.

Sincerely,

Randall P. Lane

Randall P. Lane, Radon Program Coordinator
Bureau of Radiological Health
Division of Public Health
(515) 281-4928
randy.lane@idph.iowa.gov

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Notice to Participants – Disclaimer 1

Radon testing is the first step in knowing if radon mitigation is needed. This guidance does not cover specifics on how to reduce radon or actively mitigate radon in buildings that have elevated radon levels.

According to the EPA, radon can be reduced either by pressurizing and increasing ventilation in the building or venting radon from beneath the building's slab. The School Radon Training & Support System© can help put participating schools in contact with the Iowa-licensed professionals needed to assist with HVAC adjustments, foundation inspection and repair, and, if necessary, active mitigation systems.

Notice to Participants – Disclaimer 2

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