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17 October 2022

Dear Montgomery County Council,

My name is Lorin Stieff, and I am the Vice President of Rad Elec, a radon equipment manufacturer based in Frederick. We were founded in Maryland over 30 years ago, and in that time have become one of the major manufacturers for professional-grade radon detection equipment in the United States and around the world.

Rad Elec supports Bill 26-22, although with the following suggested amendments. We recommend that the acceptable mitigation threshold be increased from 2 pCi/L to 4 pCi/L, in order to align itself with the current EPA recommended action limit. In 1986, when the EPA defined this action limit, it recognized that the vast majority of homes can be reduced below this level in a financially feasible manner.

The same cannot always be said for reducing radon concentrations below 2 pCi/L, which may be cost-prohibitive for a sizable percentage of structures.

In rare circumstances it can even be difficult – and expensive – to mitigate below the 4 pCi/L action limit. In such scenarios, we suggest that the Council allow radon testers to measure – and mitigate – according to the structure's Working Levels. Historically, the EPA has defined this exposure limit at 0.02 WL (which is equivalent to 4 pCi/L at a 50% equilibrium ratio of radon gas to its decay products).

Whereas **picrocuries (pCi)** measure radon's rate of decay, **working levels (WL)** measure the concentration of radon's decay products, which are the radioactive elements formed from the decay of radon. This is important because the primary health risk comes not from radon itself, but rather from the radioactive decay of its solid progeny (which readily attach to lung tissue).

When a structure cannot be feasibly reduced below 4 pCi/L, allowing mitigators the option to lower the radon decay products below 0.02 WL will significantly reduce the health risk from ionizing radiation, and provide radon professionals with additional tools to increase public health and wellbeing.

Thank you for your time and consideration.

Best regards,

Lorin Stieff
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