

Good afternoon and thank you in advance for your time today. My name is Myca Bruno and I am the president of the North Carolina chapter of the Indoor Environment Association. I am here with fellow members and colleagues to represent the radon industry. I myself have over 18 years of experience with radon in some form or capacity, as well as being an environmental professional specialized in federal and state regulatory environmental compliance for low income housing funded by the US Department of Housing and Urban Development and various other agencies. My expertise includes regulations related to the national environmental policy act (NEPA), asbestos, lead based paint, and radon. My experience and expertise is extensive related to environmental regulatory compliance in all 50 states including radon. Due to my experience, I have the benefit of a very unique perspective. In my daily tasks, I wear the metaphorical hat of both regulator and salesperson. I'm responsible for ensuring we are able to make money as a business, as well as ensuring we are meeting compliance with any and all applicable regulations, which there are a great many.

All states have requirements for certification or licensing, as well as an established set of standards related to testing for and abatement of asbestos and lead based paint, including the state of North Carolina. Asbestos and lead-based paint are both considered health and safety hazards for humans if not tested for and handled properly by a qualified professional in that field. Radon is no different. I have personally been witness to an outrageous number of projects in NC where measurement was not completed properly or radon mitigation systems were installed improperly to the point of causing higher concern for the affected tenants. This is not only a hazard to tenant health but also a liability for property owners. We need regulation through certification in North Carolina, much like 20 other states that regulate radon services. I love this state and the people in it and believe our state should protect its residents from hazard and liabilities just as much or better as any other state in this country.

The EPA recognizes the ANSI-AARST standards as the standards for radon measurement and mitigation, which set forth a certain set of standards including criteria for national certification by programs like NRPP or NRSB to ensure qualified professionals are conducting radon related work. National certification programs determine what or who meet objective qualifications for measurement, mitigation, laboratories, as well as devices used for measurement.

I am asking that anyone claiming to be a professional in the radon field be held to the same standards and qualifications set forth by national certification. If any program wants to be listed by NC as equivalent to the national certifications then they should also be held to the same standards put forth by these national certifications, to ensure that North Carolina residents are properly protected from health hazards and associated liabilities as property and business owners. I implore you to be a part of setting a higher standard for our residents and helping us to push forward with regulation through certification in our state. Thank you for your time and consideration.

IEA PREAMBLE

The American Association of Radon Scientists and Technologists (AARST), known today as the Indoor Environments Association (IEA), is a nonprofit, professional organization of members who are dedicated to the highest standard of excellence and ethical performance of hazard identification and abatement of radon, chemical vapor intrusion, and other contaminants of concern in the built environment. The association primarily strives to advance the interests of its members through developing industry standards, certifying technical proficiency, enabling advancement of public policy, and communicating health risks to the public.

AARST/IEA owns the National Radon Proficiency Program (NRPP), which is one of two programs recognized by EPA for provision of certification credentials to radon measurement professionals and soil gas mitigators. As an independent administrative program of the association, the NRPP is governed by a Certification Council consisting of radon industry stakeholders who are responsible for credentialing policies and procedures. NRPP has been accredited under ISO/IEC 17024 by the American National Standards Institute's National Accreditation Board since June 2022 and has been approved by North Carolina Department of Health and Human Services (DHHS).