

Nova recommends that the materials be managed under an Asbestos O&M Plan.

#### 4.2.12 Radon

The U.S. EPA has prepared a map to assist national, state, and local organizations to target their resources and to implement radon-resistant building codes. The map divides the country into three Radon Zones, with Zone 1 being those areas with the average predicted indoor radon concentration in residential dwellings exceeding the EPA Action limit of 4.0 picoCuries per liter of air (pCi/L). It is important to note that the EPA has found homes with elevated levels of radon in all three zones, and the EPA recommends Property-specific testing in order to determine radon levels at a specific location. However, the map does give a valuable indication of the propensity of radon gas accumulation in structures.

Review of the EPA Map of Radon Zones places the Property in Zone 1, where average predicted radon levels are greater than 4.0 pCi/L.

On-site sampling to estimate the level of radon concentrations at the Property was conducted during the period from August 17, 2016 to August 19, 2016. A total of 13 charcoal canisters were placed in the facility. The locations and analytical results are tabulated below. The laboratory report is presented in Appendix E. The canisters were placed on August 17, 2016 and were retrieved on August 19, 2016. The canisters were returned to Accustar for analysis.

RADON SAMPLING RESULTS		AUGUST 17, 2016 TO AUGUST 19, 2016		
Sample No.	Building No. or Bldg. Address	Unit No.	pCi/L	Remarks
3067897	2	104	0.5	Below EPA Action Level
3067898	3	102	1.1	Below EPA Action Level
3067899	4	102	1.1	Below EPA Action Level
3067900	5	102	0.4	Below EPA Action Level
3067901	6	103	0.4	Below EPA Action Level
3067902	7	101	0.4	Below EPA Action Level
3067903	8	102	1.0	Below EPA Action Level
3067904	9	101	1.4	Below EPA Action Level
3067905	10	103	0.8	Below EPA Action Level
3067906	12	105	0.6	Below EPA Action Level
3067907	11	103	<0.4	Below EPA Action Level
3067908	13	104	0.9	Below EPA Action Level
3067909	14	102	1.1	Below EPA Action Level

The analytical data indicated that none of the samples exceeded 4.0 pCi/L, the EPA action level for radon in residential dwellings.