

2681

(717) 657-7032



TCS INDUSTRIES

RADON GAS DETECTION

4326 Crestview Road, Harrisburg, PA 17112

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

April 8, 2008

RECEIVED

APR 11 2008

Dear Environmental Board;

ENVIRONMENTAL QUALITY BOARD

As a radon measurement firm, we object to the large increases to the Radon Certification Fee schedule proposed in PA Bulletin, Vol. 38. NO. 11, dated March 15, 2008.

My company and I have been active in the field of radon measurements for over 22 years; longer than the PADEP's radon program. We consider the nature of our effort to be a significant public service. In central Pennsylvania many citizens are exposed to radon risks that exceed the maximum annual dose for occupational radiation exposure codified by the PADEP, OSHA and the USNRC. This statement is supported by measurements made by my firm and reported in the peer reviewed Health Physics Journal Vol. 80, Suppl 2, May 2001. It is fortunate for the Commonwealth that private firms are involved in radon safety or the state, morally, would have to provide the service at tax payers expense. I maintain that the Commonwealth should pay a stipend to every firm for all potential over limit exposures discovered to any of its citizens.

Some established private radon firms I have contacted consider the Pennsylvania radon industry to be marginal. In general four categories of radon companies live and or practice in Pennsylvania. They are:

A, Private home or building inspectors that provide radon surveys as an ancillary part of their service and compensation. These companies derive most income from building inspections which are generally performed without radon surveys. This category probably represent the largest number of practitioners. If this group were to terminate radon measurements only a relatively small annual reduction in earning would occur. Established inspection firms are probably the healthiest radon related economic group residing in Pennsylvania due to a second income stream..

B, Mitigators who derive all or most of their income from radon related services. The dollar value per mitigation is about an order of magnitude larger than the price for a real estate survey, and about 70 times larger than a typical laboratory analysis fee. Relatively few mitigations are needed for a annual profit. Additionally some mitigators also perform radon screening measurements.

C, Professional radon companies provide radon surveys, laboratory analysis, calibration services, and initial and continuing radon training to the all of the above. My firm and others of this category derive all income from these services. We gain our income almost entirely from

Pennsylvania sources. With time the number of Category A persons has reduced the radon screening component to a less than marginal economic value.

D, Firms that reside principally in other states and provide services limited to laboratory services, instrument sales, or calibration services. This category potentially sells services in all 50 States, most without having to support radon regulatory organizations or to utilize the services of certified Commonwealth firms.

As a initial radon measurement and continuing education trainer, I have trained over 100 PADEP certified radon measurement persons. Most were one person startup house inspection companies with limited finances; Category A persons. The proposed fee structure would be a hardship and work against attracting new workers to the radon measurement field. Category C listed above, would also be impacted by the proposed fee structure. I write from detailed knowledge as my firm is representative of this category. We derive our entire income from radon services. I believe this category represents a small number of radon certified individuals or firms, but it represents most of the experienced and highly trained professional radiation safety persons in Pennsylvania. Increasing fees will cause marginal firms to leave the radon business, or eliminate firm certification and other marginal classes of certification, and rely only on individual certification. The overall effect will reduce PADEP's projected income, and reduce overall quality.

To make the fee structure more equitable, I propose scaling the fee structure to net income level. New Jersey provides this type of fee structure. The means could be for a firm or individual to submit a current PA tax return along with an application for certification or renewal. If the PADEP radon certification administrator finds this task onerous, a review of the nature of his or her work load should be performed to determine what part could be eliminated.

As is common in firms experiencing increased costs and are not able to increase prices to compensate, staff reductions follow. The US auto industry is an example of an industry that cannot raise prices due to competition, and also can't tax to compensate. This is certainly true for Pennsylvania's private radon industry. Therefore a second possible solution is to perform a general review of the Radon Division's work load to determine if staff reductions can compensate for some or all of the fee increases.

Sincerely,



Carl Distenfeld, CHP, MS NuE, BS ChE