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Kathy Cooper

From: ecomment@pa.gov
Sent: Saturday, July 23, 2016 3:55 PM
To: Environment-Committee@pasenate.com; IRRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; gvitali@pahouse.net; regcomments@pa.gov; apankake@pasen.gov
Cc: ra-epmsdevelopment@pa.gov
Subject: Comment received - Proposed Rulemaking: Radiological Health and Radon Certification Fees; Pennsylvania Radon Mitigation System Tag and Fee



Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Radiological Health and Radon Certification Fees; Pennsylvania Radon Mitigation System Tag and Fee.

Commenter Information:

Raymond Fonos
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 IRRC
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Comments entered:

The proposed increase in fees is not in the best interest of the public. The present costs associated with operating a radon testing or mitigation business are already substantial. The registration costs imposed by the DEP are just a small component of those the local operators incur. We will have no choice but to pass the additional costs on to the consumer. Higher costs to the consumer will result in less radon tests performed.

Keep in mind that the majority of radon tests and mitigation systems installed are associated with a real estate transaction. In addition to all the costs incurred by the real estate buyer, they are also responsible for the costs of radon testing. Continued increases in cost will cause buyers already under significant financial pressure to reduce their costs by eliminating items that are not required. The elimination of the radon test will certainly be an area of opportunity to reduce costs.

Rather than simply deciding to raise fees to fund the department, it seems more reasonable for the department to take a close look at their own infrastructure costs and efficiency. The department would be well served to eliminate much of the self-crippling bureaucracy that they have created over the last few years. While the department certainly feels that their barrage of internal controls is protecting the consumer, I would argue that they are focused on things they think they can control rather than consumer protection. An example of questionable, time consuming controls is the requirement to obtain written permission to add or remove monitors from inventory. This process requires the testing individual to write a letter of request, send that letter to the DEP and wait for the DEP to respond just to add a monitor to our inventory. My last

request to add a monitor took weeks to process and multiple follow-up messages. At the same time the department also requires testing individuals to submit a list of all devices in inventory as part of the certification renewal process. One would think that the latter should be sufficient for the department.

It may be more appropriate for the department to consult with an unbiased resource to review all of the operational costs and processes to identify internal cost savings opportunities rather than placing the burden of inefficiency on the consumer. If the result of higher costs does in fact reduce the number of radon tests, who has the department protected?

These links provide access to the attachments provided as part of this comment.

One-page Summary: [DEP FEE SUMMARY.docx](#)

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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- The proposed increase in fees is not in the best interest of the public.
- We will have no choice but to pass the additional costs on to the consumer.
- Higher costs to the consumer will result in less radon tests performed.
- Continued increases in cost will cause buyers already under significant financial pressure to reduce their costs by eliminating items that are not required.
- It seems more reasonable for the department to take a close look at their own infrastructure costs and efficiency.
- The department would be well served to eliminate much of the self-crippling bureaucracy that they have created over the last few years.
- It may be more appropriate for the department to consult with an unbiased resource to review all of the operational costs and processes to identify internal cost savings opportunities.
- If the result of higher costs does in fact reduce the number of radon tests, who has the department protected?