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**Kathy Cooper**

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**From:** ecomment@pa.gov  
**Sent:** Monday, August 22, 2016 10:56 PM  
**To:** Environment-Committee@pasenate.com; IRRRC; 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:**

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**Comments entered:**

I am also not in favor of this rulemaking, like every single responder thus far. The report that initiated this proposed rulemaking stated that the Radiation Protection Fund is dwindling. That sounds like poor management to me and does not justify increasing fees. Our state has not been able to pass a budget on time in how many years? If I have \$100 to spend on groceries this week, I only spend \$100 or less. I don't spend more and then tell my boss I need a raise because I can't balance my checkbook. The board's rationale, in Section F of the rulemaking, that the proposed tag will help protect consumers is ludicrous. That's like saying every toilet installed by a plumber must have a state tag on it to make sure it's installed properly. The tag does nothing for the functionality of the radon mitigation system and it won't make a poorly installed system work better.

The board also stated that the additional fee is for outreach operations and public service announcements. I don't know anyone that listens to public service announcements and I've never heard one in regards to radon. There's this new thing called Google that everyone knows about and they can get all the information they desire about radon for free there.

The board also states that they want to encourage more radon mitigation systems to be installed in homes that need them. So they're approach to this is to make it harder and more expensive? I have been involved in radon measurement and mitigation now for about 6 years and the profit margins are already low. They get much lower and I'll be done giving hundreds of dollars to the state's DEP program every year for all the nonsensical continuing education we are forced to take that does nothing but cost us more money while making us regurgitate the same

information year after year. Radon hasn't changed since the dawn of time so making us spend our hard earned money to learn the same facts over and over again is ridiculous. This isn't protecting the consumer, it's raising the cost of his or her mitigation system or testing fees. If the program is truly looking for a way to increase available funds, try reducing waste. In order for the DEP to monitor all of licensed individuals and firms' continuing education, there must be countless man hours used and dollars spent. Since these continuing education courses offer us no new information, or should I say NEW & RELEVANT information, let's do away with this requirement and thus the associated costs with monitoring them. I understand and support the licensing requirement in order to protect consumers from less than reputable providers but the initial license should be sufficient. The audits are a joke as well that must cost an enormous amount of time and money to monitor and quite honestly are nothing more than a hurdle that requires me to cease operations for a day to gather all the required documentation to send to the state. Again, these do nothing to protect the consumer. All they accomplish is increase his or her bill at the end of the day which then decreases his or her desire to measure or mitigate radon. Yet the DEP says they're goal is to encourage people to measure and mitigate as necessary in order to protect them. This would also help the state with the concerns they list in Section G in regards to energy efficiency, and the efficient use of raw materials. I know how much electricity and paper I waste trying to fulfill all of the DEP's pointless requirements, I can't imagine it at the state level.

Finally, in Appendix A, the rulemaking states; "The report must identify any disparity between the amount of program income generated by the fees and the costs to administer these programs, and must contain recommendations for regulatory amendments to increase program fees." I think the previous statement says it all in regards to our government's fiscal mentality. Why must the report contain recommendations for amendments to increase fees? Why can't it contain recommendations for decreasing waste, streamlining the process, or any other option other than raising fees? Why must our government's knee jerk reaction to their own overspending always be an increase in the amount of money the taxpayer has to spend? Please do not add more fees onto the backs of the working people that are keeping this country running. Try taking away from the people that aren't contributing anything for once.

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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