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Kathy Cooper

From: ecomment@pa.gov
Sent: Tuesday, August 30, 2016 6:38 PM
To: Environment-Committee@pasenate.com; IIRC; 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:

Bruce Thomas
Home Inspector, Radon Tester (Bruce@a-ztech.us)
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Comments entered:

I have been a home inspector since 1989. Shortly thereafter I became certified to test for radon, literally from the beginning of certification requirements. We have built the business with the tagline of "One call does it all". Therefore we wanted to provide as many services to our clients as possible.

The letter from DEP prompted me to do an internal study and cost-benefit analysis of radon testing. What I discovered shocked me. At this point it costs our company \$66.83 for every test we do. In other words each and every test is a loss. We now charge what I feel is the maximum the public can bare. (we charge \$135.00 the cost is \$201.83 per test I did not include the time for QA and regulation interpretation etc.)

I will not repeat what everyone else has said, the same runs through each and every comment. I just know that personally I am far less inclined to vigorously promote radon testing as I have in the past. When I first started people didn't even know what radon was. I did because of my nuclear power plant experience. It was up to us as the service providers to promote ourselves and radon testing to each and every individual.

If you as DEP want us to continue to promote the vision of radon testing and consequently radon mitigation we need your help. As stated above every test I do costs me money we can't continue to do that very much longer.

You could help us by reducing confusing regulation. Promote an attitude of helping rather than

punishment. Ask us our opinion rather than just a board of people we have never heard of and do not do what we do for a living. Most of the professional commenters on this site would be more than willing to assist with clarifications and any questions that you may have about what it's really like to be a radon tester in the field.

Lastly Radioactive materials and radon testing and mitigation are two completely different things the only thing in common is that they're both radioactive. If you're going to put them together then each and every employee of the company who handles radioactive materials should be certified. Just like a radon tester has to be certified which on it's face is not possible.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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