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Kathy Cooper

From: ecomment@pa.gov
Sent: Monday, June 26, 2017 9:55 AM
To: Environment-Committee@pasenate.com; IRRRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; apankake@pasen.gov
Cc: ra-epmsdevelopment@pa.gov
Subject: Comment received - Proposed Rulemaking: Radiological Health



Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Radiological Health.

Commenter Information:

Bruce Thomas
Certified Radon Tester #1478 (bruce@a-ztech.us)
17 Fosterville Rd
Greensburg, PA 15601 US

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IRRC
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Comments entered:

240.102 ~ Proposed amendments codify the limit on number of testing firm employees to a maximum of five to ensure adequate responsible charge by the certified individual.~
-This section does exactly to opposite of it's intended purpose. By limiting the number of employees, if a company had enough work, the firm would have to be split and a second company would have to be established. This situation would create confusion between the two management teams. Employee testers (in the same company structure) would switch between companies and be unsure who their real supervisor is.
The clerical staff would be constantly confused which company they were working for and how to report to DEP and management. Confusion would be such that mistakes are inevitable.
- The number 5 is arbitrary and has no basis in real world company management. If the staff is properly trained and adequate levels of management exist, the number of employees is irrelevant.
If the staff and supervisors are not properly trained, the company will make mistakes there by providing poor customer service and losing both customers and money. The incentive is to automatically provide the best of customer service as well as accuracy and precision in all services provided.
The properly supervised number of employees has nothing to do with the intent of this change. In addition Service prices will have to be raised because of doubling company costs.

No attachments were included as part of this comment.

Please contact me if you have any questions.