3169.

The following comments are being submitted by Nancy Bredhoff, President, Radon Testing Corporation of America, Inc., 2 Hayes Street, Elmsford, NY. 10523. Tel # 914-345-3380; nbredhoff@rtca.com

I am submitting general comments because the numbering in the proposed regulation is confusing.

COMMENTS

Throughout the proposed radon regulation there is reference to reporting to the PA DEP Radon Section within five days. This should be amended to five business days.

If a firm has more than one certified individual (whether it be for a testing firm, a mitigation firm or a laboratory) and the certified individual responsible for the firm or laboratory employees can no longer serve in this capacity, then another certified individual in the same discipline should be allowed to be a replacement immediately without waiting for PA DEP approval. The PA DEP has already certified the individual for the particular discipline and the notification requirement to the PA DEP as written in the proposed regulation is unduly burdensome to operating a business.

I don't understand the requirement to have a serial number on the electret ion chamber. Is there that much variation between chambers that necessitates this labeling? I assume that this requirement is based on one brand of electrets.

I am confused by the sections on voltage drift for new batches of electrets. Is this testing to be done by the manufacturer or by the client buying electrets from the manufacturer? If this testing is to be done by the client, does the client have to wait to use the new batch of electrets until the voltage drifting testing has been completed? Are the limits on voltage drop for short term and long term electrets based on one manufacturer's product lines? I am confused as to how you correct for voltage drift if the voltage has drifted more than the prescribed limits. I am also concerned that the requirements for handling the electrets involve a lot of quality control and do not understand why analysis by electret ion chambers is exempt from laboratory certification.

The requirement for "...control and warning levels identified in...shall be adjusted when the RPE of at least 20 spike results has been calculated" may be too burdensome for many certified individual testers.

The requirement for annual calibration for AC, LS and AT is also unnecessary and burdensome to the laboratory. Calibration should be performed when there is a new batch of charcoal being used for production of AC or LS devices or a new batch of film/plastic being used for production of AT devices. All other QA measurements (daily calibration of analyzers, spikes, duplicates, blanks and proficiency tests) are satisfactory to ensure that the device calibration is in good working order.

I don't understand the requirement for laboratories to report the status of a radon mitigation system. This is burdensome for a laboratory and I suspect that many laboratories do not ask for this information from the consumer. It is difficult enough for a laboratory to get the consumer to report the measurement dates and test location information properly.