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Kathy Cooper

From: ecomment@pa.gov
Sent: Monday, March 26, 2018 11:26 AM
To: Environment-Committee@pasenate.com; IRRRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; apankake@pasen.gov
Cc: c-jflanaga@pa.gov
Subject: Comment received - Proposed Rulemaking: Administration of the Storage Tank and Spill Prevention Program



Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Administration of the Storage Tank and Spill Prevention Program.

Commenter Information:

Brian Dubas
Pine Run Construction (bdubas@pinerunconstruction.com)
4125 Landisville Road
Doylestown, PA 18902 US

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Comments entered:

1. The new UMI certification category is not necessary with the proposed decrease in activity requirements for UMX certification. Having only minor modification activity requirement is not nearly adequate. For example, a concrete finisher performing only concrete repairs on tank or island pads would qualify for activity as UMI certification without having any underground piping or equipment experience.
2. Having UMI qualify for IUM certification should not be permitted. It is extremely important that inspectors have installation knowledge and experience.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

Jessica Shirley
Director, Office of Policy
PA Department of Environmental Protection