

From: IRRC [mailto:irrc@irrc.state.pa.us]
Sent: Wednesday, August 24, 2016 9:53 AM
Subject: FW: Regulation #7-498: Radiological Health and Radon Certification Fees; Pennsylvania Radon Mitigation System Tag and Fee

Comment received by IRRC.

From: Rick Stump [mailto:rick@inspectnow.com]
Sent: Tuesday, August 23, 2016 4:50 PM
To: IRRC
Cc: rick@inspectnow.com
Subject: Regulation #7-498: Radiological Health and Radon Certification Fees; Pennsylvania Radon Mitigation System Tag and Fee

Thank you for considering my comments regarding the proposed fee increase.

Aside from a relatively small section of HUD multi-unit dwellings, the radon testing program in Pennsylvania is elective, meaning no one has to test for it. This being said, the number of tests that are performed is inversely related to the cost of the test. Raising fees for testers will eventually raise the price for the consumers and therefore there will be fewer tests. Until there is some form of mandatory testing for radon, as there is for most other forms of environmental pollutants, it endangers public health to raise the fees for testers and mitigators as this will result in fewer tests and fewer mitigations being performed.

Part of the use for the increased fees is stated to be for “continued outreach and public service announcements regarding indoor radon”. I would have to ask, does this include the free radon tests given to the public? If so, the “certification fees” charged by the department are being used to directly compete against testing companies like ours. This creates the perception that testing companies should be giving away the tests, and that we are overcharging for our services already. This would only be exacerbated by an increase in fees.

It would seem that the radon program in Pennsylvania is going the same direction that the USEPA Radon Measurement Program went in the past. The USEPA program became so bureaucratically expensive that when they wanted the radon testers to fund the program, it imploded and quickly disappeared.

It is important to understand that most, if not all, of the radon testing companies who place and retrieve devices are doing radon as an add-on service, representing only a very small part of their business. Nearly all of the tests are done as part of the home purchasing process. A potential buyer has to choose between Home Inspections, Drinking Water Tests, Well Inspections, Mold Testing, Septic System Inspections, Termite Inspections, Lead Paint Inspections and others. Radon testing is just one of the many possible tests and inspections, therefore, it is likely to be overlooked if the cost is too high.

P.S. Though it might not be immediately pertinent to this subject, I would ask the board members to inquire about what the radon levels are in the buildings they work in and when it was that they were last tested. Why are not all public buildings tested and the results clearly posted for everyone to see? If you are working in a radioactive environment shouldn't you be informed about it?

Richard Stump II
Suburban Property Inspections, Inc.
4600 Kutztown Road
Temple, PA 19560