

3138

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IRRC

Kathy Cooper

From: Michelle Elliott
Sent: Monday, March 28, 2016 9:01 AM
To: IRRC
Subject: FW: EQB proposed regulation #7-522 (IRRC #3138): "Handling and Use of Explosives"

2016 MAR 28 AM 9:04

From: Elam M. Herr [<mailto:eherr@psats.org>]
Sent: Friday, March 25, 2016 9:38 AM
To: Michelle Elliott
Subject: RE: EQB proposed regulation #7-522 (IRRC #3138): "Handling and Use of Explosives"

Michelle: We have reviewed the EQB's proposed regulation #7-522 (IRRC # 3138) pertaining to "Handling and Use of Explosives." Although we may agree with the department in that this regulation should have a minimal impact on local governments since it is to address the "use of explosives for seismic exploration in construction blasting and blasting for mining operation," it does affect those municipalities that have a bomb squad. The explanation provided to IRRC states that "a few municipalities with bomb squads that are licensed to store explosives" would be covered by these regulations, and would have to follow the same procedures as outlined in the proposed regulations. These same municipalities would be responsible for the increased, although minimal, fee for an activity that provides for the removal of explosives that could be harmful to the public. We would contend that under the proposed regulations there is no difference between a license for the use of explosives for construction or mining blasting and one for detonation of an explosive for safety purposes. We maintain that municipal bomb squad personnel should be properly licensed, yet their activities are different from construction and mining operations, and should not be regulated in the same matter.

I hope this helps in your review. If we can be of further assistance, please contact me. Elam

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