



ORIGINAL: 2532

June 9, 2006

Environmental Quality Board
PO Box 8477
Harrisburg, PA 17105-8477

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2006 JUN 28 AM 9:33
INDEPENDENT REGULATORY
REVIEW COMMISSION

Re: **Proposed Rulemaking**
25 PA Code Chapter 245

Dear Sirs:

Listed below are our comments to the proposed amendments to 25 PA Code Chapter 245:

- 245.113(a)
IUM
IAM
Requirements for 20 activities should be maintained for all Experience and Qualifications alternatives. As proposed, no activity experience will be necessary for certification. Significant field experience is necessary for inspector qualifications.

- 245.132(c)
AMNX
Twelve (12) activities are difficult to achieve. Very few non-metallic tanks are installed or modified. Should be changed to 6.

- 245.543(c)
Requires clarification. Is testing requirement at the next In-Service or Out of Service Inspection?

Thank you for your consideration.

Sincerely,

Gregory E. Dubas
President

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ENVIRONMENTAL QUALITY BOARD

