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ORIGINAL: 2532

From: Mark Onesky [monesky@oneskyengineering.com]

Sent: Thursday, June 15, 2006 6:34 PM

To: RegComments@state.pa.us

Subject: Proposed Rulemaking Administration of the Storage Tank and Spill Prevention Act

To whom it may concern,

I offer my strong objection to the proposed rulemaking at 25 PA Code Chapter 245.444 Methods of release detection for tanks. Specifically, the requirement that the evaluation of the site and the attendant report authentication must be performed by a professional geologist is inappropriate as no geologic interpretation is being performed. Moreover, this requirement unfairly restricts many professional engineers in civil, environmental, geotechnical, and groundwater engineering disciplines from performing work within their area of professional expertise. The routine location of release detection wells is typically governed by site constraints and conditions. Bedrock geology does not affect the location as most wells are located within overburden material, fill material, previous tank excavations, or in rock excavations that are ripped or blasted. Suggesting that the location of release detection points constitutes geologic interpretation that may only be assessed and certified by a professional geologist also unnecessarily increases the cost of storage tank installations. As a minimum, the language should be expanded to allow the evaluation and certification to also be performed by a professional engineer. Limiting the evaluation and certification to professional geologists is an unwarranted proposal that will be challenged.

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