

From: Vawser, John C.
To: [commentletters](#)
Subject: Comment Letter - Proposed Underground Storage Tank Regulations
Date: Tuesday, March 27, 2018 8:04:16 AM



Comment regarding paragraph 2716(a) which changes the requirement for visual inspections by the Designated UST Operator from monthly to every 30 days.

This change causes us to conduct 13 inspections per year in lieu of 12. When you lay out an inspection schedule on a calendar and move each 30-day inspection forward when it lands on a holiday or weekend to avoid being late, you will always end up with 13 inspections versus 12. Is that your intention? I read the rationale for the change and thought you were hoping to achieve the opposite effect.

We will have to conduct an extra inspection each year and the taxpayer will foot the bill since we conduct these DUSTO visual inspections at eleven CA sites for the DoD. Please advise if you have further questions.

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