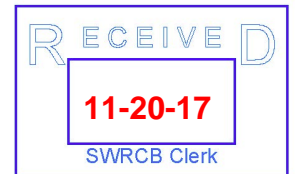


From: [Bob Borges](#)
To: [commentletters](#)
Subject: Comment Letter - Proposed UST Regulations
Date: Monday, November 20, 2017 11:00:49 AM
Attachments: [image006.png](#)



Ms. Jeanine Townsend,

I am writing to comment on the proposed UST regulations. During my review of the proposed regulations I question allowing testing of UST secondary containment to occur “within 30 days of the date of the completion of a repair” as found in 2637.1(a)(2) and similar language found in 2637(a)(1) (B). Based on my interpretation of this text, the testing of the secondary containment container or system is not require prior to placing the system back in service but must be completed within 30 days of the completion of the repair? If this is the case I don’t agree with this and strongly believe any repairs to the secondary containment shall be tested prior to placing the system back in service. I have personally seen repair work fail during testing and feel this is a monumental mistake allowing the system to operate for up to 30 days without testing. If you have any questions, please let me know.

Thanks,

Bob Borges, Captain

CUPA Inspector

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