

Comments on Proposed Rules
for Chapter 25

RM 201800005

Comments offered by:
Alex Ralston
Petcon, Inc.

FILED
NOV 26 2018

COURT CLERK'S OFFICE - OKC
CORPORATION COMMISSION
OF OKLAHOMA

1. **165-25-1-101 Licensing procedure for UST Installers**

(a)(5) Installers must also certify that they will comply with all Commission rules and requirements for underground storage tanks, applicable Occupational Safety and Health Administration (OSHA) 29 CFR 1910.120 Hazardous Waste Operations and Emergency Response (HAZWOPER) standards.

This proposal included UST Installer, UST Removers and Aboveground Storage Tank licensees. My comments apply to all three licensees.

In addition to my previous comments on this proposal, I recently became aware of another issue.

The OCC will not approve OSHA HAZWOPER courses for continuing education. This proposal by the OCC, requires that the licensee must certify that they will comply with the OSHA Hazwoper standards. Most licensees are not aware of all of the HAZWOPER standards How can the OCC require that an individual certify that they will comply with all HAZWOPER rules when they refuse to accept courses that are specifically designed to inform licensees what the HAZWOPER rules are?

My comments on this proposal are the following:

1. Withdraw this proposal because the OCC will not approve courses designed to inform licensees what these rules are or;
2. Approved course for continuing education that will allow licensees the means to find out what these rules are.