

Pfeiffer, Nadine

From: troy@royconsultinggroup.com
Sent: Wednesday, October 09, 2019 8:22 PM
To: Rulescoordinator, Dhsr; Crowley, David P
Subject: [External] Proposed Readoption of Radiation Protection Rules - 10A NCAC 15

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Roy Consulting Group Corporation is a small, women-owned, environmental consulting business located in Charlotte, NC and founded in 2004. We own one XRF machine which we use for testing lead-based paint. The radiation source in the XRF is CO57 at 444 Bmq (a very miniscule quantity of radiation). Our radioactive material license fees from 2004 to present are as follows:

2004 to 2007 was \$160/year
2008 to 2010 was \$250/year
2011 to 2018 was \$425/year
2019 was \$1,860/year (almost a 440% increase from last year!)

For comparison purposes, our South Carolina radioactive material license fee has been \$338/year from 2006 to the present.

The fee we were forced to pay this year is exorbitant for one XRF machine. The \$1,860 fee equates to over \$7 per working day as compared to a little over \$1.50 per working day we paid in 2018. This fee may be more easily absorbed for larger companies that own numerous XRF machines, nuclear gauges, moisture gauges and density gauges. However, for the many smaller firms in North Carolina with one gauge, this exorbitant fee greatly impacts our ability to provide lead-testing services to families in low-income housing.

We request that you add an additional line item to the fee schedule for companies that only own XRF machines.

-consultants – XRF machines ONLY \$475

Thank you for your consideration of small-business owners impacted by this dramatic increase.

Patricia Roy
Roy Consulting Group Corporation
9823 Balmoral Circle
Charlotte, North Carolina 28210
704.968.4111
Fax 704.553.9458
www.royconsultinggroup.com

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