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PENNSYLVANIA STATE ASSOCIATION OF TOWNSHIP SUPERVISORS

INDEPENDENT REGULATORY
REVIEW COMMISSION

January 17, 2007

Mr. William T. Phillipy, IV, Secretary
Environmental Quality Board
P. O. Box 8477
Harrisburg, PA 17105-8477

Dear Mr. Phillipy:

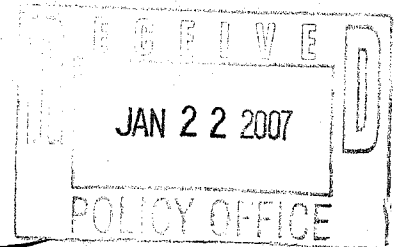
We have reviewed the proposed rulemaking 7-406 (IRRC # 2587) pertaining to the notification of airports when a solid waste or transfer station is proposed or expanded. And although we do not have any problems with the inclusion of military airports in the notification process for a proposed or expanded landfill, we do question the rationale for notification of any airport if the proposed or expansion of a transfer station is totally enclosed. We would contend that there is a difference between an open-air and an enclosed facility. As such we would recommend that the regulations be amended to separate open-air transfer facilities from totally enclosed transfer facilities.

One other issue we would also like to raise is the question of whether a recycling center would fall under this regulation. Since most municipal recycling centers are areas where recyclable material is sorted and transferred to other vehicles, could one argue that it is a transfer station and needs to comply with the proposed regulations?

We appreciate your concerns and look forward to your response.

Sincerely,

Elam M. Herr
Assistant Executive Director



EMH: jac

cc: Mr. Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission

