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From: Art Hall [Art.Hall@wheatland.com]
Sent: Monday, December 14, 2009 12:06 PM
To: 'RegComments@dep.state.pa.us'
Cc: IRRC
Subject: Comment on proposed "Air Quality Fee Schedule" regulations

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Gentlemen:

While it is appropriate for the Department to charge fees commensurate with its review and processing expenses, the proposed fee schedules are extreme considering that there is no justification in terms of man-hour requirements associated with these fees.

For instance, under section 127.702 (j), the Department proposes an initial fee of \$400 if an owner/operator submits a Request for Determination as to whether or not a Plan Approval is required. This was intended to be, and for the most part is, a simple straightforward process, especially since it can be handled online. It seems unreasonable to charge \$400 for one or two hours of Department staff time.

If the Department insists on charging a fee, then it should impose a deadline for its response. I recently submitted such a request and had to wait five weeks before the Department reviewer contacted me with a question which I responded to the next day. I then had to wait another week before I received the official response requiring a Plan Approval. During this period, I lost valuable time that could have been spent on the Plan Approval application review.

Arthur E. Hall, P.E.
Director, Environmental Affairs
Wheatland Tube Co.
One Council Avenue
Wheatland, PA 16161