

WEBSITE: ww.senatorrafferty.com January 22, 2010

ADVISORY COUNCIL FOR THE SOUTHEASTERN

AND DELINQUENCY

TARGETED COMMUNITY REVITALIZATION AND CRIME PREVENTION ADVISORY COMMITTEE

STATE TRANSPORTATION COMMISSION

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Honorable John Hanger, Chairperson **Environmental Ouality Board** 16th Floor, Rachel Carson State Office Building 400 Market Street Harrisburg, PA 17101-2301

Dear Secretary Hanger:

On behalf of the East Norriton, Plymouth, and Whitpain Joint Sewer Authority, I would like to submit the enclosed letter regarding the proposed revisions to Chapter 92, and hope that you will include this letter as part of the public comment period.

The proposed regulations would dramatically increase the permitting fees for wastewater treatment facilities, shifting the taxpayer burden from the state to the municipalities and authorities.

I respectfully request your review of the enclosed letter and ask that you keep these comments in mind during the regulatory process. Thank you. As always, I remain

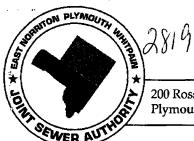
Very Truly Yours, John C. Rafferty, Jr.



DEPARTMENT OF ENVIRONMENTAL PROTECTION

JCR/sgm

cc: Timothy Boyd, JSA



## East Norriton **\*** Plymouth **\*** Whitpain Joint Sewer Authority

200 Ross Street Plymouth Meeting, Pennsylvania 19462

## (610) 279-5759 Fax (610) 279-8033

January 14, 2010

State Senator Daylin Leach 601 S. Henderson Road, Suite 208 King of Prussia, PA 19406

State Rep. Kate Harper 1515 DeKalb Pike, Suite 106 Blue Bell, PA 19422 State Senator John C. Rafferty 3770 Ridge Pike Collegeville, PA 19426

State Rep. Matthew Bradford 1846 Markley Street Norristown, PA 19401-2904 State Rep. Michael Gerber 527 Fayette Street Conshohocken, PA 19428

## Re: Proposed DEP Chapter 92 Regulations

Dear Lady and Gentlemen:

I am writing to you on an issue of importance to the JSA regarding DEP's proposed revisions to Chapter 92, National Pollutant Discharge Elimination System Permitting, Monitoring And Compliance.

The proposed regulations include a substantial increase in permitting fees for wastewater treatment facilities, such as ours. Under the proposed regulations, our previous \$500 permit fee will rise to \$5,000. In addition, for the first time, an annual fee of \$2,500 for each of the four remaining permit years will be imposed.

While the JSA appreciates the current fiscal conditions in Harrisburg, especially as it relates to DEP, we believe the continued increase and expansion of fees merely shifts the taxpayer burden from the state to municipalities and authorities.

Anything you can do to mitigate this type of cost shifting is greatly appreciated.

Please feel free to contact me at (610) 279-5759 or director@enpwjsa.org if I can provide any additional information.

Sincerely, see a second

Timothy A. Boyd, P.E.

C: ENPWJSA Board

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Protecting our environment since 1959