2819 The Saxonburg Area Authority

420 West Main Street Saxonburg, PA 16056 (724) 352-1400

March 12, 2010

Environmental Quality Board P.O. Box 8467 Rachel Carson State Office Building Harrisburg, PA 17105-8467



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INDEPENDENT REGULATORY REVIEW COMMISSION

[Sent via electronic mail to regcomments@state.pa.us]

The Saxonburg Area Authority would like to provide comments to the proposed rulemaking for the proposed regulation 25 PA Code, Chapter 92a, relating to National Pollutant Discharge Elimination System (NPDES) Permitting, Monitoring and Compliance, that was published in the February13, 2010 PA Bulletin.

Application fees and Annual fees 92a.28 and 92a.62 - We feel that the reissuance fees and annual fees are not reasonable. Reasonable fees should help offset the cost of permit re-issuance review services only. Point discharge sources and local regionalization projects assist the Department in minimizing its operating costs, by monitoring fewer discharges. We feel the sliding scale is counterintuitive to the actual costs the Department would incur without consolidated these discharges. Please consider offsetting the costs with general fund revenues, since Pennsylvania tax payers are the primary beneficiaries of this program and there is no reason why this program should not continue to be substantially supported by general fund revenues.

Furthermore, annual fees do not include permitting and we question if this fee is authorized to assist in offsetting the cost of monitoring, compliance evaluation, administration and training and enforcement activities associated with the NPDES program.

Thank you for the opportunity to comment. Should you have any questions, please contact our office at 724-352-1400 ext. 228.

Sincerely,

Saxonburg Area Authority

Paul J. Cornetti, P.E. Authority Manager

2819

From:

Paul Cornetti [pcornetti@SaxonburgPA.com]

Sent:

Friday, March 12, 2010 3:20 PM

To:

EP. ReaComments

Subject:

Proposed Regulation 25 PA Code, Chapter 92a

Attachments:

NPDES Comment Letter 3-12-10.pdf

Attached, please find a copy of our comments related to the proposed regulation 25 PA Code, Chapter 92a, relating to National Pollutant Discharge Elimination System (NPDES) Permitting, Monitoring and Compliance, that was published in the February 13, 2010 PA Bulletin. We would appreciate your consideration of our comments.

Thank you,

Paul J. Cornetti, P.E. Saxonburg Area Authority Manager 420 W. Main Street Saxonburg, PA 16056 Phone: 724.352.1400 (ext 228)

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Email: pcornetti@saxonburgpa.com



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