



Institute of
Scrap Recycling
Industries, Inc.



May 03, 2021

RE: Regulation #7-533: Water Quality Management and National Pollution Discharge Elimination System Permit Application and Annual Fees

Dear IRRC Members,

On behalf of the Institute of Scrap Recycling Industries' (ISRI) Mid-Atlantic and Pittsburgh chapters we are writing to oppose the proposed rulemaking amending Chapters 91 and 92a to establish new fee schedules for Water Quality Management (WQM) permit applications, National Pollutant Discharge Elimination System (NPDES) permit applications and NPDES annual fees, and to make clarifications in 25 Pa. Code § 91.1, 91.22, 91.27, 91.361 91.52, 92a.26, 92a.32 and 92a.62, respectively. We request that you oppose Regulation #7-533, which is scheduled for consideration on May 20, 2021.

ISRI is a trade association representing both small and large scale scrap recycling businesses worldwide. Many of our members are small family-owned businesses employing more than 7,000 Pennsylvanians across the Commonwealth. Since the early 1990s, the recycling industry has been subject to environmental permitting for discharges of industrial storm water. Storm water permit fees are proposed to increase from \$500 per facility each year to \$1,500 per facility each year. Previously, the fees associated with this permit were assessed every 5 years at a lesser rate of \$750. The proposed rulemaking establishing a new fee schedule for WQM permits would place a tremendous burden on our small businesses, and jeopardize employment for Pennsylvanians who contribute positively to the environment and U.S. manufacturing. In fact, more than 70 percent of the scrap processed in the U.S. is used in domestic manufacturing, which continues to prop up not only our industry, but also industries within the Commonwealth.

In addition, ISRI members are expected to adhere to other Department of Environmental Protection requirements, such as semi-annual storm water testing and comprehensive reporting, which costs members thousands of dollars a year. While we agree that the Department of Environmental Protection should continue to maintain adequate funding for environmental compliance monitoring, increasing the financial strain on Pennsylvania's small businesses is not reasonable and not the way to generate needed funds. The increases in fees are punitive and will detrimentally impact an industry looking to foster improvements to the environment.

We strongly urge the IRRC to reject the proposed regulation IRRC 3227 for the sake of our essential industry and others in the Commonwealth.

Sincerely,

A handwritten signature in black ink, appearing to read "Angelo Medico". The signature is fluid and cursive, with a large initial "A" and "M".

Angelo Medico

President, Mid-Atlantic Chapter-ISRI

A handwritten signature in black ink, appearing to read "Aaron M. Plitt". The signature is cursive and stylized, with a large initial "A" and "P".

Aaron Plitt

President, Pittsburgh Chapter-ISRI