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**AUTOMOTIVE  
RECYCLERS  
ASSOCIATION**  
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May 13, 2019

**RECEIVED  
IRRC**

Independent Regulatory Review Commission  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

2019 MAY 13 A 10:08

RE: DEP, Water Quality Management, NPDES Permit Application & Annual Fees, IRRC Reference Number 3227

Dear Members of the Commission,

The Automotive Recyclers Association (ARA) represents over 4,500 professional automotive recyclers across the United States and in 14 countries internationally. ARA appreciates the opportunity to provide comments regarding the Department of Environmental Protection (DEP)'s proposed regulation to increase fees for the Water Quality Program and National Pollution Discharge Elimination System. ARA has serious concerns with the significant increase in fees as this would have serious negative consequences and potentially put many small automotive recycling facilities in Pennsylvania out of business.

ARA understands the desire of DEP to maintain a strong permitting program to prevent and eliminate water pollution within the Commonwealth, and to collect reasonable filing fees for applications and permits. However, the proposed rate of increase is simply staggering. ARA members categorized as Minor IW Facilities not covered by ELG would see the fee for a new individual permit increase by 500 percent, from \$1,000 to \$5,000. This could be a significant deterrent for some businesses. For existing permit holdings, the annual fee would also increase by 500 percent, from \$500 to \$2,500. That is an extra \$2,000 that some small businesses may not have – and these are law abiding, legally operating facilities.

ARA and its affiliate state chapter, the Pennsylvania Automotive Recycling Trade Society (PARTS), have a history of a positive working relationship with the Department of Environmental Protection on making the necessary state regulations related to stormwater permitting issues the best that they can be for the waters, citizens and regulated industries of the Commonwealth. Likewise, ARA has much experience with working with the U.S. Environmental Protection Agency (EPA) on stormwater permitting issues.

I strongly urge the IRRC to oppose these proposed fee increases for these two programs as well as the proposed changes to the oversight process for changing the fees. The increase in fees represents a serious burden for many professional automotive recycling businesses and would have far reaching consequences on the waters, citizens and regulated industries businesses.

Sincerely,

Sandy Blalock  
Executive Director