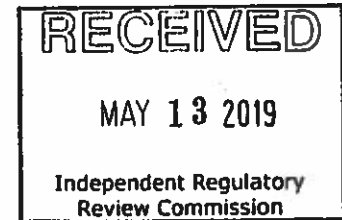


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P.O. Box 1307, Mechanicsburg, PA 17055
505-228-0401 or 717-458-8266



May 10, 2019

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

RE: IRRC Reference Number 3227, EPA, NDPES, Water Quality Management Annual Fees

Dear Members of the Commission,

The Pennsylvania Automotive Recycling Trade Society (PARTS) represents 130 professional automotive recyclers in Pennsylvania. PARTS 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. PARTS and our members have 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.

PARTS 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. PARTS 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 would be a significant deterrent for most 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 most small businesses may not have – and these are law abiding, legally operating facilities.

PARTS has 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.

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.

Respectfully,

Sandy Blalock
Executive Director

"Recycling Today to Protect Pennsylvania's Future"