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To: Independent Regulatory Review Commission (IRRC)

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Subject: DEP WQM and NPDES Permit Application and Annual Fees, IRRC reference number 3227

VET Environmental Engineering, LLC (VET) represents many clients in the auto salvage industry across Pennsylvania. We are writing to express our opposition to the proposed fee increases being considered by the Department of Environmental Protection (DEP) under the title of the Water Quality Management and National Pollution Discharge Elimination System (NPDES) Permit Application and Annual Fees, IRRC reference number 3227. These proposed increases would have a significant economic impact on the auto salvage industry.

One such client has operated a family business in Pennsylvania for over 70 years. They are a small business that provides jobs, services, and tax revenue to my community. Their operation is classified as a Minor Industrial Waste Facility not covered by an Effluent Limitation Guideline. They have faithfully paid their NPDES permit fees annually. The existing fee rate is \$500, which the proposed legislation would increase to \$2,500 – a fivefold increase. The proposal also allows the DEP to further increase fees every two years without legislative review.

Auto salvage yards are a vital part of the Pennsylvania economy and have a major impact on resource conservation. By recycling automotive parts, we save the natural ores, oil, water, and energy needed to manufacture new parts. This reduces air pollution as well as our nation's dependence on foreign oil. Additionally, parts that cannot be reused provide the number one source of our national scrap metal supply. Tons of cast iron, steel, aluminum, platinum, copper, and lead are recovered annually by the automotive recycling industry.

Many of the auto salvage yards operating in Pennsylvania today are small family-run businesses that cannot afford dramatic increases in fees and expenses. These businesses would be unduly burdened by the proposed fivefold increase in the permit fee and we strongly oppose the proposed rule change. We urge you to reject the proposed regulation IRRC 3227 regarding Water Quality Management and National Pollution Discharge Elimination System Permit Application and Annual Fees.

Thank you,

VET Environmental Engineering, LLC

"Compliance that makes sense."