

3227 Form Letter B.13

5-14-19

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



RE: DEP, Water Quality Management, NPDES & Annual Fee, IRRC Reference Number 3227

Dear Members of the Commission,

Our company, MAR Motors LLC 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. As a participating company permitted under Minor IW Facilities not covered by ELG we have serious concerns with the significant increase in fees as this would present burdensome financial consequences on our family owned and operated small business.

We certainly understand 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 and trying to comprehend the fee as an existing permit holder, the annual fee would increase by 500 percent, from \$500 to \$2,500.

As a member of the Pennsylvania Automotive Trade Society (PARTS) I believe we have demonstrated 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 most professional automotive recycling businesses and would have far reaching

consequences on the waters, citizens and regulated industries businesses.

Respectfully, *Laurence A Hunt*
Your Name *Laurence A Hunt*
Company name

5-14-19

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