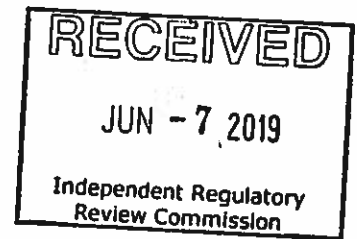


3231.



Clean Air Board of Central Pennsylvania
Comments to the Environmental Quality Board
Re: Air Quality Fee Schedule Amendments (#7-536)

The Clean Air Board of Central Pennsylvania is a faith-based citizens' initiative dedicated to achieving clean air to protect our health and quality of life. We accomplish our mission by raising public awareness of air quality issues, by advocating for policies which will produce cleaner air, and by monitoring air quality. The Clean Air Board supports the proposed regulations Air Quality Fee Schedule Amendments (#7-536).

The Clean Air Board recognizes that it costs a substantial amount of money to administer an effective air quality program which protects the public health and welfare. Every aspect of the DEP air quality program – from informing the public of air quality “action days” to issuing a determination of reasonably available control technology – involves staff time, engineering expertise, and professional judgment. DEP’s Bureau of Air Quality has been constrained by budgetary resources for many years. The revenue generated by the existing fee schedule is no longer adequate to fund the operations of the air quality program. The program’s expenditures exceed its revenues. This has resulted in the air quality program reducing staff, which in turn negatively impacts both the time it takes the program to issue plan approvals and operating permits and the Bureau’s ability to conduct inspections, respond to complaints, and pursue enforcement actions when necessary. It is time to make corrections to the fee schedule.

The proposed amendments to the Air Quality Fee Schedule do not change the per ton fee on emissions from Title V sources, which was set in 2013 and is indexed to inflation. The proposed amendments would increase application fees for Plan Approvals and Operating Permits and the annual administration fees charged to Operating Permit holders. Those fees were set according to a schedule that was developed in the early 1990s and were last increased in 2005. The proposed amendments would, for the first time, impose fees on regulated sources of air pollution for certain of the determinations and assessments that DEP regularly performs for the regulated community, including requests for determination, risk assessments, and confidential business information determinations. It is appropriate for members of the regulated community to pay for these determinations and assessments because they need these services and because performing the determinations and assessments requires substantial air quality program’s staff time.

The potential negative impacts to the environment and public health that could result from an inadequately-funded air quality program are obvious. Air quality may deteriorate. Permits will be delayed. Determinations will not be issued. An inadequately-funded air quality program also threatens to negatively impact Pennsylvania’s economy, by slowing or preventing businesses from investing in new facilities and modernizing their existing facilities in the Commonwealth.

The proposed amendments to DEP's Air Quality Fee Schedule will help move DEP's air quality program to a sounder financial foundation. The proposed amendments will also do a better job of matching the amount of work that the air quality program performs for members of the regulated community with the fees it charges them to perform that work. For these reasons, the Clean Air Board of Central Pennsylvania supports the fee amendments.

Respectfully submitted,

The Clean Air Board of Central Pennsylvania
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