

44TH DISTRICT  
JOHN C. RAFFERTY, JR.

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### Senate of Pennsylvania

January 22, 2010

- COMMITTEES**
- TRANSPORTATION, CHAIRMAN
  - APPROPRIATIONS
  - BANKING & INSURANCE
  - CONSUMER PROTECTION & PROFESSIONAL LICENSURE
  - JUDICIARY
  - LAW & JUSTICE
- ADVISORY COUNCIL FOR THE SOUTHEASTERN VETERANS' CENTER
- JOINT STATE GOVERNMENT COMMISSION, VICE CHAIRMAN
- PENNSYLVANIA COMMISSION ON CRIME AND DELINQUENCY
- TARGETED COMMUNITY REVITALIZATION AND CRIME PREVENTION ADVISORY COMMITTEE
- STATE TRANSPORTATION COMMISSION

Honorable John Hanger, Chairperson  
Environmental Quality Board  
16th Floor, Rachel Carson State Office Building  
400 Market Street  
Harrisburg, PA 17101-2301

Dear Secretary Hanger:

On behalf of the East Norriton, Plymouth, and Whitpain Joint Sewer Authority, I would like to submit the enclosed letter regarding the proposed revisions to Chapter 92, and hope that you will include this letter as part of the public comment period.

The proposed regulations would dramatically increase the permitting fees for wastewater treatment facilities, shifting the taxpayer burden from the state to the municipalities and authorities.

I respectfully request your review of the enclosed letter and ask that you keep these comments in mind during the regulatory process. Thank you. As always, I remain

Very Truly Yours,

John C. Rafferty, Jr.

JCR/sgm

cc: Timothy Boyd, JSA

**SECRETARY'S OFFICE**

**JAN 22 2010**

**DEPARTMENT OF ENVIRONMENTAL PROTECTION**

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2010 MAR -9 PM 2:39  
REGULATORY  
ADMINISTRATION



## East Norriton ★ Plymouth ★ Whitpain Joint Sewer Authority

200 Ross Street  
Plymouth Meeting, Pennsylvania 19462

(610) 279-5759  
Fax (610) 279-8033

January 14, 2010

State Senator Daylin Leach  
601 S. Henderson Road, Suite 208  
King of Prussia, PA 19406

State Senator John C. Rafferty  
3770 Ridge Pike  
Collegeville, PA 19426

State Rep. Kate Harper  
1515 DeKalb Pike, Suite 106  
Blue Bell, PA 19422

State Rep. Matthew Bradford  
1846 Markley Street  
Norristown, PA 19401-2904

State Rep. Michael Gerber  
527 Fayette Street  
Conshohocken, PA 19428

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NORTHWEST REGULATORY  
DIVISION

**Re: Proposed DEP Chapter 92 Regulations**

Dear Lady and Gentlemen:

I am writing to you on an issue of importance to the JSA regarding DEP's proposed revisions to Chapter 92, National Pollutant Discharge Elimination System Permitting, Monitoring And Compliance.


The proposed regulations include a substantial increase in permitting fees for wastewater treatment facilities, such as ours. Under the proposed regulations, our previous \$500 permit fee will rise to \$5,000. In addition, for the first time, an annual fee of \$2,500 for each of the four remaining permit years will be imposed.

While the JSA appreciates the current fiscal conditions in Harrisburg, especially as it relates to DEP, we believe the continued increase and expansion of fees merely shifts the taxpayer burden from the state to municipalities and authorities.

Anything you can do to mitigate this type of cost shifting is greatly appreciated.

Please feel free to contact me at (610) 279-5759 or [director@enpwjsa.org](mailto:director@enpwjsa.org) if I can provide any additional information.

Sincerely,

  
Timothy A. Boyd, P.E.  
Executive Director

C: ENPWJSA Board