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Project No. 09062.19

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MAR 15 2010

ENVIRONMENTAL QUALITY BOARD

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

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MAR 17 2010
INDEPENDENT REGULATORY
REVIEW COMMISSION

**SUBJECT: NPDES PERMIT PROGRAM REGULATION UPDATE AND
NEW FEE STRUCTURE**

On behalf of our Client, the Mount Pocono Municipal Authority, we would like to enter comment on the PA DEP's proposed rulemaking to delete Title 25, Chapter 92 and revise the Chapter to include a new fee structure.

It is our belief that the fees that are being proposed in the program would put a burden on the Authority and its rate payers. The fees appear to be excessive as compared to the amount of work involved for a permit renewal.

We would hope that the PA DEP would reconsider these fees given the state of our current economic climate.

Respectfully submitted,

R.K.R. HESS ASSOCIATES, INC.

Samuel M. D'Alessandro, P.E., P.P., P.L.S.
President

SMD/acj

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