



David W. Hacker, General Attorney – Environmental
United States Steel Corporation
Law Department
600 Grant Street
Pittsburgh, PA 15219-2800
Tel: 412.433.2919
Fax: 412.433.2964
E-mail: dwhacker@uss.com

SUMMARY OF COMMENTS OF UNITED STATES STEEL CORPORATION
ON PROPOSED AIR QUALITY TITLE V FEE AMENDMENT
PROPOSED RULE [43 Pa.B. 677]

1. An increase by 50% is unjustified and unreasonable – even considering PADEP’s concerns with regards to funding declines because of pollution reductions.
2. The fees are substantially out of line with the fees collected in other states with a strong manufacturing base, including those in which U. S. Steel operates.
3. Imposing an increase for the current calendar year (in which we operate) is essentially a “retroactive tax.”
4. EQB and PADEP fail to recognize the inordinate regulatory costs borne by the manufacturing industry in the last several years as major regulatory initiatives have resulted in significant costs to industry. While some of the reductions achieved were voluntary, others were the result of more stringent regulations. Therefore, the true costs of the regulations would not be evaluated.
5. The current and proposed fee structure is skewed by capping the fees on a pollutant-by-pollutant basis; and the fee structure does not recognize the reduced need of resources to renew a Title V permit when compared to the resources needed to issue an initial Title V permit.
6. The majority of the proposed increase of fees would inequitably be absorbed by a few manufacturing facilities and is not commensurate with PADEP’s (or Allegheny County Health Department’s) resources needed to administer the air program with those facilities.
7. The increase would serve as a disincentive to build or expand a significant manufacturing facility in Pennsylvania.