

Good evening. My name is Rachel Filippini and I'm the executive director of the Group Against Smog and Pollution (GASP). For more than 50 years we have worked to improve air quality in southwestern Pennsylvania.

We are happy to see before council this evening the Allegheny County Health Department's proposal to amend its regulations to be consistent with the Pennsylvania Department of Environmental Protection (DEP) fee structure.

GASP has strongly supported the fee schedule changes proposed by both the state and the Allegheny County Health Department's Air Quality Program. GASP believes revisions to the fee schedule are necessary for the Air Quality Program to be able to fulfill its mission of protecting air quality in Allegheny County.

If approved, the amended regulation would increase application fees for plan approvals, operation permits, and the annual administration fees charged to permit holders that were based on a schedule set all the way back in the 1990s and last increased 14 years ago.

The proposed fee schedule is tiered, with the first set of increases going into effect 60 days after final adoption through 2025. The fees then increase in 2026 and then again in 2031. If finally approved, the plan would for the first time impose fees on major and minor sources of air pollution seeking:

- revisions to plant-wide applicability limits;
- ambient air impact modeling done in connection with certain plan approval applications;
- risk assessments; and
- requests for determination

It's important to understand that the Clean Air Act requires that the fees imposed on Title V sources in Allegheny County be 'sufficient to cover all reasonable (direct and indirect) costs required to develop and administer' the health department's Title V permit program.

Because ACHD's Air Quality Program receives little or no funding from Allegheny County itself, that means the fees paid by non-Title V sources in the County must also generate sufficient revenue to fund the non-Title V side of the Program – making these changes absolutely imperative.

Thank you.