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PENNSYLVANIA CAMPAIGN FOR CLEAN WATER

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The Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg PA 17101

RECEIVED
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INDEPENDENT REGULATORY
REVIEW COMMISSION

RE: IRRC Regulation #2659: Triennial Review of Water Quality Standards

Dear Commissioners:

The undersigned organizations support the proposal by the Pennsylvania Department of Environmental Protection (DEP) to establish a new statewide water quality standard for molybdenum (Mo). We urge you to approve DEP's proposed Triennial Review of Water Quality Standards, which includes this new standard.

We believe that the Department has done an excellent job in assessing the risks that molybdenum poses to human health and developing a criterion based on the United States Environmental Protection Agency (EPA) Integrated Risk Information System (IRIS).

As DEP has recognized, molybdenum is a toxic metal causing gout-like symptoms and disorders of the gastrointestinal tract, liver and kidney. In addition, it is also a teratogen, and can cause developmental deformities. It is discharged into the waters of our state by at least six facilities, potentially exposing people that use those waters to its health effects.

DEP not only developed its proposed standard using not only toxicity information from EPA's IRIS database, but also supplemented this data with other toxicity information approved by EPA from the Institute of Medicine. The data that DEP used is much broader and more scientifically credible than the single study suggested by some industry commentators.

Further, we have noted that DEP consulted with US EPA's Office of Science and Technology in developing its standard; and that US EPA's Headquarters and Region 3 staff have concurred that DEP used the appropriate methodology and data in developing its proposed molybdenum standard.

We applaud DEP for taking a pro-active approach to this issue. We hope that the IRRRC will approve DEP's proposed rulemaking in order to safeguard all Pennsylvanians who recreate in and drink from the Commonwealth's rivers and streams.

Sincerely,

Robert Wendelgass
Pennsylvania Campaign for Clean Water

Brian Glass
Citizens for Pennsylvania's Future

Myron Arnowitt
Clean Water Action

John Hoekstra
Green Valleys Association

Thomas Au
Pennsylvania Sierra Club