



August 9, 2022

Acting Secretary Ramez Ziadeh, P.E.
Department of Environmental Protection
16th Floor, Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101
rziadeh@pa.gov

RE: Final Rulemaking Before EQB: Water Quality Standards for Manganese and Implementation

Dear Acting Secretary Ziadeh,

On September 21, 2020, the Delaware Riverkeeper Network (DRN) submitted comments supporting the proposed amendments to Chapters 93 and 96 relating to manganese that were published in the July 25, 2020 PA Bulletin. For many years prior DRN has also been following the process within the Department; we are delighted to see this final rulemaking for manganese limits finally before the EQB this month. DRN appreciates the opportunity for public comment and strongly supports the final-form rulemaking to add manganese to the list of toxic substances to protect human health and aquatic life, establish a surface water manganese criterion of 0.3 mg/L, and maintain the current point of compliance for manganese in all surface waters at the point of discharge. It is clear that the public overwhelmingly supports these amendments, with 924 commentators in favor and only 34 commentators opposed. The opposition came from the mining industry that has a history of pressuring officials to ignore science at the expense of public health. As the results showed, the interests of the mining industry do not reflect the interests and the rights of the citizens of Pennsylvania, who have a right to clean air and water under the Environmental Rights Amendments of the Pennsylvania Constitution.

DRN applauds the EQB for maintaining their position when the mining industry stated that manganese dissolves into a harmless form. As stated by the EQB, manganese is not physically or chemically transformed into non-toxic substances in receiving waters. While manganese may change between dissolved and particulate forms as a result of stream chemistry and other factors, it is not actually removed from the water through these processes. DRN agrees that dischargers must comply with all applicable WQSs and must protect water uses including aquatic life that live in the streams that are still treated as waste sites by mining operators – if they discharge - forcing them to adhere to strict standards is critical to the health and

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safety of our waterways. This rulemaking protects the potable water supply use and other protected water supply uses such as irrigation, wildlife water supply, livestock water supply, aesthetics, fishing, boating, and water contact recreation. DRN fully supports this final-form rulemaking that values the residents, aquatic life, and natural resources of Pennsylvania and we look forward to seeing the EQB move this rulemaking along for the benefit of all Pennsylvanian's at their August 9, 2022 meeting. Thank you for your time and consideration and work in this important matter.

Sincerely,



Maya K. van Rossum
the Delaware Riverkeeper



Faith Zerbe
Director of Monitoring
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