

# 3260

September 7, 2022

*Sent via email*

Chairman George D. Bedwick  
Independent Regulatory Review Commission  
333 Market Street  
Harrisburg, PA 17101

**RECEIVED**

SEP - 7 2022

Independent Regulatory  
Review Commission

**RE: Regulation #7-553: Water Quality Standard for Manganese and Implementation  
IRRC No. 3260**

Dear Chairman Bedwick and Commissioners:

I am a Professional Geologist in the state of Pennsylvania, working for The EADS Group, Inc. in Clarion. I have nearly 30 years of experience with environmental and design issues related to earth disturbances, mainly for mining and site development activities. These projects have shown me that no two sites are alike and that geologic conditions can and do create a wide range of environmental variation in both undisturbed and disturbed settings. Some areas, even in undisturbed locations, have water quality characters that are less than ideal. The implementation of the proposed manganese limits will ultimately sterilize certain areas from future development, due in part to natural conditions that already convey undisturbed water quality above the proposed manganese limits. No industry will commit to an unreasonable standard when Mother Nature can't abide.

Additionally, the state of Pennsylvania has many of their own projects that involve impaired waters, that would require extensive upgrades to achieve the same standards that are being proposed. Will it be fine for the state to get a pass, while industry is stuck trying to reach goals that appear to lack scientific data to suggest that the effort is worthy?

I believe that the achievement of the proposed manganese limit set in Regulation 7-553 will have little impact on the environment and will create negative economic consequences by increasing the cost to consumers that produce the natural resources we all use every day. And when the state is held to the same standard, tax-payers will be footing the bill further, taking additional funds out of pocket. If we are being asked to pay for the betterment of the environment, I ask that it be done for a more worthy cause.

Sincerely,

Robert Stormer, P.G.