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September 12, 2022

Sent Via Email on 9/12/22

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

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

Dear Chairman Bedwick and Commissioners:

My name is Terry W. Schmidt and I am Vice President of Engineering with Earthres Group, Inc. My engineering consulting career spans over 30 years including design of over 100 treatment systems for mining impacted water. I urge you to disapprove Regulation #7-553: Water Quality Standard for Manganese and Implementation, IRRC No. 3260.

Existing Manganese discharge limits protect stream health, fish, macroinvertebrates, and also protect human health. The new water quality standard would result in unnecessary costs that approach or exceed one billion dollars of additional liability to the private sector for water which is currently adequately treated. In addition, this regulation may result bankruptcies and forfeiture of existing bonds that are not funded to treat Manganese to the new water quality standard. Those water treatment liabilities would then be delegated to the Department of Environmental Protection and the taxpayers of Pennsylvania with inadequate funds to treat Manganese.

I could personally benefit from this water quality standard for Manganese as many companies would seek engineering consulting assistance. However, I cannot in good conscience stand idly by without comment regarding a costly regulation that would NOT result in measurable environmental or human health benefits.

Sincerely,

Earthres Group, Inc.

Terry W. Schmidt, P.E.
Vice President of Engineering