



September 12, 2022

Sent via email

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 Robert Menard and I am an employee of New Enterprise Stone & Lime Co., Inc. in the Lancaster area. My job is a fulfilling way to utilize my geology degree, provides a good wage to support my young family, and, most importantly, plays a vital role in helping numerous communities thrive in southeast and southcentral Pennsylvania. Even as a relative newcomer to the company and area, I am very proud of the work we do to improve the lives of Pennsylvanians and hope that can continue for years and decades to come.

I am requesting your disapproval of Regulation #7-553: Water Quality Standard for Manganese and Implementation, IRRC No. 3260 for the following reasons:

- This regulation ignores the intent of Act 40 of 2017.
- This regulation is discriminatory as it only applies to permitted discharges and there are thousands of unpermitted discharges of manganese across the Commonwealth that are the responsibility of the Department of Environmental Protection (DEP).
- DEP has not developed a complete picture of the cost of this regulation. This regulation will cost my company additional unnecessary expenditures with no significant measure of environmental or health benefits.
- The Department's use of the modifying factor of 3 is outdated and not legally or scientifically required to be used.

If and when EPA develops a nationwide regulation for human health for manganese, DEP could then develop a regulation that is equitable across the Commonwealth and accounts for all discharges of manganese into PA waters.

Sincerely,
Robert Menard