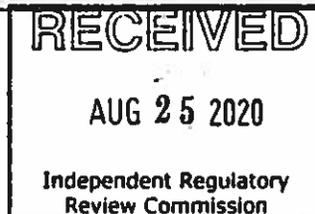


From: ecomment@pa.gov
Sent: Tuesday, August 25, 2020 3:51 PM
To: Environment-Committee@pasenate.com; IRRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com
Cc: c-jflanaga@pa.gov
Subject: Comment received - Proposed Rulemaking: Water Quality Standards for Manganese and Implementation (#7-553)

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Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Water Quality Standards for Manganese and Implementation (#7-553).

Commenter Information:

Joseph Gianvito
 Moon Township Municipal Authority (jgianvito@klhengineers.com)
 KLH Engineers, Inc. 5173 Campbells Run Road
 Pittsburgh, PA 15205 US

Comments entered:

The Moon Township Municipal Authority (MTMA) owns and operates a water treatment plant (WTP) with both groundwater and surface water sources. MTMA's WTP also has an NPDES Permit for discharge of filter backwash, which is treated to reduce sediments, to the Ohio River. The NPDES Permit currently includes a manganese limit of 1 mg/L. MTMA is concerned with DEP's proposed second alternative for manganese water quality standard revisions. Implementation of the second alternative would potentially result in the NPDES Permit manganese limit decreasing from 1 mg/L to 0.3 mg/L. It is unlikely that this limit would be met without incurring significant cost for WTP upgrades. These plant upgrades would have no impact on finished water quality and would likely be unnecessary to protect downstream surface water sources, and therefore the financial impact to MTMA's customers cannot be justified. With the goal of protecting water supplies from high levels of manganese in mind, MTMA requests that DEP consider the first alternative as a more practical regulatory change. Point source discharges such as the MTMA WTP will likely have no impact on the Ohio River's manganese concentration given how low the discharge rate is relative to the River's flow rate. However, if the discharge did have an impact, it would be reasonable to justify NPDES changes that are based on actual receiving stream water quality modeling, with the intent of ensuring that manganese concentrations remain below 0.3

mg/L at water supplies, as compared to imposing a conservative limit uniformly on dischargers to all receiving streams.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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