

#3260

FRIENDS OF TOM'S CREEK

Sent via Email: RegComments@pa.gov

September 23, 2020

**Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477**



Re: Water Quality Standard for Manganese and Implementation (#7-553)

To Whom It May Concern:

On behalf of the Friends of Toms Creek I write to support the proposed water quality standard for manganese of 0.3 mg/l. This more stringent standard is necessary to protect not only human health but the health of our rivers and aquatic life. The current manganese effluent limit in Pennsylvania of 1.0 mg/l was not meant to be protective of human health, aquatic life, or water supply use.

More importantly, I also write to oppose the alternative proposal to change the point of compliance from the point of discharge to the point of drinking water intake. The point of compliance for the manganese effluent limit must remain where the pollution occurs - at the point of discharge. This is the only way that Pennsylvania can ensure that our streams and aquatic life - indeed, all uses of the river - are protected.

Manganese is a persistent contaminant that can be carried far downstream. Manganese can cause negative impacts to human health and aquatic life, as well as other uses of water such as for agriculture and recreation. Because of these impacts, changing the point of compliance to the intake for potable water supplies would not protect human health and the environment throughout our streams. Maintaining the point of discharge compliance ensures that our waters are protected whether or not a drinking water supply is downstream.

This alternative would also inappropriately place the burden of treating the pollution on the public water systems, rather than with the polluter. The public should not have to be forced to bear the costs of treating this pollution in order to create a windfall for the mining industry.

The Clean Water Act and the Clean Streams Law recognize that the discharger must be responsible for limiting the pollution it dumps into PA's waters. Additionally, requiring the new standard to be met at the discharge point protects not only human health, but all the uses of our streams – from aquatic life and recreation to municipal, industrial, and agricultural uses. Changing the long-standing point of compliance from the discharge point to the intake for potable surface water supplies would undermine protections of Pennsylvania's waterways that have been in place for decades.

Toms Creek watershed is a High Quality Cold Water Fishery, now being assessed by the PA-DEP for its Exceptional Value existing use. Stocked with trout and fished by avid anglers each season, this use depends on the healthy macro-invertebrate population supported by pollution free water.

In short, Friends of Toms Creek supports the proposed manganese standard of 0.3 mg/l and the point of compliance for this more stringent standard to remain at the discharge point.

Thank you for your consideration of these comments.

Respectfully submitted,

Susan C. deVeer, Secretary-Treasurer