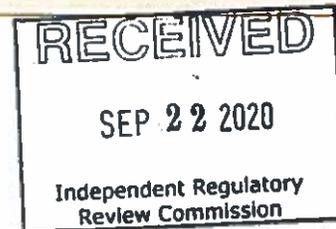


Stephen Hoffman

#3260

From: ecomment@pa.gov
Sent: Monday, September 21, 2020 11:07 PM
To: Environment-Committee@pasenate.com; IRRC; 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:

John Detisch
Pennsylvania Division of Izaak Walton League (cdetisch@atlanticbb.net)
241 Thompson 2 Road
New Salem, PA 15468 US

Comments entered:

To Whom It May Concern:

I am writing to urge the Environmental Quality Board (EQB) and the Pennsylvania Department of Environmental Protection to protect human health and all uses of our streams by adopting the more stringent manganese water quality standard of 0.3 mg/l and requiring that the discharge point remains the point of compliance for this standard.

While manganese is a naturally occurring element, with high or long-term exposure, it can lead to serious human health impacts including neurological impacts. Manganese is also harmful to aquatic life and can impact other water uses like agriculture and recreation. Manganese enters our waters primarily through discharges from mining and quarry operations.

The current manganese standard of 1.0 mg/l is inadequate to protect human health from the neurotoxicological effect of manganese. The proposed standard of 0.3 mg/l is protective of human health (and other water uses) and therefore should be adopted by the EQB.

Perhaps more importantly though, the EQB must reject the proposed alternative to change the point of compliance from the discharge point to the intake point for drinking water supplies. First, in accordance with federal and state laws and regulations, the discharger of pollution must be responsible for limiting the pollution it dumps into our waters. Dilution is not the solution to

pollution! Second, the toxicity of manganese is determined by the PH of the water. Therefore it is best tested and corrected at the source. This change should also address the relationship of PH to manganese. Compliance at the point of discharge protects all water uses of our streams, including aquatic life. Third, requiring compliance at the point of discharge protects all of Pennsylvania's waters, regardless of whether water is a safe environment for aquatic life, used for recreation or as a source of drinking water. Fourth, cost of pollution belongs to the shareholders not the stakeholders. This change will shift responsibility and cost to the consumer. Fifth, no matter the decision the standard needs to apply to all industries, owners and polluters.

For these reasons, the EQB must adopt the more stringent manganese water quality standard of 0.3 mg/l and require that the discharge point remains the point of compliance for this standard.

Respectfully submitted,
John Detisch

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

Jessica Shirley
Director, Office of Policy
PA Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Office: 717-783-8727
Fax: 717-783-8926
ecomment@pa.gov