

Stephen Hoffman

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From: ecomment@pa.gov
Sent: Wednesday, September 23, 2020 4:24 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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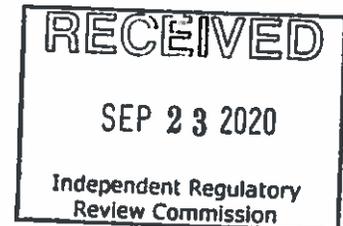


Re: eComment System

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 Lizak
citizen (lizakmvc@aol.com)
1903 Main St
Northampton, PA 18067 US



Comments entered:

To Whom It May Concern:

I am a mineral exploration geologist, hydrogeologist, mineral economist, and an independent mineral producer. I've given expert testimony on mineral valuation, resource extraction, and geoscience issues in numerous public forums. I provided expert testimony and/or litigation consulting in international tribunals and many federal and/or state courts in the United States on behalf of individuals, governments, and companies. I've been retained as an expert witness on behalf of the U.S. Department of Justice, the Army Corps of Engineers, the Bureau of Land Management, and the Bureau of Indian Affairs in high value mineral valuation cases associated with Hurricane Katrina, Tribal Trust claims, etc. Many of my clients operate quarries and coal mines withing the Commonwealth.

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.

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, because manganese can travel far downstream, 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 there is a drinking water supply downstream.

Consequently, 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,

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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