#3260

Testimony for Water Quality Standards for Manganese and Implementation

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Commenting on behalf of
Pennsylvania Mining Professionals (PMP)

A SOLUTION WITHOUT A PROBLEM

Good afternoon. My name is Ron Musser, and I am a Registered Professional Geologist in the states of Pennsylvania and New York. I am Vice President of Musser Engineering, Inc. and current President of Pennsylvania Mining Professionals. I have been involved in the environmental consulting business for over thirty years, and have worked with the Maryland Bureau of Mines, as well as the PA Department of Environmental Protection on approximately 200 mining permits and Government Financed Construction Contracts.

I speak to you today on behalf of Pennsylvania Mining Professionals. We are a statewide organization comprised of Engineers, Geologists, Surveyors and other Scientific Professionals directly involved in the preparation of various permits serving the coal, aggregate and other mining industries.

In 1999, a surface mine permit was issued to a mining company in Somerset County, PA. The seams mined were the Upper, Middle and Lower Kittanning coal seams. The mine was very successful and today you could walk across the backfilled and reclaimed mine site and never know that mining ever took place. An Erosion and Sedimentation pond was left in as a post-mining structure at the request of the landowner. Above the pond, a pipe outlet from a DEP-approved pit floor drain flowed into the pond and provided a year round source of cool water. Aquatic life, including pan fish that had been introduced into the pond, were thriving.

The permit was due for renewal in 2014 and the renewed permit imposed a manganese discharge limit to this sedimentation pond. With the stroke of a pen, the pond went from a beautiful farm pond to a water treatment facility. Chemicals in the form of caustic soda ash are now required to meet the restrictive manganese limit. The pond is now dead and harmful chemicals have replaced aquatic life. Treatment costs also went from zero dollars to nearly $20,000 per year. There was no stream degradation and no drinking water standards were even remotely in jeopardy. In this instance, manganese restrictions on the pond are harming the environment not helping and ultimately created: "A Solution Without a Problem".

In 1987, I began monitoring the Stonycreek River located just upstream of the Hooversville Borough Water Supply Intake and currently have data that dates all the way back to 1982. This water sample collecting was done for various mining companies and continued almost uninterrupted until January 2020. The comparative data for manganese above the Hooversville Water Supply Intake has actually improved and over the last few years, manganese levels have decreased. This has occurred even though many successful surface mines have operated within the watershed and within this same time period. Again, proving that manganese restrictions are "A Solution Without a Problem".

On a final note, the team at Musser Engineering are active volunteer members of the Stonycreek-Conemaugh River Improvement Project. We volunteer our time to provide quarterly sampling and monitoring for the Oven Run Treatment System that the "Scrip" Watershed Organization has installed to passively treat Preact AMD, which data shows, has had a direct improvement on the Stonycreek River. If Pennsylvania is to continue to be a leader and an example in water quality improvement, advancement and maintenance, then our focus should be on a collaborative effort

between the DEP, watershed groups and the industry, rather than spending time and resources on finding a solution to a nonexistent problem.

Thank you for your time.

Wilson Creek Energy, LLC
Acosta II

2019

Month / Costs	January	February	March	April	May	June	July	August	September	October	November	December	2019 Totals
Caustic	$ 1,285.83	$ 1,133.73	$ 691.47	$ -	$ 2,574.00	$ 1,110.00	$ 1,110.00	$ 1,110.00	$ 886.89	$ -	$ 886.89	$ -	$ 10,788.81
Outside Contracting	$ -	$ -	$ -	$ -	$ -	$ -		$ -	$ -	$ -	$ -	$ -	$ -
Other Expenses	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Labor	$ 560.00	$ 560.00	$ 560.00	$ 560.00	$ 560.00	$ 560.00	$ 560.00	$ 560.00	$ 560.00	$ 560.00	$ 560.00	$ 560.00	$ 6,720.00
Sampling	$ 57.00	$ 57.00	$ 57.00	$ 57.00	$ 57.00	$ 57.00	$ 57.00	$ 57.00	$ 57.00	$ 57.00	$ 57.00	$ 57.00	$ 684.00
Totals	$ 1,902.83	$ 1,750.73	$ 1,308.47	$ 617.00	$ 3,191.00	$ 1,727.00	$ 1,727.00	$ 1,727.00	$ 1,503.89	$ 617.00	$ 1,503.89	$ 617.00	$ 18,192.81

Note 1: Labor is based from the $35/hour (which includes benefits) and the number of hours needed for travel to site.
Note 2: Sampling is based on $28.50 per sample.
Note 3: No sludge removal.

Removed Costs

Outside Contracting

Total

Other Expenses

Total

2019

	January	February	March	April	May	June	July	August	September	October	November	December	2019 Total
Total Gallons Treated (000)	3,571	4,636	3,160	3,751	3,350	2,376	1,786	1,280	750	800	1,275	893	27,628