

#3260

Form Letter B 1-499

**Stephen Hoffman**

**From:** Griffin, Laura <laurgriffi@pa.gov>  
**Sent:** Thursday, September 24, 2020 7:53 AM  
**To:** EP, RegComments; environmentalcommittee@pahouse.net; Environment-Committee@pasenate.com; IRRRC; Troutman, Nick; Glendon King; Collins, Tim; Iversen, Sarah A.  
**Cc:** Reiley, Robert A.; Shirley, Jessica; Chalfant, Brian  
**Subject:** Form Letter Notice #2 - Proposed Rulemaking: Water Quality Standards for Manganese (#7-553)  
**Attachments:** Form Letter 2 Protect Human Health WQS Manganese (7-553).pdf

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Good morning,

Attached is the second form letter DEP has received regarding Proposed Rulemaking: Water Quality Standards for Manganese (#7-553). We have labeled this form letter "Protect Human Health WQS for Manganese." To date, we have received 499 copies of this letter via email.

Thank you,  
Laura



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*In order to prevent the further spread of COVID-19, all DEP offices will remain closed until restrictions are lifted. In the meantime, I will be working remotely to continue the mission of the Pennsylvania Department of Environmental Protection and frequently retrieving emails. Thank you for your patience.*

## **FORM LETTER 2 – “Protect Human Health”**

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, 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.

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.