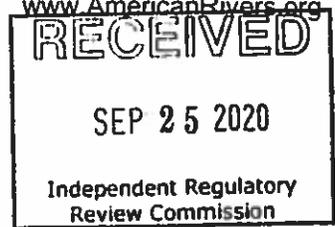


# 3260



September 25, 2020

Pennsylvania Department of Environmental Protection (DEP)  
VIA EComment Webpage

**Re: Proposed Amendments to 25. Pa Code, Chapter 93 and 96: Water Quality Standards for Manganese and Implementation**

Dear Sir or Madam,

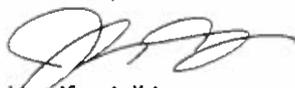
American Rivers believes, consistent with Pennsylvania Clean Streams Law, that instream and tap water should be protected and clean. Further, Pennsylvanians expect that public water suppliers are able to deliver clean water equitably and affordably to all citizens. To facilitate water suppliers' ability to meet expectations, discharges to waterways should be protective of the highest standard for human consumption at the point of discharge.

Therefore, we are opposed to eliminating the long-standing requirement for polluters to the state's waterways to maintain a minimum amount of manganese (Mn) at the point of discharge and instead allowing the measurement to occur at the point of downstream public water system withdrawal. As detailed in our February 26, 2018 comments, this proposed change in the point of compliance 1) does not ensure protection of drinking water, 2) may harm aquatic life over time, 3) threatens to increase the cost of clean water and 4) is likely to cost Pennsylvania's business dependent upon healthy water. In short, it shifts the cost of Mn pollution from the discharger to the public.

However, if the applicability of the Pennsylvania Mn water quality standard is shifted to the point of public water intakes, we support the adoption of a more stringent standard in order to protect aquatic life and human health. Although Mn is naturally occurring, in excess it has been shown to be harmful to brain health and the nervous systems of children and exposed workers, potentially impact fetus development, the placenta and fertility, cause deposition on pipes that requires water utilities to maintain and also settle in sediment where it can be accessible to aquatic life. Without a stronger standard, eliminating the requirement to minimize Mn in discharges leaves streams, and the people and aquatic organisms that use them, insufficiently protected from these potential impacts.

American Rivers continues to believe that shifting the point of compliance for the Mn water quality standard is not in the best interest of DEP, Pennsylvania's businesses, water suppliers and citizens. We request that the DEP reject this change in the point of compliance and focus on implementing water quality criteria for the point of discharge that is appropriately protective of aquatic life and human health for all surface waters.

Sincerely,



Jennifer Adkins  
Director