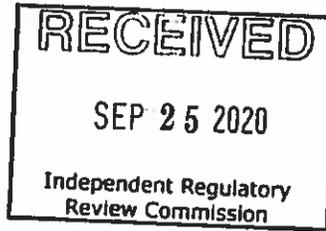


3200

September 25, 2020

Via Email: RegComments@pa.gov

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477



Re: Water Quality Standard for Manganese and Implementation (#7-553)

To Whom It May Concern:

Clean Air Council respectfully submits this comment on the proposed water quality standard for manganese. As a non-profit environmental organization with more than 9,000 members in the region, Clean Air Council works to protect and defend everyone's right to a healthy environment.

Clean Air Council writes to support the proposed water quality standard for manganese of 0.3 mg/l. This more stringent standard is necessary to protect not only human health, but the health of our rivers and aquatic life. The current manganese effluent limit in Pennsylvania of 1.0 mg/l was not designed to be protective of human health, aquatic life, or water supply use.

More importantly, the Council also writes to oppose the proposal to change the point of compliance from the point of discharge to the point of withdrawal for drinking water supplies. The point of compliance for the manganese effluent limit must remain where the pollution occurs – at the point of discharge. This is the only way that Pennsylvania can ensure that streams are clean enough to adequately protect human health and aquatic life.

Manganese is a persistent contaminant that can be carried far downstream. Manganese exposure has been proven to be harmful to human health and aquatic life. Changing the point of compliance to the intake for drinking water supplies would endanger those who use streams for recreation and would threaten the ecological health of our streams. Maintaining the point of compliance at the point of discharge ensures that all waterways are protected from excessive manganese pollution regardless of whether or not a drinking water supply intake is downstream.

Changing the point of compliance to the drinking water supply intake would also inappropriately place the burden of treating manganese pollution on public water suppliers and customers, rather than on the companies discharging into our waterways. The public should not be forced to bear the costs of treating this pollution in order for mining companies to save money on compliance costs.

The Clean Water Act and the Clean Streams Law recognize that the discharger must be responsible for limiting the pollution it dumps into Pennsylvania's waters. Additionally, requiring the new standard to be met at the discharge point protects not only human health, but all of the uses of our streams – from aquatic life and recreation to municipal, industrial, and agricultural uses. Changing the long-standing point of compliance from the discharge point to the intake for potable surface water supplies would undermine critical protections of Pennsylvania's waterways that have been in place for decades.

Pollution from industrial uses such as quarrying and mining activity has historically been detrimental to the health of our waterways in the Delaware River Watershed as well as throughout the Commonwealth. It is critical for the Department of Environmental Protection and the Environmental Quality Board to hold the entities discharging manganese accountable for their pollution, rather than allow them to further harm our waterways and place the additional burden of cost on the public.

In summary, Clean Air Council supports changing the proposed manganese standard to 0.3 mg/l and keeping the point of compliance for this more stringent standard at the point of discharge.

Thank you for your consideration of these comments.

Respectfully submitted,



Joseph Otis Minott, Esq.
Executive Director and Chief Counsel
Clean Air Council
135 South 19th Street, Suite 300
Philadelphia, PA 19103
215.567.4004
joe_minott@cleanair.org