

Stephen Hoffman

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From: ecomment@pa.gov
Sent: Friday, September 25, 2020 3:53 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-jflanagan@pa.gov
Subject: Comment received - Proposed Rulemaking: Water Quality Standards for Manganese and Implementation (#7-553)

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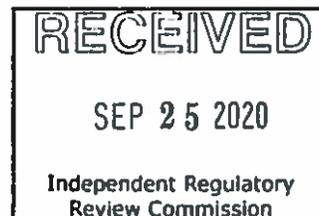


Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Water Quality Standards for Manganese and Implementation (#7-553).

Commenter Information:

Martina M. Jacobs, Ph.D.
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Comments entered:

Dear Ramez Ziadeh, Alexandra Chiaruttini, Joe Adams, John Stefanko, Aneca Atkinson, Krishnan Ramamurthy, Jessica Shirley, and Gregory Kauffman,

I am writing to urge 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.

As you know, 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, it is mandatory that a more stringent manganese water quality standard of 0.3 mg/l and that the discharge point remains the point of compliance for this standard.

Respectfully submitted,

Martina M. Jacobs, Ph.D.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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