

PENNSYLVANIA CAMPAIGN FOR CLEAN WATER

Exceptional Value Workgroup
1315 Walnut Street, Suite 1650
Philadelphia, PA 19107
215-545-5252
215-545-2315 fax



September 25, 2020

Submitted 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:

On behalf of the Pennsylvania Campaign for Clean Water's Exceptional Value Workgroup (CCWEV), we are writing in support of the proposed water quality standard for manganese of 0.3 mg/l. This more stringent standard is necessary and long overdue 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 is not protective of human health, aquatic life, or water supply use.

CCWEV also writes to oppose the alternative proposal being considered to change the point of compliance for manganese from the point of discharge to the point of drinking water intake. 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 our streams and aquatic life are protected.

Manganese is a persistent contaminant that can be carried far downstream. Manganese can cause negative impacts to human health and aquatic life, as well as other uses of water such as for agriculture and recreation. Manganese can be significantly bio-concentrated by aquatic biota at lower trophic levels. A multitude of science and studies have shown the effects of manganese on fish include impaired gill functions and hormonal and metabolic interference. Excess manganese can potentially degrade Exceptional Value and High Quality streams by impairing aquatic life and accumulating on the very substrates where benthic life resides - causing cascading impacts throughout the ecosystem. Oxidized manganese forms tightly bound, dark precipitates on exposed rock surfaces of rivers, impacting aquatic life¹. Since the DEP often uses benthic macroinvertebrate diversity scores and metrics for redesignation petition qualifications, it is absolutely critical manganese never enters the stream in the first place to avoid these harms.

Because of these impacts, changing the point of compliance to the intake for potable water supplies would not protect human health and the environment throughout our freshwater streams. According to PADEP's 2020 Pennsylvania Integrated Water Quality Monitoring and Assessment Report, there are over 5,559 miles of

¹ Wilson, et al. (2019). Manganese oxides as localized drivers of benthic invertebrate density and community structure. *Hydrobiologia* 838:85-98. (<https://doi.org/10.1007/s10750-019-03979-3>)

stream miles impaired for aquatic life due to acid mine drainage (AMD) and another 12 miles are impaired for water supply due to AMD². Adopting the stricter effluent limit for manganese and maintaining the point of discharge compliance ensures that our waters are protected from future degradation and impairment whether or not a drinking water supply is downstream.

Changing the point of compliance would inappropriately place the burden of treating the pollution on the public water systems and the public, rather than with the polluter. The public should not have to be forced to bear the costs of treating this pollution in order to create more profits for the mining industry that has for far too long had too much power over the environment in Pennsylvania. Pennsylvania communities can no longer bare more sacrificed areas and pollution due to these powerful industries of the extraction business that continue to pressure many elected officials to waste time and resources by putting public health at risk as they bend to the polluter's wishes to undermine strong protection laws that have been in place for decades.

The Clean Water Act and the Clean Streams Law recognize that the discharger must be responsible for limiting the pollution it dumps into PA's waters. Additionally, requiring the new standard to be met at the discharge point protects not only human health, but *all* the uses of our streams – from aquatic life and recreation to municipal, industrial, and agricultural uses. A strict manganese standard of 0.3 mg/l at the source of the pollution input is needed now and also complements the Pennsylvania Environmental Rights amendment, Article I, Section 27 of the Pennsylvania Constitution which states:

The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people.

The Pennsylvania Campaign for Clean Water is a coalition of over 180 environmental, conservation, sporting, and religious groups from all corners of the state that speaks in one voice in support of federal and state policies to protect and restore Pennsylvania's water resources. The Exceptional Value workgroup focuses on protection of the Commonwealth's highest quality streams and we regularly meet to discuss and support local watershed petitions, stream redesignations, science and other protective measures being undertaken across the state.

Thank you for your time and consideration of these comments.

Sincerely,



Faith Zerbe
CCW Exceptional Value Co-Chair
Delaware Riverkeeper Network



Eric Harder
CCW Exceptional Value Co-Chair
Youghioghney Riverkeeper

² DEP. 2020 Integrated Report. https://www.depgis.state.pa.us/2020_Integrated_Report/. (accessed Sept 25, 2020.)