

Stephen Hoffman

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From: ecomment@pa.gov
Sent: Friday, September 25, 2020 3:53 PM
To: Environment-Committee@pasenate.com; IRRRC; 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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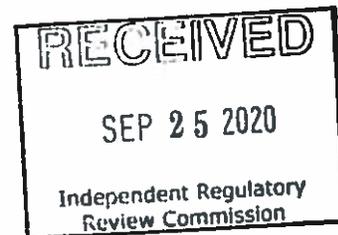


Re: eComment System

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

Commenter Information:

Stephen P. Kunz
(spkunz@aol.com)
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Comments entered:

For more than 40 years now I have been a consulting ecologist working to protect wetlands and water resources. I support the proposal of a new numeric human health criterion for manganese of 0.3 mg/L in Table 5 in Pa. Code § 93.8 and the deletion of the existing 1 mg/L in Table 3 § 93.7 standard. The new numeric for manganese of 0.3 mg/L is a step in the right direction in protecting human health and aquatic life.

The proposed rulemaking takes a positive step in meeting national and international health manganese guidelines. It also runs congruent with environmental statutes such as the Clean Streams Law (CSL) and the Pennsylvania Safe Drinking Water Act. Additionally, the Department of Environmental Protection ("Department") has the duty and authority to implement regulations that would prevent and eliminate water pollution, in this case, manganese.[3]

I also am asking you to maintain the current point of compliance. The discharger of pollution must be responsible for limiting the amount of pollution it dumps into our waterways. Dilution is not the solution for pollution, as I learned in college almost 50 years ago. I find it unconscionable that the mining companies (and other industries) have essentially asked us, the ratepayers, to pay for removing a toxin that they have discharged. If the compliance point and

treatment for manganese shifts to the point of withdrawal, the likelihood of the cost of treatment and technology needed to comply with safe drinking water standards would be passed onto the ratepayer.

Under current regulations, public water systems are to receive raw water at their intake. Only by using conventional treatment can these systems remove residual pollutants. These systems are currently not set up to either endure increased costs for more chemical use or increased cost related to more sensitive technology to remove higher levels of manganese. A municipal water authority treatment plant operating a one million gallons per day would face an additional estimated \$20,000 per year increase in chemical usage to meet manganese compliance levels. To put that into perspective, the Pittsburgh Water and Sewer Authority averages 70 million gallons of water a day, which equates to an increase of \$1.4 million in operating costs. It was also reported in the Board's rulemaking that the City of Lancaster's Department of Public Works and Pennsylvania American Water would incur capital costs upwards of tens of millions of dollars to comply with such a proposal. This cost would be associated with increased needs of chemicals and additives, additional system maintenance, increased sludge removal, flushing and cleaning of the system, and increased compliance monitoring. Thus, allowing upstream polluters to purposefully discharge untreated manganese into our waterways would place an undue burden on water authorities and their ratepayers.

Therefore, I am asking you to adopt the new numeric human health criterion for manganese of 0.3 mg/L in Table 5 in Pa. Code § 93.8 and the deletion of the existing 1 mg/L in Table 3 § 93.7 standard, and to require that the discharge point remain the point of compliance for this standard.

Thank you for your consideration.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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