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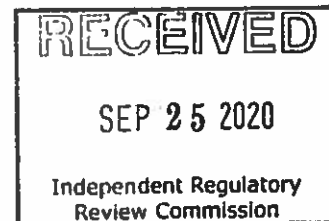


Pennsylvania Council
Trout Unlimited
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September 25, 2020

Sent 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:

Trout Unlimited is writing in support of two items in the proposed regulation concerning the establishment of the modification of the water quality standard for manganese (rulemaking #7-553). These items are: 1) support for lowering the water quality standard for manganese from 1.0 mg/L to 0/3 mg/L, and 2) opposition to moving the point of compliance from the point of discharge to the point of water supply intake.

The current water quality standard of 1.0 mg/L was originally adopted in the 1980s in response to mining discharges causing impacts to streams from untreated manganese. In response, the Pennsylvania Department of Environmental Resources (now Environmental Protection (DEP)) adopted and imposed a 1.0 mg/L on these facilities. This limit was based on a level known to keep residential plumbing fixtures from staining due to manganese; human health and aquatic organism protection were not considered in setting the criterion. With the passage of Act 40 of 2017, DEP conducted review of available scientific literature taking human and aquatic organism protection into account. Based on these data, DEP proposes the criterion of 0.3 mg/L as the appropriate water quality standard that will protect human health in critical populations, such as infants, as well as be protective of aquatic life.

Movement of the point of compliance with a water quality standard from the point of discharge to a stream to the point of public water intake shifts the cost of compliance from the discharger to the downstream users. In addition, it does not provide protection for aquatic life in the length of

water between the discharge point and the point of withdrawal for human consumption. This shift the cost of compliance to the citizens who recreate on and in Commonwealth waters, including numerous small businesses who earn livings centered around outdoor recreation as it effectively writes of appropriate protections for those waters. Further, it also shifts costs to water purveyors, many of which serve small, rural communities located in low income areas, and passes the cost of business compliance on to citizens. Shifting environmental compliance onto ratepayers is unacceptable.

Trout Unlimited appreciates the opportunity to provide comment on this important regulation. Should you have questions, please contact Jennifer Orr-Greene at jen.orr@greene@tu.org or (717)364-4368. Thank you.

Sincerely,



Greg Malaska
Council President
Pa. Trout Unlimited

Jennifer Orr-Greene

Jennifer Orr-Greene
Eastern Policy Director
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