

American Rivers  
Clean Water Supply  
309 3rd St., Suite 1  
New Cumberland, PA 17070

February 22, 2018

Pennsylvania Department of Environmental Protection  
Policy Office  
400 Market St.  
P.O. Box 2063  
Harrisburg, PA 17105-2063

Re: ANPR Water Quality Standard for Manganese; 25 PA Code Chapters 93 & 96

American Rivers believes, consistent with Pennsylvania Clean Streams Law, that in-stream and tap water should be protected and clean. Further, Pennsylvanians expect that public water suppliers are able to deliver clean water equitably and affordably to all citizens. To facilitate water suppliers' ability to meet expectations, discharges to waterways should be protective of the highest standard for human consumption at the point of discharge.

The Pennsylvania Department of Environmental Protection (DEP) is preparing an expedited rulemaking for manganese (Mn) that would eliminate the long-standing requirement for polluters to the state's waterways to maintain a minimum amount of manganese at the point of discharge and instead allow the measurement to occur at the point of downstream public water system withdrawal. This is an irresponsible proposal; one that 1) cannot adequately ensure protection of drinking water, 2) may harm aquatic life over time, 3) threatens to increase the cost of clean water and 4) is likely to cost Pennsylvania's business dependent upon healthy water.

The threat: although Mn is naturally occurring, in excess it has been shown to: be harmful to brain health and the nervous systems of children and exposed workers, potentially impact fetus development, the placenta and fertility, cause deposition on pipes that requires water utilities to maintain and also settle in sediment where it can be accessible to aquatic life.

If the applicability of the Pennsylvania Mn water quality standard is shifted to the point of public water intakes:

- A protective aquatic life standard must be adopted
- The current standard which is for acute exposure must become more protective to address

- Potential fluctuations in measurable Mn since Mn is known to accumulate in sediment and may return to the surface water at times of high flow or when disturbed
- Water quality between the point of discharge and withdrawal. For instance, bottled water manufacturers are held to a more protective standard and may be required to do additional, costly treatment
- The standard must be measured at private, as well as public, drinking water system intake points to avoid the cost burden to these providers
- Permit writers must be aware of and responsive to cumulative impacts and the association of Mn to other pollutants such as iron
- The cost of additional maintenance to the pipe systems of water providers must be valued in contrast to the reduced responsibility of the polluter.

American Rivers believe the proposed change to the Mn water quality standard is not in the best interest of DEP, Pennsylvania's businesses, water suppliers throughout Pennsylvania and the citizens of the commonwealth. We request that Dep shift its energy toward adoption of an aquatic standard and a more protective point of discharge standard.

Sincerely,

A handwritten signature in black ink that reads "Liz G. Deardorff". The signature is written in a cursive style and is contained within a thin black rectangular border.

Liz Deardorff  
Director, Clean Water Supply