

MANGANESE

Act 40 of 2017 directed the Environmental Quality Board to propose a regulation that moves the point of compliance for manganese from the point of discharge to any downstream public water supply intake. In what seems like a retaliation response, the PA Department of Environmental Protection (DEP) has proposed a rulemaking package to amend Chapters 93 and 96 moving manganese to a toxic substance, lowering the manganese standard from 1 mg/l to 0.3 mg/l, and proposing two alternatives for the point of compliance—one per the direction of Act 40 and the other to the point of discharge.

- Manganese is one of the most common elements found in the earth's crust. It is a trace mineral found in the body and is **essential** for cartilage and bone formation and bone health in general. In some locations throughout the Commonwealth, ambient **background** levels of manganese are higher than the proposed limit.
- PA DEP's proposed ambient water quality criteria limit of 0.3 milligrams per liter is overly conservative and is based on outdated science and an inappropriate, random modification factor of 3. DEP has no toxicologists on staff and their proposal glosses over the current science on how manganese is taken up, absorbed and utilized in humans.
- Manganese removal is a complex juggling of constituent treatment management when paired with having to comply with pH, total suspended solids and aluminum limits as well. Additionally, the cost of manganese removal is high compared to any environmental benefit. There may be challenges with space limitations, chemical dosage quirks, sludge handling and additional personnel costs.
- PA DEP already has the regulatory tools to manage specific facility challenges with manganese. There is no need to spend taxpayer dollars on an issue with no risk or benefit to the public.
- We oppose changing the current limit and support the point of compliance as being at the intake to the first downstream public water supply, per Act 40 of 2017.