



Pennsylvania Aggregates and Concrete Association

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September 19, 2022

Chairman George D. Bedwick
Independent Regulatory Review Commission
333 Market Street
Harrisburg, PA 17101

**RE: Regulation #7-553: Water Quality Standard for Manganese and Implementation
IRRC No. 3260**

Dear Chairman Bedwick and Commissioners:

We are requesting your disapproval of Regulation #7-553: Water Quality Standard for Manganese and Implementation, IRRC No. 3260, because it blatantly disregards the intent of Act 40 of 2017, is discriminatory in its application to only “permitted” discharges, violates the PA Constitution’s Article 1, Section 27 [right to clean water] by shielding the PA Department of Environmental Protection from their duty to ensure clean water for all Pennsylvanians, and fails to meet the test for scientific, acceptable data.

Background

PACA (Pennsylvania Aggregates and Concrete Association) is the trade organization for the aggregates (crushed stone, sand and gravel), ready mixed concrete and cement companies in Pennsylvania. Over 175 member companies across the Commonwealth, of all sizes and types, are involved in the production of the above commodities or provide support products and services to the construction materials manufacturing companies. These companies have been actively and positively involved for more than 100 years in helping to provide sustainable jobs and tax revenue in the counties in which they operate.

The proposed rulemaking will affect the aggregates portion of our industry, as the quarry (noncoal) NPDES permits need to comply with water quality standards. Ensuring a sustainable supply of aggregates resources requires advance planning and balancing a complex matrix of engineering, geographical and geological variables, and community considerations. Pennsylvania is consistently in the top five states nationwide in production of crushed stone, with one member Pennsylvania company individually ranked 11th in the nation in production. We cannot neglect the strategic importance of cultivating our own natural resources, particularly considering the billions of federal dollars earmarked for the building of roads and bridges in Pennsylvania through the Bipartisan Infrastructure Law.

We appreciate your consideration of our comments.

Sincerely,



Building and Connecting Communities

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A handwritten signature in black ink, appearing to read "Peter T. Vlahos". The signature is stylized and written over a white background.

Peter T. Vlahos
President & CEO

cc: Ramez Ziadeh, P.E. - PA DEP Acting Secretary



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