TESTIMONY

of

DARREL K. LEWIS, SNYDER ASSOCIATED COMPANIES, INC.

before the

SENATE ENVIRONMENTAL, ENERGY & RESOURCES COMMITTEE MEETING

SEPTEMBER 9, 2020

Good morning. My name is Darrel K. Lewis, and I am the chief engineer of Snyder Associated Companies, Inc. A subsidiary company, Allegheny Mineral Corporation (AMC) was founded in 1953 by the Snyder family as a limestone producer and remains a respected member of the communities we serve. AMC continues to operate today, as a licensed industrial mineral and coal operator located in Kittanning with operations in Armstrong, Butler, Clarion and Lawrence counties in western Pennsylvania. We work, live and pay taxes in these communities.

AMC is objecting to the reduction of the manganese concentration from 1.0 mg/L to 0.3 mg/L for all NPDES discharges. We also suggest the point of measurement should be located at the point of withdrawal for public water supplies. AMC also believes that a more comprehensive and appropriate health study should be completed to determine if manganese concentrations above 0.3 mg/L are actually a health risk to the citizens of the Commonwealth. A literature search with data from other countries that have a very different lifestyle than we in the United States is not an appropriate study format. The studies that were previously completed are not appropriately conclusive and should be redone with up-to-date, comprehensive scientific literature for the United States, and completed by a qualified, degreed toxicologist.

Our operations involve the mining of the Vanport Limestone, which is found in the geology of western Pennsylvania that contains many coal seams and carbonaceous shales in the overburden.

In order to surface mine the Vanport Limestone, the overburden located above it has to be removed. This overburden, depending upon the distance above the limestone, may contain one or more coal seams and carbonaceous shales. Depending

upon the thickness of the coal seam, surface and/or underground mining of the coal may have previously occurred. And on these particular types of sites with this type of geology, certain past practices may have lead to discharges that have background manganese concentrations greater than 0.3 mg/L in the groundwater and/or surface waters. This may be true of other watersheds where the Vanport Limestone is present in western Pennsylvania.

AMC has several permitted operations where the upstream sampling point above our NPDES discharge point has a manganese level greater than 0.3 mg/L. Even with these higher background levels, there is no evidence of impairment from manganese at the downstream water intakes. Furthermore, the majority of the streams surrounding our limestone mines are of high or exceptional value designations. It is difficult to comprehend how that could be, if the manganese levels are causing a challenge.

For our operations, the proposed regulatory reduction could potentially require a larger treatment system than we have, which would require more area to construct facilities. This would be a major problem at sites with size constraints.

Additionally, we project our current active chemical treatment cost will triple with this new regulation. Because limestone may have a higher pH, we treat to keep the pH between 6 and 9. We also may treat for aluminum. Chemical treatment is a complicated process. We would need to raise the pH to a level at or above 9.0 to cause the manganese concentration to drop out of solution, then we would need to readjust to treat for aluminum and readjust further to drop below 9.0 to discharge at our permit limit of between 6 and 9.

Furthermore, staying within our permit limits are extremely important to us as a company. We would not just be treating down to a 0.3 mg/L, but because of the complex treatment process and the need to assure we do not violate our permit conditions, we would need to treat down to a 0.15 mg/L in order to insure an overall average concentration of 0.3 mg/l. This will incur more costly treatment and possibly additional personnel to carry out this complex treatment process.

Alternately, while in certain situations, manganese could possibly be passively treated with large-area facilities, and while this may work at some future sites, our existing operations simply do not have the room or suitable terrain for this type of treatment. Our current mine sites are slated for up to a 50-year life with an average of 30 plus years. It is not an easy or feasible task to obtain additional land for treatment facilities.

Aggregate availability of high-quality stone is a challenge for the industry and future remining in areas where manganese levels may exceed 0.3 mg/L may cause high quality stone to not be pursued as aggressively as in the past, potentially raising the cost of the stone.

Thank you for the opportunity to be heard and I can take any questions you may have.