Pesticide: 2,2-Dibromo-3-Nitrilopropionamide (DBNPA); EPA-HQ-OPP-2009-0724

Use: Water treatment, paper production, and as a materials preservative in paints and cleaners

Why we care: Highly toxic to aquatic organisms
Actions taken: No previous actions on this pesticide.

Status: EPA released the Draft Risk Assessment in November 2019.

Comment period or Workplan (2010)

Comment period or Draft Environmenta Risk Assessment (due Jan 17, 2020)

Comment period on Proposed Interim
Decision

EPA analyzes comments, issues Final Interim Decision

Endangered Species
Act (ESA)
Consultation
(Not in EPA workplan)

EPA issues Final Decision

Next steps: EPA will issue a Proposed Interim Decision.

Recommendation: Submit a letter to request that EPA include a robust analysis of the major degradates of DBNPA, including DBAA.

From EPA's Draft Risk Assessment:

"DBNPA is highly toxic to aquatic organisms. However, based on DBNPA's rapid degradation, little exposure in the aquatic environment is anticipated and minimal risks are expected from parent DBNPA...DBNPA degrades to several compounds (DBAN, DBAA) that are likely to be toxic. The Agency does not possess environmental fate data or toxicity data to quantify potential exposure and toxicity of the degradates and cannot rule out potential risk from exposure to the degradates."

Response from a POTW Perspective:

EPA did not evaluate the environmental fate of aquatic toxicity of the major degradates of DBNPA. Since DBNPA degrades rapidly in aquatic environments, it is important that these degradates be considered, including DBAA which has been found in the Sacramento River.