

**Pesticide:** Copper Compounds; EPA-HQ-OPP-2010-0212

**Use:** Swimming pool treatments and other various conventional and antimicrobial uses

**Why we care:** San Francisco Bay has a site-specific copper objective and management program that requires continued pollution prevention activity; swimming pool discharges need management to prevent overcharging collection systems lines

**Actions taken:** CASQA, the National Municipal Stormwater Alliance and the SF Water Board sent EPA comment letters on the Proposed Interim Decision in July 2017 (BACWA/NACWA determined letters were unnecessary). CASQA, the SF Water Board, BACWA, and NACWA sent comments on the Draft Risk Assessment in 2016. CASQA, the SF Water Board, and Tri-TAC sent letters commenting on Registration Review in 2010. CASQA sent a letter on the Risk Assessment and Risk Reduction Options and an additional letter on Reregistration Eligibility in 2006.

**Status:** EPA released the Interim Registration Review Decision in December 2018.



**Next steps:** ESA Consultation is required but unlikely to begin before 2022. Then EPA will issue a Final Decision.

**Recommendation:** No action is needed at this time. Keep on tracking list and watch for future ESA consultation process.

Comments to EPA	EPA Response	Did EPA incorporate comment?
<p>SF Water Board Comment: We concur with OPP's findings that the use of copper-based pesticide products in pools and spas may pose a significant threat to organisms in the aquatic environment. We support EPA's proposal to include label language first developed for lithium hypochlorite:</p> <p><i>"Before draining a treated pool, spa, or hot tub, contact your local sanitary sewer and storm drain authorities and follow their discharge instructions. Do not discharge treated pool or spa water to any location that flows to a gutter or storm drain or natural water body unless discharge is allowed by state and local authorities."</i></p>	<p>EPA is moving forward with the expansion of pool, hot tub, and spa discharge language to include outdoor fountains. Final language:</p> <p><i>"Before draining a treated [pool,] [spa,] [hot tub,] or [fountain] contact your local sanitary sewer and storm drain authorities and follow their discharge instructions. Do not discharge treated pool or spa water to any location that flows to a gutter, storm drain or natural water body unless discharge is allowed by state and local authorities."</i></p>	<b>YES</b>
<p>SF Water Board Comment: We request that EPA also require the pool and spa draining language be placed on labels for copper products sold for use in outdoor fountains, for same reasons that EPA has required this language for pool products.</p>	<p>The Agency thanks CASQA, NMSA and SFBRWQCB for their comments and support for proposed label</p>	<b>YES</b>

As with pools and spas, fountains are also be drained regularly for maintenance, with potential adverse water quality consequences similar to those associated with draining pools and spas.	language for swimming pools, hot tubs, and spas.	
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