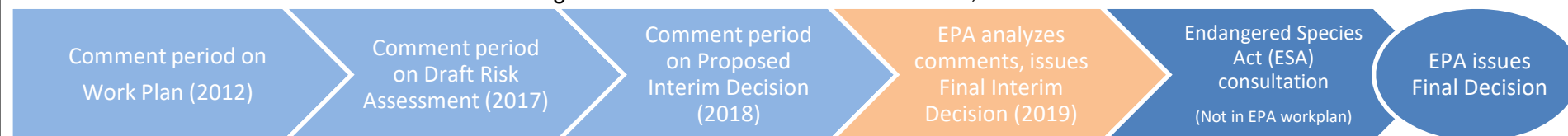


Pesticide: Dichlobenil EPA-HQ-OPP-2012-0395
Use: Root control in sewer lines (almost 94% of use is root control)
Why we care: Dichlobenil is an important root control chemical, but it also can negatively impact wastewater collection system workers, POTW treatment processes, and receiving waters.
Actions taken: BACWA, NACWA, Tri-TAC, CASQA, and SF Bay Water Board commented on the Work Plan in 2012. BACWA, NACWA, CASQA, and SF Bay Water Board commented on the Draft Risk Assessment in 2017. BACWA sent EPA comments on the Proposed Interim Decision on October 9, 2018.
Status: EPA released the Final Interim Registration Review Decision in March 18, 2019.



Next steps: ESA consultation is required but unlikely to begin before 2022.

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

BACWA Comments to EPA	EPA Response	Did EPA incorporate BACWA's comment?
Prior versions of the label language did not have any notification for downstream POTWs. BACWA appreciates that the proposed decision includes a requirement to notify downstream POTWs about impending dichlobenil applications, supports the requirements to inform the POTW of the quantity to be applied (essential for protection of POTW operations) and to notify POTWs about dichlobenil's process interference hazard, as some POTWs may not be aware of this risk.	In the Proposed Interim Registration Review Decision, EPA added notification of downstream POTWs to the label language.	YES
A minimum of 24 hours between notification and the start of dichlobenil application is essential to provide POTWs with the time necessary to provide worker safety and operational protections.	BACWA's comment was incorporated by EPA in the Final Interim Decision: <i>"Based on comments received on the PID [proposed interim decision], the Agency is amending the POTW (publicly owned treatment works) notification language to require that POTW notifications take place 24 hours prior to the start of dichlobenil application."</i> (p.4)	YES
Due to the health risks associated with direct exposure to dichlobenil treatment solutions, it is imperative that workers do not open and enter manholes in areas undergoing treatment. Treatment zones are so	The Final Interim Decision did not contain label updates that mentioned worker safety and the need to restrict workers from entering	NO

long that the root control chemical applicator is unable to view all manholes affected by the treatment, so it is not possible to guarantee worker safety through visual measures alone. Due to the paramount importance of workers' safety, BACWA urged EPA to ensure that the label mentions the need to restrict workers from entering manholes and the collection system in and downstream from treatment areas.

the collection system downstream of the application of dichlobenil.