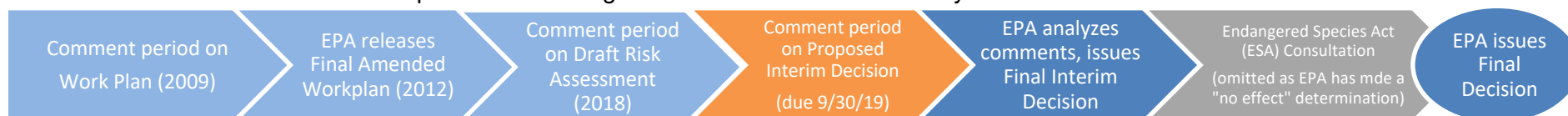


Pesticide: Zinc and Zinc Salts; EPA-HQ-OPP-2009-0011
Use: Swimming pool algicide.
Why we care: Highly toxic to aquatic invertebrates. CWA Priority Pollutant.
Actions taken: BACWA has been tracking EPA actions on this pesticide since 2009. BACWA sent a comment letter on the Draft Risk Assessment to EPA in January 2019.
Status: EPA released the Proposed Interim Registration Review Decision in July 2019.



Next steps: EPA will analyze comments and issue a Final Interim Decision. No ESA consultation is planned as EPA made a “no effect” determination.

Recommendation: Submit comments thanking EPA for incorporating BACWA’s suggested label changes.

BACWA Comments to EPA	EPA Response	Did EPA incorporate BACWA’s comment?
<p>BACWA requests that the current language be changed to match the lithium hypochlorite label, which would also provide consistent label language across pool, spa, and hot tub chemicals.</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><i>Due to the scenarios outlined in these public comments, the requested label language has been added as a proposed requirement...these proposed changes are addressed in Appendix A of this document. The Agency thanks the submitters for their comments.</i></p> <p><i>From Appendix A: “Discharge Directions for [Commercial] and [Residential] [Pool,] [Spa,] and [Hot Tub] Uses 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,] [spa,] or [hot tub] 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>	<p>YES</p>

For all swimming pool, spa, and hot tub products including those containing zinc and zinc salts, we also recommend that the “Environmental Hazards” label statements be applied on the basis of product end use rather than product size. This would mimic EPA’s decision for lithium hypochlorite products. As explained in our attached lithium hypochlorite comments, this approach avoids potential conflicting language on product labels.	<i>The requested changes to the uses triggering NPDES permit language have been considered by the Agency and are included as a proposed requirement.</i>	YES
EPA assumes that the discharges of zinc-containing pool water would create “no major risk issues.” BACWA noted that it only takes the discharge of one zinc-containing swimming pool to exceed water quality standards of zinc during low creek flow conditions (which occur during dry weather, the preferred time for pool maintenance).	EPA did not re-evaluate water quality risks in the Proposed Interim Decision.	NO

