

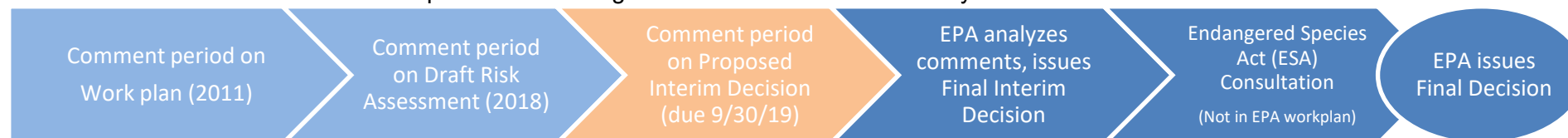
Pesticide: o-Benzyl-p-chlorophenol (OBPCP); EPA-HQ-OPP-2011-0423

Use: Biocide for industrial process water and cooling systems, as well as a hard surface and floor disinfectant. Also used on food handling surfaces and equipment, and indoor whirlpool spas.

Why we care: Highly toxic to aquatic invertebrates.

Actions taken: BACWA has tracked this pesticide since the Work Plan was released in 2011. BACWA made a decision to not comment on the Draft Risk Assessment (even though it noted some shortcomings in methodology) since 1) this pesticide is not a high priority for BACWA and 2) the EPA had found significant risk in the Draft Risk Assessment due to cooling tower uses and would already be considering mitigation measures.

Status: EPA released the Proposed Interim Registration Review Decision in July 2019.



Next steps: EPA will analyze comments and issue a Final Interim Decision.

Recommendation: A response letter is not recommended. No action is needed at this time. Keep on tracking list and watch for future ESA consultation process.

From EPA's Proposed Interim Registration Review Decision:	Response from a POTW Perspective:
<p>Mitigation- EPA has proposed the following label changes for OBPCP:</p> <ul style="list-style-type: none"> -<i>"The amount of product required will depend on the nature and extent of contamination, quality of the makeup water, and the degree of control required."</i> -<i>Limit use of maintenance treatment of the intermittent or slug method to: "Not to exceed two doses in 24 hours."</i> -<i>"Not for use in industrial once-through cooling water systems."</i> -<i>"This product must not be used in cooling towers with capacities greater than 2 million gallons or 50,000 GPM recirculation rate."</i> -<i>"Applicators must develop a system management plan for achieving control of fouling with the minimum amount of product required. Contact your distributor for assistance in developing a system management plan."</i> -<i>"Badly fouled systems must be cleaned before treatment is begun."</i> <p>(Proposed Interim Registration Review Decision, p. 15)</p>	<p>While EPA is proposing label improvements, it is unknown the extent to which these changes will reduce the amount of OBPCP entering the sewer system. The suggested mitigations are also only limited to cooling towers and process water. There are no mitigations proposed for other uses such as laundry additives or floor cleaners. EPA does not state if any modeling was done to come up with the cooling tower mitigation measures, only that they met with the registrants to discuss and agree upon mitigation measures.</p>

(EPA is also proposing changes with regards to food contact use sites, to revise the tolerance levels. This will be done through a separate process.)	
---	--