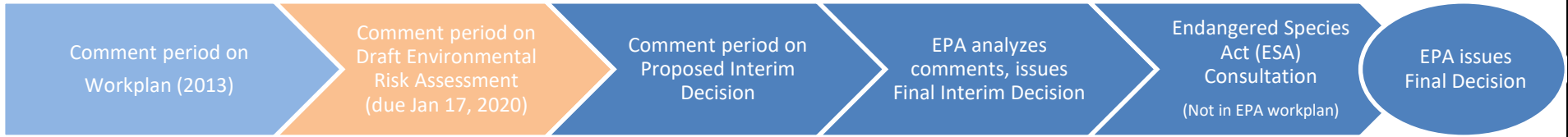
Pesticide: **Ortho-Phenylphenol (O-PP);** EPA-HQ-OPP-2013-0524
Use: Cooling tower product, wood preservative, paint additive, disinfectant, sanitizer, cleaner
Why we care: Toxic to invertebrates
Actions taken: BACWA has tracked this pesticide since the Work Plan was released in 2013.
Status: EPA released the Draft Risk Assessment in December 2019.



Next steps: EPA will issue a Proposed Interim Decision.
Recommendation: Submit a letter to explain that the dilution that EPA estimated does not account for seasonal changes and to request that EPA consider cumulative effects of this pesticide, instead of just one of its uses.

From EPA's Draft Risk Assessment:	**Response from a POTW Perspective:**
EPA performed a Down-the-Drain (DtD) assessment for the use of O-PP in cooling towers. EPA concluded that 85%-100% of O-PP that enters a wastewater treatment plant (WWTP) will be discharged from the WWTP. To be conservative, they modeled 100% of O-PP being discharged from the WWTP. (pp.75-76) EPA concluded that even though other uses of O-PP (antimicrobial, medical, residential, etc.) are used at higher rates, they would not be used in the same quaintly as cooling tower use, and thus did not warrant inclusion in the DtD model.	The DtD modeling should include all indoor uses of O-PP that have pathways to the sewer, and thus the WWTP.
"…O-PP is moderately toxic to most of the tested nontarget aquatic organisms. The only exceptions were the estuarine and marine fish and invertebrates which were highly toxic to O-PP." (p.81) "(S)creening level estimates indicate risk, however, it would be assumed that O-PP would be diluted rapidly once it entered the streams and since the chemical is only moderately toxic to aquatic organisms, the potential risk to nontarget aquatic organisms would be considered minimal." (p. 10)	EPA's assumption is likely not accurate for many WWTPs as cooling towers may perform more frequent "blowdown" during warmer weather, when there is much less dilution of WWTP discharge into discharge waters. During these periods of low dilution and high cooling tower blowdown, the potential risk to aquatic organisms could be greater than estimated by EPA.