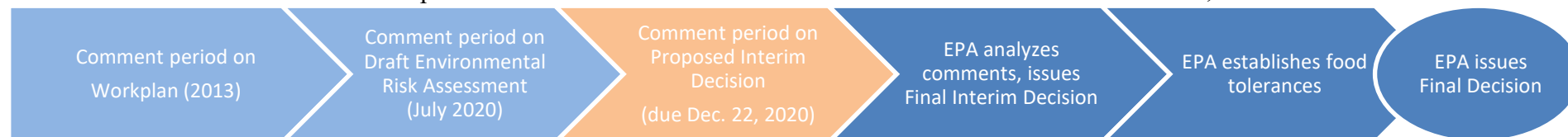


Pesticide: Halohydantoins EPA–HQ–OPP–2013–0220
Use: Swimming pool, spa, hot tub, and fountain disinfectant.
Why we care: Degradants are toxic to aquatic organisms.
Actions taken: BACWA sent EPA a comment letter on the Preliminary Risk Assessment on July 6, 2020.
Status: EPA released the Proposed Interim Decision in October 2020. Comments are due December 22, 2020.



Next steps: EPA will issue a Final Interim Decision.

Recommendation: Submit a letter to thank EPA for incorporating proposed label language.

BACWA 07/06/2020 Comments to EPA	EPA Response	Did EPA incorporate BACWA's comment?
<p>BACWA Requests Revised Labeling as a Mitigation Measure- BACWA requests that the current halohydantoins label language for any pool, spa, hot tub, and fountain products be changed to match the lithium hypochlorite and copper compounds labels, which would also provide consistent label language across pool, spa, hot tub, and fountain chemicals.</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 or storm drain or natural water body unless discharge is allowed by state and local authorities.”</i></p>	<p>EPA included the revised language in its proposed labeling changes:</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], [spa], [hot tub], or [fountain] 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>	Yes.
<p>For all swimming pool, spa, hot tub, and fountain products, including those containing halohydantoins, 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 and copper products. As explained in our attached lithium hypochlorite comments, this approach avoids potential conflicting language on product labels.</p>	None.	No.