



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

**Recommendation:** No action needed at this time.

BACWA May 2021 Comments to EPA	EPA Response in Interim Decision	Did EPA consider BACWA's comment?
<p><b>BACWA Supports Consistent Labeling to Ensure Consultation with Local Authorities:</b> Existing polixetonium chloride (Busan 77)-containing swimming pool, spa, hot tub, and fountain product labels do not include “Directions for Use” language regarding the draining of a pool, spa, hot tub, or fountain. EPA has proposed the following language for all products used to treat commercial and residential pools, spas, hot tubs, and fountains:</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, storm drain or natural water body unless discharge is allowed by state and local authorities.”</i></p>	<p>“The EPA thanks the Bay Area Clean Water Agencies and the San Francisco Bay Regional Water Quality Control Board for their comments and continued input throughout the registration review process. The recommended language will be added to the appropriate polixetonium chloride labels. Additional information related to the label language can be found in Appendix B.” (ID, p.7)</p> <p><i>From Appendix B: “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.” (ID, p.19)</i></p>	<p>Yes.</p>