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July 6, 2020

Rame Cromwell
Office of Pesticide Programs (OPP)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW.
Washington, DC 20460-0001
Submitted via www.regulations.gov

RE: Terbutylazine Registration Review – Proposed Interim Decision (Docket ID No. EPA-HQ-OPP-2010-0453)

Dear Mr. Cromwell:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the Registration Review – Proposed Interim Decision for terbutylazine, an algaecide and antimicrobial used in fountains. NACWA represents the interests of over 300 publicly owned wastewater treatment agencies nationwide, serving the majority of the sewered population in the US. Many NACWA members also provide stormwater services for their communities.

NACWA is interested in pesticides used in fountains and swimming pools because they may be periodically drained to municipal separate storm sewer systems (MS4s), to sanitary sewers leading to publicly owned treatment works (POTWs), or to surrounding landscaped areas. Discharges to MS4s typically flow without treatment directly to creeks, and very little dilution may be available in dry weather for some creeks. POTWs are not specifically designed to treat pesticides, and some antimicrobials could potentially interfere with the biological processes used to treat wastewater. While MS4s and POTWs may have the ability to work with public and commercial fountain and swimming pool operators to control pool drainage practices, it is difficult for MS4s and POTWs to regulate the frequency, volume, and constituents of discharges from the millions of residential pools in the US.

Existing terbutylazine-containing fountain product labels do not include “Directions for Use” language regarding the draining of a fountain. NACWA supports EPA’s proposed language for all products used to treat commercial and residential pools and fountains:

“Before draining a treated fountain, contact your local sanitary sewer and storm drain authorities and follow their discharge instructions. Do not discharge treated 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.”

This type of communication is a significant means for avoiding ecological risks. It is important to inform users of their obligations to ensure that discharge of treated water does not harm aquatic ecosystems or cause sewer line backups.

Thank you for your consideration of these comments. Please contact me at 202-533-1836 or cfinley@nacwa.org if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Cynthia A. Finley". The signature is written in a cursive style with a large initial 'C' and 'F'.

Cynthia A. Finley, Ph.D.
Director, Regulatory Affairs