



1816 Jefferson Place NW
Washington DC 20036

T (202) 833-2672
F (888) 267-9505
www.nacwa.org

October 9, 2018

Linsey Walsh
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20460
Via www.regulations.gov

Re: Docket No. EPA-HQ-OPP-2012-0395, Dichlobenil, Proposed Interim Registration Review Decision

Dear Ms. Walsh:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the registration review for the herbicide and root control chemical dichlobenil (82 *Fed. Reg.* 43006; September 13, 2017). NACWA represents the interests of over 300 of the nation's publicly owned wastewater treatment agencies, serving the majority of the sewered population in the United States.

NACWA is interested in the registration review for dichlobenil given its use as an effective root control chemical in wastewater collection systems. Roots intruding into wastewater collection systems are a leading cause of blockages, which can cause untreated wastewater to spill out of the collection system. Controlling roots helps prevent these backups and protect water quality. Dichlobenil is an effective root control chemical, but excess use of the chemical in a short time period may adversely affect wastewater effluent quality and could pose a hazard to collection system workers, as EPA noted in its proposed decision.

NACWA appreciates that EPA's proposed decision includes a requirement to notify downstream publicly owned treatment works (POTWs) prior to dichlobenil application. However, NACWA requests that the proposed language be modified to require POTW notification at least 24 hours prior to application and to specifically address worker safety. The proposed language requiring notification "prior to the start of dichlobenil applications," without a specified time for advance notice, means that POTWs could have very short notice and workers could already be in the collection system when the application occurs. Labels for other root control pesticides, such as diquat dibromide, will soon require 24-hour advance notification to downstream POTWs.

To further ensure worker safety, NACWA also asks that the label explain the need to restrict workers from entering manholes and the collection system in and downstream from treatment

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areas. NACWA supports the language suggested by the Bay Area Clean Water Agencies (BACWA) to address the 24-hour notification and worker restrictions.

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

Sincerely,

A handwritten signature in cursive script that reads "Cynthia A. Finley".

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