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January 17, 2020

Erin Dandridge
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20460
Submitted via www.regulations.gov

**Re: Docket ID EPA-HQ-OPP-2009-0168, Draft Risk Assessment of Inorganic
Halides, including Sodium Bromide**

Dear Ms. Dandridge:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the Draft Risk Assessment for inorganic halides, including sodium bromide (84 *Fed. Reg.* 63649). NACWA represents the interests of over 300 of the nation's publicly owned wastewater treatment agencies, serving the majority of the sewered population. Many NACWA members also provide stormwater services for their communities. NACWA's members continue to face challenges as they strive to meet increasingly stringent Clean Water Act (CWA) requirements while having limited control over the toxic pollutants and other substances in the wastewater and stormwater they treat. In addition to the comments below, NACWA also supports the more detailed comments of the Bay Area Clean Water Agencies (BACWA).

NACWA is concerned that the Draft Risk Assessment for inorganic halides did not examine the risks associated with discharges of swimming pool water treated with sodium bromide. Sodium bromide is used in conjunction with activators like chlorine and sodium hypochlorite that react with the dissociated bromine ion to form hypobromous acid, which exhibits pesticidal activity. In the presence of sunlight, as in outdoor swimming pools, the more toxic bromate ion also forms.

Swimming pools chemicals affect clean water agencies because pools 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. MS4s and POTWs are not specifically designed to treat pesticides, and some antimicrobials could potentially interfere with the biological processes used to treat wastewater. In addition, high-rate pool discharges can lead to sewer back-ups, potentially causing untreated wastewater to spill into streets, storm drains, or basements. Maintaining low discharge

flow rates prevents these problems. While MS4s and POTWs may have the ability to work with public and commercial 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 U.S.

NACWA requests that the drainage location and flow rates for pools, spas, and hot tubs be considered in the risk presented by sodium bromide, and that improved labels for sodium bromide follow the precedent set with lithium hypochlorite, as follows:

“Before draining a treated pool, spa, or hot tub, 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 approved by state and local authorities.”

NACWA recommends that this language be used for all swimming pool, spa, and hot tub products so that a consistent message is delivered regarding drainage.

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, reading "Cynthia A. Finley". The signature is written in a cursive, flowing style.

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