



June 27, 2022

Ben Tweed, tweed.benjamin@epa.gov
Erin Dandridge, dandridge.erin@epa.gov
Office of Pesticide Programs (OPP)
c/o Regulatory Public Docket Center (28221T)
U.S. Environmental Protection Agency (EPA)
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

**Subject: Folpet Registration Review – Proposed Interim Decision
(Docket ID No. EPA-HQ-OPP-2012-0859)**

Dear Mr. Tweed and Ms. Dandridge:

On behalf of the Bay Area Clean Water Agencies (BACWA), we thank you for the opportunity to comment on the Folpet Proposed Interim Decision, which covers products used as material preservatives in indoor environments including paints, coatings, adhesives, sealants, carpets, and plastics. BACWA's members include 55 publicly owned wastewater treatment facilities and collection system agencies serving 7.1 million San Francisco Bay Area residents. We take our responsibilities for safeguarding receiving waters seriously.

In the "Folpet: Draft Ecological Risk Assessment for Registration Review" (dated June 18, 2020) EPA stated that "folpet is highly toxic to freshwater and estuarine/marine fish and aquatic invertebrates." [p.8] This letter is in support of EPA's proposed mitigations that are intended to reduce the use of folpet [PID, pp. 21-26], which are in turn expected to result in reduced risks of exposure to non-target aquatic organisms in downstream surface waters.

BACWA Supports Mitigations Outlined in EPA's Folpet PID

BACWA supports the mitigations outlined in the folpet PID [PID, pp. 21-26] including:

- Deletion of use of folpet in paints
- Deletion of use of folpet in carpet fibers

Thank you for your consideration of our comments. If you have any questions, please contact BACWA's Project Managers:

Karin North
City of Palo Alto
(650) 329-2104
Karin.north@cityofpaloalto.org

Robert Wilson
City of Santa Rosa
(707) 543-4369
rwilson@srcity.org

Respectfully Submitted,



Lorien Fono, Ph.D., P.E.
Executive Director
Bay Area Clean Water Agencies

cc: He Zhong, Environmental Risk Branch 1, EFED
A’ja V. Duncan, Environmental Risk Branch 1, EFED
Sophia Hu, Environmental Risk Branch 1, EFED
Kathryn Korthauer, Environmental Risk Branch 1, EFED
Sujatha Sankula, Environmental Risk Branch 1, EFED
Gregory Orrick, Environmental Risk Branch 1, EFED
Frank Farruggia, Environmental Risk Branch 1, EFED
Faruque Khan, Environmental Risk Branch 1, EFED
Melissa Panger, Risk Asses. and Science Support Branch, Antimicrobials
Kelly Sherman, Risk Management and Implementation Branch 3
Matthew Manupella, Reevaluation Branch, Antimicrobials
Jose Gayoso, Reevaluation Branch, Antimicrobials
Melissa Grable, Reevaluation Branch, Antimicrobials
Luisa Samalot, Reevaluation Branch, Antimicrobials
Edward Messina, Director, EPA OPP
Andrew Sawyers, Director, EPA Office of Water, Office of Wastewater Management
Tomas Torres, Director, Water Division, EPA Region 9
Patti TenBrook, EPA Region 9
Rochelle Cameron, EPA Region 9
Karen Mogus, Deputy Director, California SWRCB
Philip Crader, Assistant Deputy Director, California SWRCB
Rich Breuer, California SWRCB
Tom Mumley, California RWQCB SF Bay Region
Alessandra Moyer, California RWQCB, SF Bay Region
James Parrish, California RWQCB, SF Bay Region
Rebecca Nordenholt, California RWQCB, SF Bay Region
Jennifer Teerlink, California Department of Pesticide Regulation
Mason Zoerner, California Department of Pesticide Regulation
Chris Hornback, Chief Technical Officer, National Association of Clean Water Agencies
Cynthia Finley, Director, Reg. Affairs, National Association of Clean Water Agencies
BACWA Executive Board
BACWA Pesticides Workgroup