



Regulatory Alert

**TO: AWWA Leadership
All Utilities**

FROM: Jack W. Hoffbuhr

DATE: March 20, 2006

Who:	Utility Members
What:	Comment on Copper's Risk Assessment (Docket ID: EPA-HQ-OPP-2005-0558)
When:	By March 27, 2006

On January 25, 2006 (71 [Federal Register](#) 4133), EPA's Office of Pesticides requested comment on its preliminary Copper's Risk Assessment. This risk assessment is the last step prior to EPA re-registering copper pesticides and herbicides (e.g., copper herbicides like copper sulfate). It is very important that EPA understand the critical role copper herbicides play in managing algae and aquatic plants in drinking water supplies. To effectively make this point, the American Water Works Association (AWWA) is asking its members that use copper pesticides to submit comment to this docket.

The following are key points in AWWA's comments that individual utilities could reinforce

1. Copper herbicides are essential for a safe, aesthetically acceptable drinking water supply.
2. Drinking water utilities currently rely on copper pesticides for algae and macrophyte control. There are not any proven alternatives to copper pesticides that will address all of the situations that copper products are now used to address.
3. Copper sulfate (e.g., copper pentahydrate) is a critical form of copper for the management of drinking water supplies. Other formulations of copper, alternative pesticides, and alternative management strategies are not as effective as copper sulfate in all waters and applications.
4. Copper application rates should be in keeping with current manufacturer guidance as to use rate, application strategy, etc.

It would also be useful to include utility specific information on copper product application, including: why they are applied (e.g., filtration performance, control taste and odor), which products are used, how determination to apply is made, and typical application rates and frequencies.

Comments should be submitted to:

Public Information and Records Integrity Branch
Office of Pesticide Programs (7502C)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-0001

Attention: Docket ID Number EPA-HQ-OPP-2005-0558

Electronic submission is through www.regulations.gov website. To ensure timely attention to your comments, carbon copy the EPA technical contact for this notice, Rosanna Louie (louie.rosanna@epa.gov).

If you have any questions regarding this docket, please contact the AWWA Government Affairs Office at (202)-628-8303.

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