



The February 9, 2012 meeting will be held at:

**San Francisco Bay Area Boy Scout Council**  
**1001 Davis Street**  
**San Leandro, CA 94577**  
<http://www.sfbac.org/>  
**(510) 577-9000**

**9:30 a.m. – 12:30 p.m.**

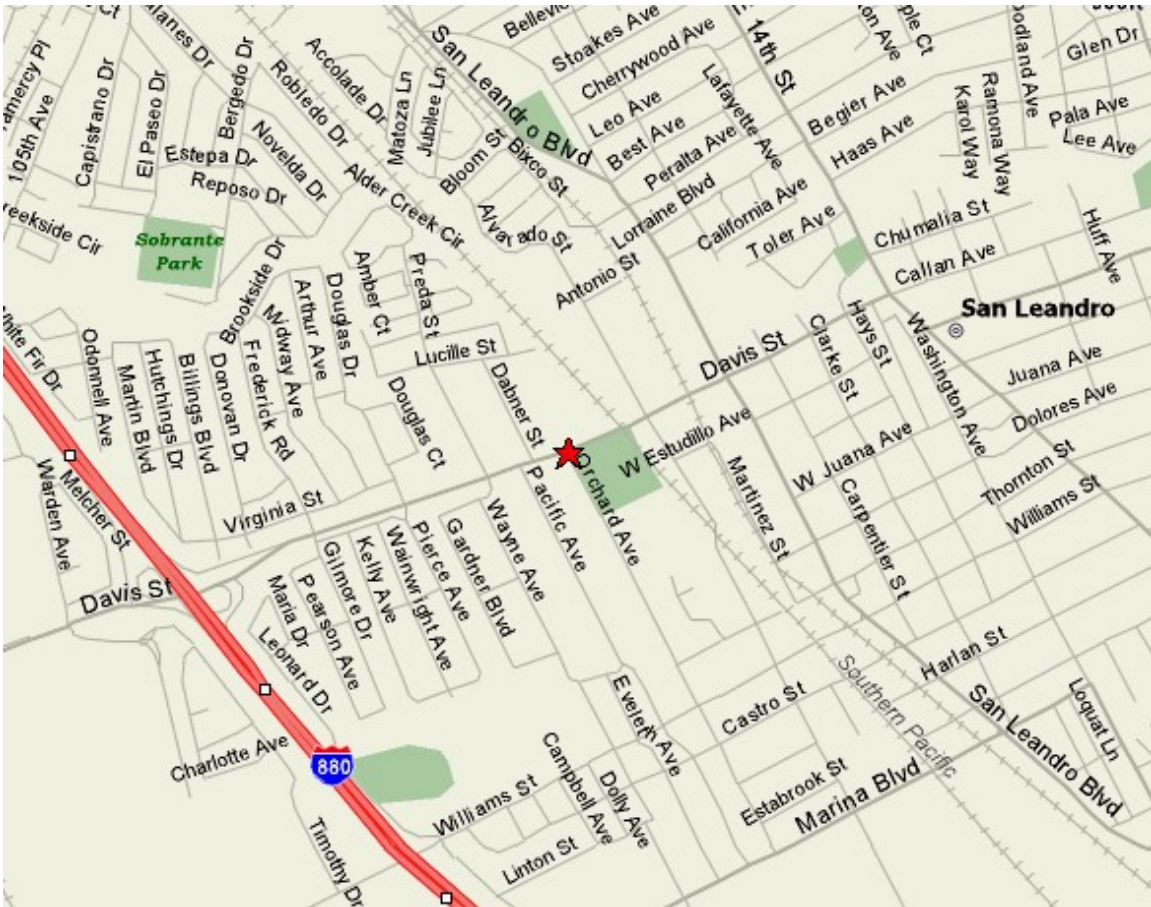
General Meeting & Water Committee  
Theatre Room

Land Committee  
Bank of America Conference Room

**Next Meeting**

March 8, 2012

Carollo Engineers  
2880 Gateway Oaks Drive, Suite 300  
Sacramento, CA



## Driving Directions

From the Oakland Airport:

- Right on Doolittle
- Left on Davis

Participants should not incur a costly taxicab fee, as this location is about 2.5 miles from the airport. The following website provides a link to MapQuest for driving directions: [http://www.sfbac.org/facilities/fac\\_yltc.cfm](http://www.sfbac.org/facilities/fac_yltc.cfm)

Please note that the Boy Scout Council is located within walking distance of the San Leandro BART station. Detailed information can be obtained on the BART website: [www.bart.gov/stations/stationguide/localareamap.asp](http://www.bart.gov/stations/stationguide/localareamap.asp)

# TRI-TAC MEETING

San Francisco Bay Area Boy Scout Council  
1001 Davis Street  
San Leandro, CA 94577

General Meeting & Water Committee  
Theatre Room

Land Committee  
Bank of America Room

THURSDAY, FEBRUARY 9, 2012  
9:30 A.M. – 12:30 P.M.

## 9:30 A.M. – GENERAL MEETING

## ATTACHMENTS

1. INTRODUCTIONS
2. TRI-TAC MEETING ATTENDANCE SUMMARY P. 4  
FOR JANUARY 17, 2012
3. FUTURE MEETING SCHEDULE/COMMITTEE ASSIGNMENTS P. 5-7
4. TRI-TAC RETREAT SUMMARY
5. CROSS-MEDIA ISSUES AND CWCCG UPDATE
6. OTHER BUSINESS/NEW ISSUES

## 9:45 – 12:30 P.M. – COMMITTEE MEETINGS

- A. LAND AGENDA – BANK OF AMERICA ROOM P. 8
- B. WATER AGENDA – THEATRE ROOM P. 9

TRI-TAC MEETING ATTENDANCE SUMMARY  
TUESDAY, JANUARY 17, 2012  
ONTARIO, CALIFORNIA

THE FOLLOWING MEMBERS AND INTERESTED PARTIES WERE PRESENT:

Greg Baatrup, FSSD	Jackie Kepke, EBMUD
Matt Bao, LACSD	Greg Kester, CASA
Layne Baroldi, Synagro	Melody LaBella, CCCSD
Matt Bequette, City of Los Angeles	Derrick Lee, City of Los Angeles
Shannon Bishop, LACSD	Phil Markle, LACSD
James Clark, Black & Veatch	Tom Meregillano, OCSD
Doug Edwards, EMWD	Pam Merriam, SCAP
Lorien Fono, PM Engineers	Terrie Mitchell, SRCSD
Rebecca Franklin, City of San Bernardino	John Nelson, Yucaipa Valley WD
Preeti Ghuman, LACSD	Monica Oaklaey, RMC
Diane Gilbert Jones, City of Los Angeles	John Pastore, SCAP
Bobby Gustafson, City of San Bernardino	Mark Pumford, City of Oxnard
Susan Halpin, Elsinore Valley MWD	Hassan Rad, City of Los Angeles
Lisa Haney, OCSD	Kelly Sarber, Maxwest Environmental Systems
Matt Harward, Yucaipa Valley WD	Randy Schmidt, CCCSD
John Hay, Black & Veatch	John Shaffer, Environmental E&C, Inc.
Valerie Housel, City of San Bernardino	Jennifer Shepardson, City of San Bernardino
Jon Hay, Black & Veatch	Christopher Stacklin, OCSD
Al Javier, EMWD	Jeff Ziegenbein, IEUA
Chandra Johannesson, EBMUD	Shelley Zmija, City of Corona DWP

## TRI-TAC MEETING LOCATION & SCHEDULE 2012

TRI-TAC MEETING DATE <sup>1</sup>	LOCATION/HOTEL	COMMENTS
FEBRUARY 9, 2012	Boy Scout Council 1001 Davis Street San Leandro, CA 94577 510-577-9000	
MARCH 8, 2012 <a href="#">confirmed</a>	Carollo Engineers 2880 Gateway Oaks Drive, Suite 300 Sacramento, CA 95833 916-565-4888	CASA D.C. Conference March 12 – 14
APRIL 12, 2012	Boy Scout Council 1001 Davis Street San Leandro, CA 94577 510-577-9000	CWEA – April 17-20 Sacramento, CA  CASA – April 25-27 Napa, CA
MAY 10, 2012	Orange County Sanitation District 108 44 Ellis Avenue Fountain Valley, CA 92708 (Shuttle bus offered from John Wayne Airport at about 8:40am)	
JUNE 14, 2012 <a href="#">confirmed</a>	Carollo Engineers 2880 Gateway Oaks Drive, Suite 300 Sacramento, CA 95833 916-565-4888	
JULY 12, 2012	Boy Scout Council 1001 Davis Street San Leandro, CA 94577 510-577-9000	
AUGUST 9, 2012	DARK	CASA – August 8-11 Monterey, CA
SEPTEMBER 13, 2012	Boy Scout Council 1001 Davis Street San Leandro, CA 94577 510-577-9000	
OCTOBER 11, 2012	Orange County Sanitation District 108 44 Ellis Avenue Fountain Valley, CA 92708 (Shuttle bus offered from John Wayne Airport at about 8:40am)	WEFTEC 2012 Sept. 29 - Oct. 3 New Orleans, LA
NOVEMBER 8, 2012 <a href="#">confirmed</a>	Carollo Engineers 2880 Gateway Oaks Drive, Suite 300 Sacramento, CA 95833 916-565-4888	

TRI-TAC MEETING DATE <sup>1</sup>	LOCATION/HOTEL	COMMENTS
DECEMBER 13, 2012	Boy Scout Council 1001 Davis Street San Leandro, CA 94577 510-577-9000	Holiday Luncheon and Tri-TAC Retreat @ Pardee Valley Springs, CA
<p><sup>1</sup> If you would like to add an agenda item or schedule a presentation for an upcoming meeting, please contact one of the committee co-chairs at least 14 days before the designated meeting date</p> <p><sup>2</sup> If you would like an “after Tri-TAC” meeting noted in the agenda package, please contact Terrie Mitchell at least ten days before the designated meeting date.</p> <p>★ Air Committee will meet.</p>		

Notes for 2012 **revise as needed.**

1. Confirmations are underway.

**TRI-TAC SPONSOR REPRESENTATION 2012**

<b>League of California Cities</b>	<b>CASA</b>	<b>CWEA</b>
Rodney Anderson Phil Bobel Valerie Housel Dave Tucker	Layne Baroldi Sharon Green Ben Horenstein Terrie Mitchell, Tri-TAC Chair Dave Williams	Nichole Baker Tish Berge Gail Chesler Jim Clark Jim Colston Bob Gillette Tom Grovhoug Jon Hay Chandra Johannesson Jackie Kepke, Tri-TAC Vice Chair Hugh Logan Monica Oakley

**Tri-TAC Liaison Representation**

BACWA	Amy Chastain
CASA	Roberta Larson, Greg Kester
SCAP	John Pastore
CVCWA	Debbie Webster
CWEA	Hugh Logan

**COMMITTEES**

<b>AIR</b>	<b>LAND</b>	<b>WATER</b>
<b>Chair:</b> Vacant	<b>Co-Chairs:</b> Vince De Lange Tom Meregillano	<b>Co-Chairs:</b> Shannon Bishop Lorien Fono <b>Finance Subcommittee Chair:</b> Dave Bruns
Gregory Adams Terry Ahn Layne Baroldi Crystal Bell Janet Bell Tish Berge Frank Caponi Amy Chastain Stephanie Cheng James H. Clark Jim Colston Kris Flaig Mary Jane Foley Allison Fruhling Vicki Fry Sharon Green Patrick Griffith John Hake Ann Heil R. Hipkiss Ben Horenstein Kirk Howard	Helen Hu Dan Jackson Steve Jepsen Carol Kaufman Jackie Kepke, Tri-TAC Vice Chair Vlad Kogan Ron Linden Craig Mizutani Adam Moke Robert Newman John Pastore Michele Pla Lisa Rothbart Jim Sandoval Randy Schmidt John Schroeter Jennifer Smith Kevin Steet Susan Suzuki Brian Whitaker	Matt Bao Layne Baroldi Stephanie Cheng Zeynep Erdal Diane Jones Robert Gillette Jon Hay Bonnie Jones Zachary Kay Greg Kester Derrick Lee Mike Moore John Pugliarese Ruben Robles Sharouzeh Saneie Mike Sullivan Nichole Baker Tish Berge Rebecca Bjork Phil Bobel Barbara Buikema Amy Chastain Stephanie Cheng Gail Chesler Joyce Clark Jim Colston Mike Connor Dan Gallagher Preeti Ghuman Nicole Granquist Donald Gray (Gabb) Sharon Green Tom Grovhoug Tom Hall LeAnne Hamilton Lisa Haney F. Patrick Hassey Ben Horenstein Valerie Housel Chandra Johannesson Jackie Kepke, Tri-TAC Vice Chair Roberta Larson Hugh Logan Patricia McGovern Terrie Mitchell, Tri-TAC Chair Arleen Navarret Monica Oakley Laura Pagano Curt Swanson Bonnie Teaford Melissa Thorme David Tucker Roger W. Turner Debbie Webster

# Tri-TAC BIOSOLIDS LAND COMMITTEE

AGENDA  
February 9, 2012  
San Leandro, CA

Item No.	Topics	Lead Person	Est. Time (minutes)	Attachments
1.	<b>Biosolids Issues Matrix</b>			
	▪ Draft Matrix	V. De Lange	10	
2.	<b>Regulatory/Legislative Update</b>			
	<ul style="list-style-type: none"> <li>▪ Ordinances Update                             <ul style="list-style-type: none"> <li>- Imperial</li> <li>- San Luis Obispo</li> <li>- Solano (Measure E)</li> </ul> </li> <li>▪ Kern (Measure E)</li> </ul>	G. Kester, D. Gilbert, S. Saneie	15	
3.	<b>State and Regional Update</b>			
	▪ CalRecycle FOG/Food Waste Digestion	G. Kester	10	
	▪ CDFA Regulations on Rendering	G. Kester	5	
4.	<b>EPA and Nationwide Update</b>			
	▪ Biosolids Solid Waste Definition	G. Kester	10	
	▪ EPA Proposed MACT Standards	G. Kester	5	
	▪ Arsenic Cancer Slope Factor	G. Kester	5	
5.	<b>Regional Facilities Update</b>			
	▪ Bay Area Agencies	V. De Lange, B. Jones	5	
	▪ So. Cal. & C.V. T.	T. Meregillano	5	
	▪ IERCF	M. Bao	5	
	▪ Westlake Farms	M. Bao	5	
	▪ EnerTech	T. Meregillano	5	
	▪ TIRE	D. Gilbert, S. Saneie, D. Lee	5	
6.	<b>Regional Associations' Report</b>			
	▪ SCAP	M. Bao	5	
	▪ BACWA	V. De Lange	5	
	▪ CVCWA	B. Gillette	5	
	▪ CASA	G. Kester	5	
	▪ CWEA	J. Hay	5	
7.	<b>Emerging Contaminants</b>			
	▪ Pyrethroid Working Group	G. Kester	5	
	▪ Trace Organics Activities	G. Kester	5	
8.	<b>Biosolids Research</b>			
	▪ WEF Biogas Study	G. Kester	5	
	▪ Other	G. Kester	5	
9.	<b>Conferences/Webinars</b>		5	
10.	<b>Climate Change Legislation</b>		5	

## Tri-TAC Water Committee Agenda – February 9, 2012

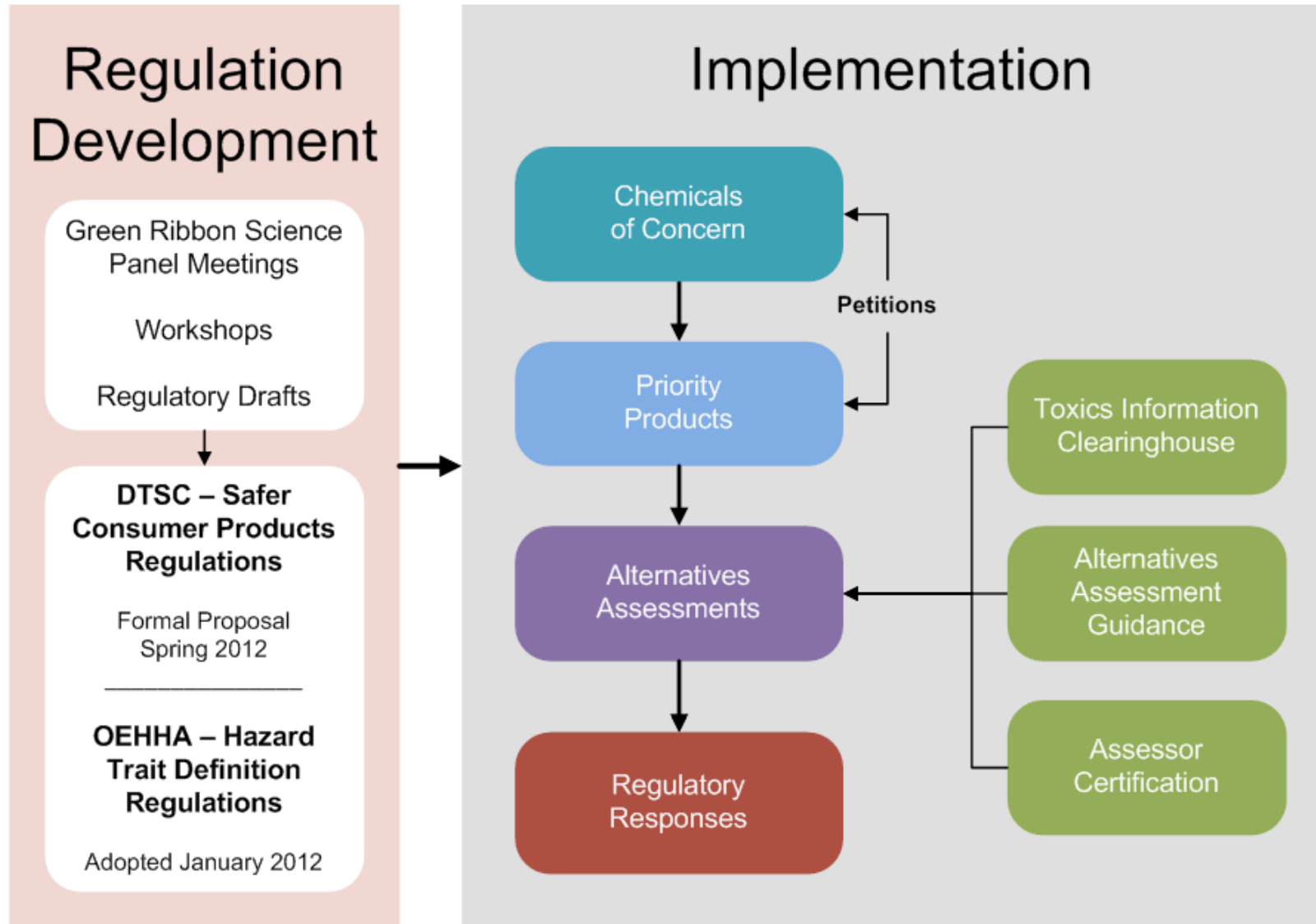
ITEM #	Topic	LEAD	Time (min)	Relevant material
<b>Discussion Items:</b>				
<b>Cross-Media</b>				
1.	Pyrethroid Study Discussion	Greg Kester	30	Package will be sent separately
<b>New Items</b>				
2.	EPA Integrated Permitting	Ben Horenstein	15	<a href="http://www.epa.gov/environmentalinnovation/integrated/index.htm">http://www.epa.gov/environmentalinnovation/integrated/index.htm</a>
<b>Updates</b>				
3.	Update on Draft WDR for SSSs	Bobbi Larson	5	<a href="http://www.waterboards.ca.gov/water_issues/programs/sso/review_update.shtml">http://www.waterboards.ca.gov/water_issues/programs/sso/review_update.shtml</a>
4.	Nutrient Policy Update (if any)	Tom Grovhoug	5	
5.	State CEC Panel Update (if any)	Lorien Fono	5	CEC Fact Sheet: <a href="ftp://ftp.sccwrp.org/pub/download/DOCUMENTS/FactSheets/CECFactSheet_Jan2012_web.pdf">ftp://ftp.sccwrp.org/pub/download/DOCUMENTS/FactSheets/CECFactSheet_Jan2012_web.pdf</a>
6.	Whole Effluent Toxicity Update	Bobbi Larson	15	
7.	Ocean Plan Amendment- MPAs	Shannon Bishop	5	
8.	EPA's DMR Pollutant Loading Tool	Shannon Bishop	10	<a href="http://www.epa.gov/pollutantdischarges/">www.epa.gov/pollutantdischarges/</a>
9.	Technical Advisory Stakeholder Group for Biocriteria	Shannon Bishop	5	
10.	Green Chemistry Update and Presentation	Kelly Moran	30	<a href="http://www.dtsc.ca.gov/SCPRegulations.cfm">http://www.dtsc.ca.gov/SCPRegulations.cfm</a> , Attachments 1 and 2

**Informational Items:**

**Items that are out there:**

Sediment Quality Objectives		
-----------------------------	--	--

# Safer Consumer Products Regulations





December 27, 2011

*Sent via email to: gcregs@dtsc.ca.gov*

Department of Toxic Substances Control (DTSC)  
P.O. Box 806  
Sacramento, CA 95812-0806

**Re: Comments on Informal Draft Regulations for Safer Consumer Products: R-2011-02**

Dear DTSC Staff:

The Bay Area Clean Water Agencies (BACWA) appreciates the opportunity to comment on the Informal Draft Regulations for Safer Consumer Products. BACWA is a joint powers agency, formed under California Government Code section 6500 *et seq.*; our members own and operate publicly-owned treatment works (POTWs) and sanitary sewer systems that provide sanitary services to over 6.5 million people in the nine-county San Francisco Bay Area. BACWA members are public agencies, governed by elected officials and managed by professionals charged with protecting the environment and public health.

BACWA applauds DTSC staff for their work on the draft regulations for Safer Consumer Products. BACWA hopes that these regulations will provide a mechanism for preventing harm to public and environmental health from consumer products. POTWs are very effective at removing many kinds of biological and chemical pollutants from municipal wastewater before it is discharged to our lakes, rivers estuaries and oceans. However, it is impossible for POTWs to treat or control (through pretreatment or pollution prevention outreach) the vast array of organic and inorganic compounds that are in commercial use today. Some of these chemicals will pass through the treatment plant unchanged where they may harm aquatic life and/or indirectly enter into the drinking water supply. Other chemicals may be degraded or transformed through the natural treatment process into new compounds with environmental implications. Chemicals removed from wastewater may partition into our biosolids (sewage sludge), which could limit options for beneficial reuse of these rich organic materials. Finally, some compounds may harm the biological treatment processes themselves, thereby interfering with a POTW's ability to comply with regulations designed to protect water quality.

In the past, POTW's ability to take action on a specific compound was limited largely to the legislative arena. For example, municipal wastewater agencies have appealed to the legislature for assistance controlling the following products:

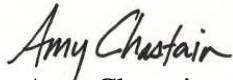
- Mercury in thermometers, thermostats, lighting and switches;
- Copper in brake pads;
- Paradichlorobenzene in urinal deodorizers; and
- Lindane in head lice and scabies treatments (non-pesticide products).

While successful, these efforts took many years and many resources to accomplish and highlighted the need for a more comprehensive and coordinated approach. Wastewater agencies are encouraged that DTSC's regulations may address many pollutants of concern to the wastewater community. We have attached detailed comments to ensure that the regulations are sufficiently robust to address products that threaten harm to the water environment and our public infrastructure.

One way to ensure that wastewater treatment and water quality priorities are addressed is by seeking technical guidance on which chemicals to evaluate from the State Water Quality Control Board and Department of Fish and Game. However, we are concerned that DTSC does not have adequate resources to review the many products on the market today. If DTSC does not receive sufficient funding for this effort, POTWs will likely continue to seek help from the legislature on products that are a priority for water quality.

Thank you for the opportunity to provide our comments. If you have any questions, please contact Melody LaBella, with the Central Contra Costa Sanitary District, at (925) 229-7370 or [mlabella@centralsan.org](mailto:mlabella@centralsan.org) or Karin North, with the City of Palo Alto, at (650) 329-2104 or [Karin.North@cityofpaloalto.org](mailto:Karin.North@cityofpaloalto.org).

Sincerely,



Amy Chastain  
Executive Director

## Attachment – Detailed Comments

### Definitions (Article 1)

Definition of Adverse ecological impacts (3). Section (G) of this definition is exceptionally important because is the only portion of the entire definition of “adverse environmental impacts” that addresses the most common water pollution and POTW operational problems.

Definition of Adverse environmental impacts (4). Add “Adverse waste and end-of-life impacts” §69501.2 (7). If this addition is not made, DTSC would miss POTW operational impacts. An alternative would be to add “adverse waste and end of life impacts” whenever “adverse environmental impacts” is used throughout the regulation.

Recommend adding “Non-compliance with local, state, or Federal environmental laws and regulations” to this definition for clarification purposes. Analyzing for and demonstrating non-compliance is often simpler than determining the environmental impacts associated with the non-compliance.

Definition of Adverse waste and end-of-life impacts (7). Modify (C) to read: “*Discharge or disposal of the priority product or waste streams containing the chemical from the priority product...*” This will allow DTSC to address products like molybdenum in cooling water additives, which is discharged to sewer systems together with cooling water system discharges.

Delete the final phrase in Subsection (C) (“and that may result in the release of Chemicals of Concern to the environment.”). Operational interference at a POTW may cause the discharge of partially treated wastewater that does not necessarily include the chemical of concern.

Definition of Adverse water quality impacts (8). This definition is incomplete. The definitions of “adverse ecological impacts” and “adverse public health impacts” capture most relevant environmental endpoints through reference to Chapter 54. A better definition would be “cause or contribute to violations of water quality standards, adverse effects to aquatic ecosystems, or degradation of any waters, including surface or ground waters.”

Definition of Chemical (16). The definition should include degradates, metabolites, and reaction products in the environment. If this change is not made here, changes will be necessary throughout the regulation to ensure that DTSC adequately captures chemicals for which the environmental problem is a degradate, reaction product, or metabolite. The definition should also clarify that when an element is listed (e.g., copper) that organic and inorganic chemical compounds containing that element are also included (e.g., copper oxides, copper sulfate, brass and other copper-containing alloys, copper naphthenate).

Definition of Economic impacts (27). This definition should be revised to include externalized costs, including but not limited to government costs (e.g., POTW-related costs).

Definition of Environment (31). This definition should be revised to include wastewater collection, wastewater treatment, and biosolids management systems.

Definition of Environmental Fate Properties (32). Should include identification of degradates, metabolites, and reaction products that will be formed in the environment, and municipal wastewater treatment fate data requirements. The U.S. EPA Office of Pesticide Programs uses the following municipal wastewater treatment environmental fate data requirements: activated sludge sorption isotherm, ready biodegradability, modified activated sludge respiration inhibition test, and porous pot study (see [http://www.epa.gov/ocsp/ocspp/pubs/frs/publications/Test\\_Guidelines/series835.htm](http://www.epa.gov/ocsp/ocspp/pubs/frs/publications/Test_Guidelines/series835.htm)).

Definition of Lifecycle (46). This definition should specifically include reasonably anticipated misuse, activities associated with use (e.g., cleaning after use), and common accidents involving products.

Definition of “Reliable information demonstrating the occurrence or potential occurrence of exposures to a chemical” (67). This definition should be removed because it severely, and unnecessarily, limits the types of scientific information that DTSC may consider when identifying a chemical of concern or a priority product.

Should DTSC feel that it is essential to define this phrase in a manner that specifies (and therefore limits) the types of scientific information that would be allowable for DTSC to use, it should consult with the Green Ribbon Science Panel to create a definition that includes the full range of scientifically sound methods for development of reliable information demonstrating the occurrence or potential occurrence of exposures to a chemical.

In Subsection (H) 4., when a chemical interferes with a waste treatment process, the end result may not necessarily be that the same chemical is discharged to the environment. Other chemicals may be discharged at higher concentrations (e.g., bacteria or excess nutrients might occur in wastewater effluent) or a composting facility might not be able to create usable compost (which of course is not “discharged”).

### **Chemicals of Concern Identification Process (Article 2)**

While we support DTSC’s approach to developing the initial list of Chemicals of Concern, the proposed set of lists needs expansion to better reflect current and emerging water pollutants. We recommend that DTSC consult with the Water Boards to identify a more comprehensive set of lists of water pollutants. For example, any toxic pollutant for which a California Water Board has established a water quality objective should be a chemical of concern.

Without modifying the definition of “chemical” it would be challenging to create a listing that captures chemicals where degradates, metabolites, or reaction products cause environmental harm. Similarly, the definition of chemical would be a simpler place to address the need to capture families of related chemicals (e.g., all copper compounds and alloys), because it would be untenable to list every single one.

### **Chemicals of Concern and Consumer Product Prioritization Process (Article 3)**

Product Prioritization Criteria. This section needs revision to ensure the ability to prioritize products that harm the environment. The Priority Products Prioritization, Potential Exposures Section 69503.2 (a) (1) (B), could effectively de-prioritize products that impact POTWs and, therefore, our aquatic environment. We do not believe that this is DTSC’s intent. We urge DTSC to reconsider listing of a limited set of “considerations” in the regulations, i.e., to delete everything in Section 69503.2 (a) (1) (B) starting with “considering:” and the entire remainder of the section.

Should DTSC feel that inclusion of specific use patterns or exposure pathways in this section of the regulations is essential, it should consult with the Green Ribbon Science Panel to create a scientifically-based selection of priority use patterns and/or exposure pathways.

If DTSC elects to revise, instead of removing, the existing text we suggest the following revisions:

Cumulative exposures (a) (1) (B) 3. The criteria for cumulative exposures should include water pollution. Please delete the word “household.”

Accumulation and persistence are not appropriate limitations in (a) (1) (B) 4. e. Both of these words should be deleted. Water quality problems are no longer exclusively associated with persistent, bioaccumulative toxins. All that is necessary is that the pollutant be present and the concentration of the pollutant be sufficient to harm aquatic life or ecosystems.

Wastewater consideration. Recommend adding a new consideration:

“5. Used or discharged in any manner that creates a pathway for the chemical of concern or its degradates, metabolites, or reaction products to reach a sewer drain.”

Other regulatory programs (a) (3). AB 1879’s provisions to avoid regulatory duplication do not provide that requirements related to a chemical be a consideration in prioritization. Since DTSC seeks to avoid regulatory overlap related to products—and does not seek to preclude prioritization of products that create pollution that must currently be managed through costly pollutant abatement programs like POTW treatment processes, it should modify this subsection to delete mention of the regulation of chemical of concern.

Additional Prioritization Criteria. Two key criteria are missing from this section:

- Externalized costs (e.g., costs for water pollution control), particularly costs to local government agencies.
- Products associated with violations of environmental laws (e.g., Clean Water Act, California’s Porter Cologne Act)

Subsection (b), Key Prioritization Criteria should be modified to avoid de-prioritization of water pollutants discharged to POTWs. Options include deleting subsections (4) and (5) (preferred) or including an additional criterion that would capture POTW discharges, e.g., “Used or discharged in any manner that creates a pathway for the chemical of concern or its degradates, metabolites, or reaction products to reach a sewer drain.” Since POTW discharges may be associated with both assembled and formulated products, this criterion should apply to all products.

Process for Consideration of the Prioritization Factors. DTSC should consult with the Water Boards during this process.

### **Opportunities for POTW Input Prior Earlier in the Alternatives Assessment (AA) Process**

Based on our experience with U.S. EPA pesticide Registration Review, we strongly recommend that DTSC incorporate an opportunity for input early in the AA process, before the scope of the AA is finalized. We have found that POTW discharge pathways have often been missed in pesticide risk assessments work plans. Because of our comments identifying these pathways, U.S. EPA has been able to modify its work plans such that it can complete a POTW discharge assessment along with its assessments of other environmental exposure pathways. Before EPA provided this early public comment opportunity, POTWs could not know that this pathway was missed until EPA proposed its regulatory decision. At this point, it was inconvenient and time-consuming for EPA to revisit its environmental risk assessments.