

POTW Pesticides Conundrum

- 100s of Pesticides used & discharged
- Many pass through POTWs
- Some toxic as low as ng/L
- Treatment changes unrealistic (so many pesticides, such low concentrations!)
- State law prohibits local pesticide regulation

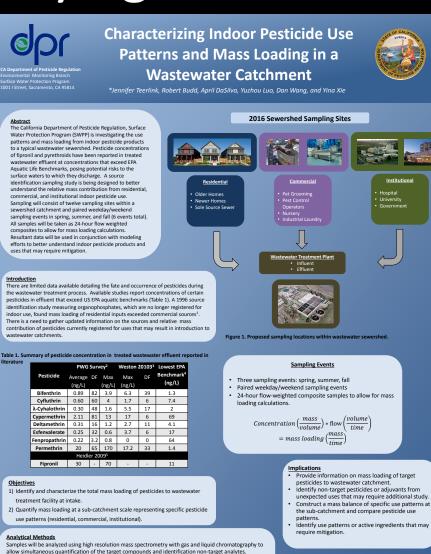
Water Board gets this

DPR gets this

EPA hasn't quite figured it out

BACWA's Work is Paying Off - DPR

- Hired wastewater experts
 - Dr. Jennifer Teerlink
 - Dr. Yina Xie
- Developing POTW discharge model
 - 1-2 years: Use for registration decisions!
- First discharge studies
- Sewershed Study



District Sewer System, Summer 1996, California Department of Pesticide Regulation, Markle et al. (2014). Pyrethroid pesticides in manicipal wastewater: A baseline survey of publicly owned treatment works facilities in California in 2013, Pyrethroid Working Group. Weston and Lydy (2010). Urban and Agricultural Sources of Pyrethroid insecticides to the Socramento-San Logalium Data of California InSERT 44(1): 1833–1840.

BACWA's Work Has Promise - EPA

- Using POTW discharge model (has scientific errors)
- POTW process interference testing requirements

• R9 Pesticides liaison is wastewater expert (Dr. Patti

TenBrook)

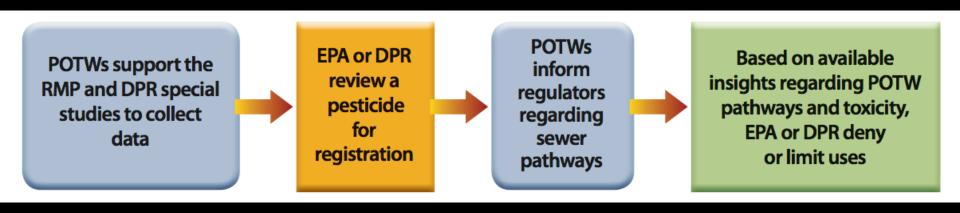


EPA a Challenge – But Drives POTW Solutions

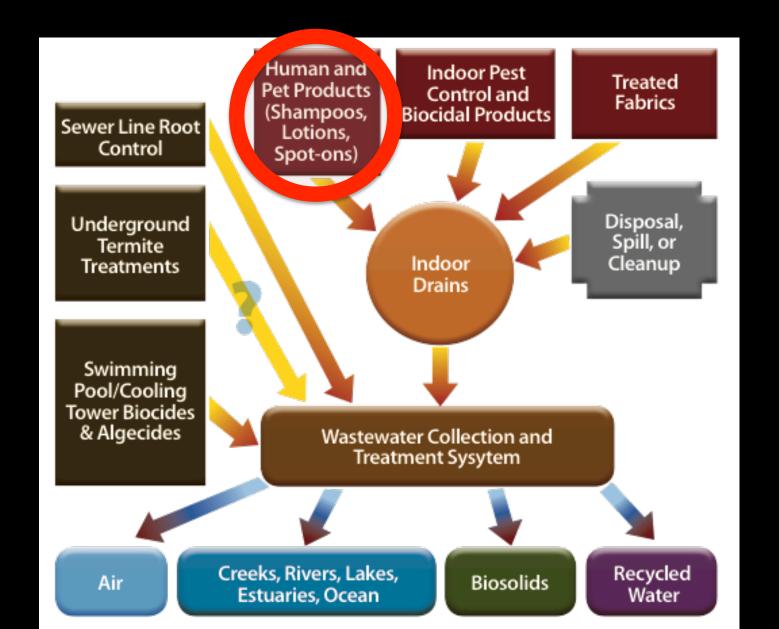
- Authority for consumer products better than DPR
- EPA reviews pesticides only once every 15 years
 - Top 4 priorities up in FY 2016/17
 - Technically complex reviews have multiple steps
 - EPA distracted by ESA litigation & Bee problems
- No data = no action!
 - Evidence is required for pesticide regulation
 - No POTW monitoring system

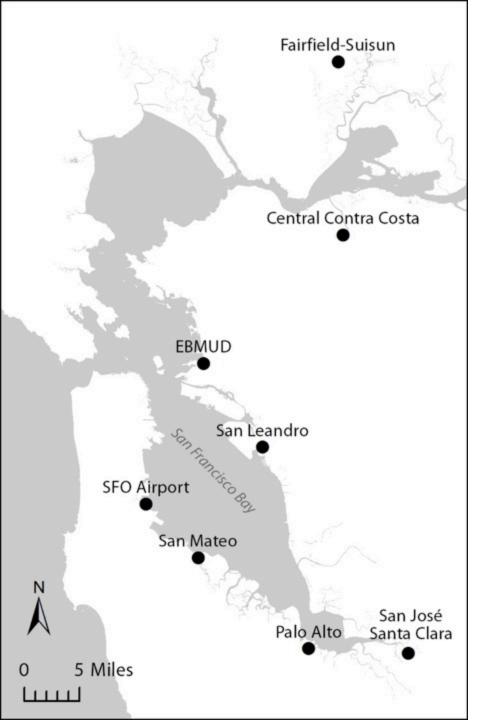
Pesticides Management Vision

Move management upstream from CWA -> FIFRA



POTW Pesticides Sources





RMP Special Study – Fipronil & Imidacloprid

24-hour composites sludge/biosolids

Joint POTW participation key factor for success

Contributors

- Regional Monitoring Program for Water Quality in San Francisco Bay
- Bay Area wastewater community
- Arizona State University
- TDC Environmental, LLC
- California Department of Pesticide Regulation



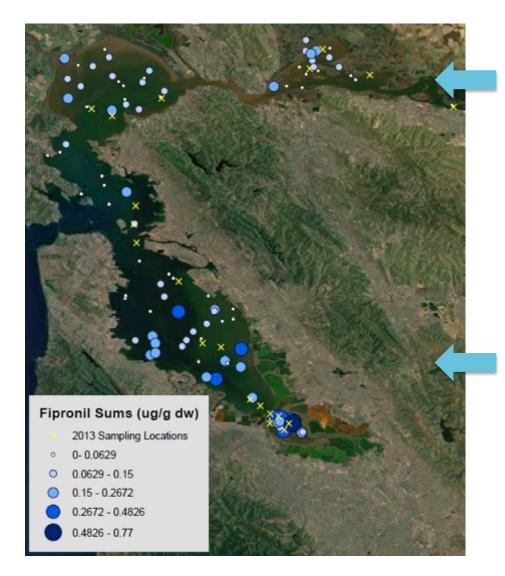
Fipronil







Fipronil



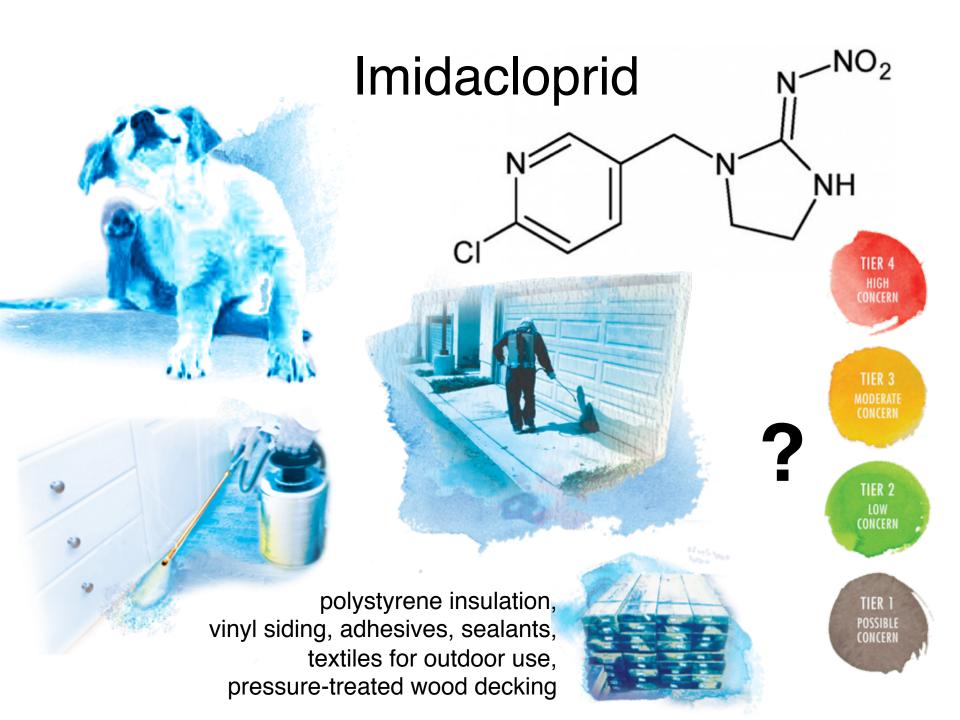
Pathways to Bay:

Stormwater

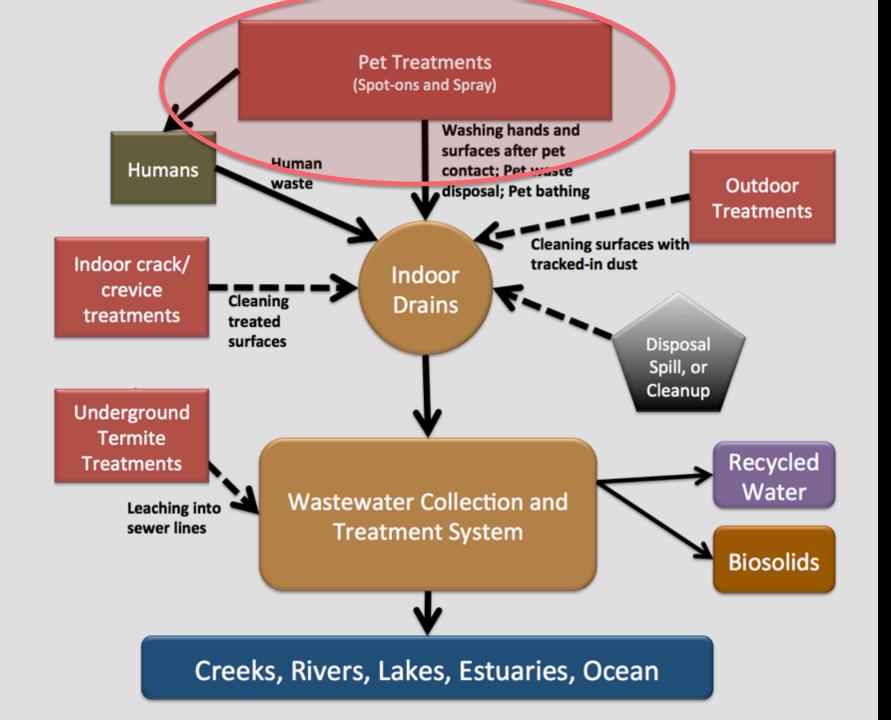
- Detected in 96% of samples from 6 creeks
- One-third exceeded toxicity thresholds

Treated Wastewater

- Limited data suggest treatment has little effect
- DATA NEEDED



Fipronil & Imidacloprid RMP monitoring data – in review for publication



Chemical spreads out after treatment

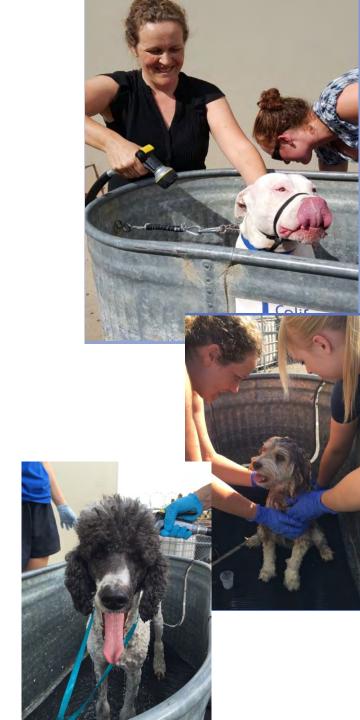


Photos: Bigelow-Dyk 2012

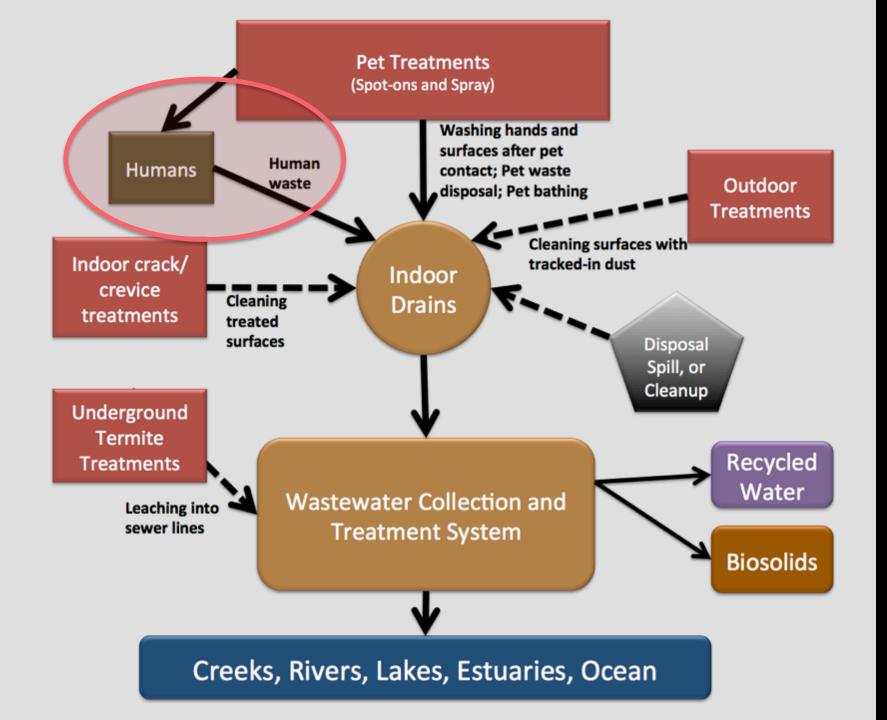


Fipronil Washes Off Pets

Wash-off continues for at least 28 days



Source: DPR preliminary data Photos: DPR



These Data = Big News for EPA & DPR

- Neither agency has ever considered discharges from pet "spot-on" treatments!
- Timing is crucial!
- Best mitigation opportunity = EPA's fipronil & imidacloprid reviews *this year*
- Big changes in whole approach to POTW discharges are possible if we get the word out to EPA & manufacturers

BAPPG is Being Proactive on These Issues

- Multiple calls with both EPA and DPR
 - Active coordination with DPR to work on EPA
 - Study is example of EPA regulatory gaps crossing 3 divisions in pesticide regulatory program
 - EPA-invited presentation ACS Philadelphia (Aug.)
- Reviewing flea/tick alternatives to pet "spot treatments"

Change ahead – fipronil health risks

Pesticides Market Constantly Evolving

Pet Flea Control Product mix 2005-2014 constantly changing

Pesticides Management Vision

Move management upstream from CWA -> FIFRA

MS4 Progress Promising for POTWs

State Water Board Pesticides Plan Stormwater Only

Primary Pesticides Solution = DPR + EPA

Anticipated permit requirements:

- 1. Outreach/education (OWOW etc.)
- 2. Limit municipal pesticide use (IPM)
- 3. Regulatory participation (UP3)
- 4. Conduct *useful* monitoring

Draft in 2016 \rightarrow Adoption 2017

FY 2016-2017 Highlights

- EPA Risk Assessments: Pyrethroids, Fipronil, Imidacloprid, Copper
- EPA Science discussions ACS Conference (Aug.)
 - K. Moran invited presenter
 - Can POTW predictive model be improved?
- DPR
 - Sewershed Study
 - Registration predictive model development & test cases <u>based on BACWA request letters</u>
 - Science discussions POTW & salt water monitoring
- State Water Board Stormwater Pesticides Plan

Future is Promising

- It's a marathon not a sprint
- Change will only occur with active POTW engagement

