

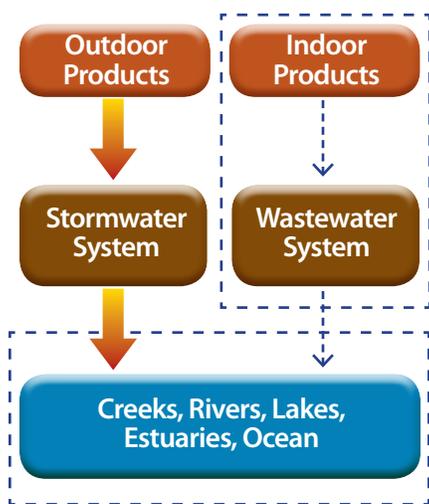
Pesticide Regulatory Update and Call to Action



BACWA and its members have an important opportunity to weigh in on toxic pesticides that have pathways to Publicly-Owned Treatment Works (POTWs). In the coming months, BACWA members need to proactively engage with:

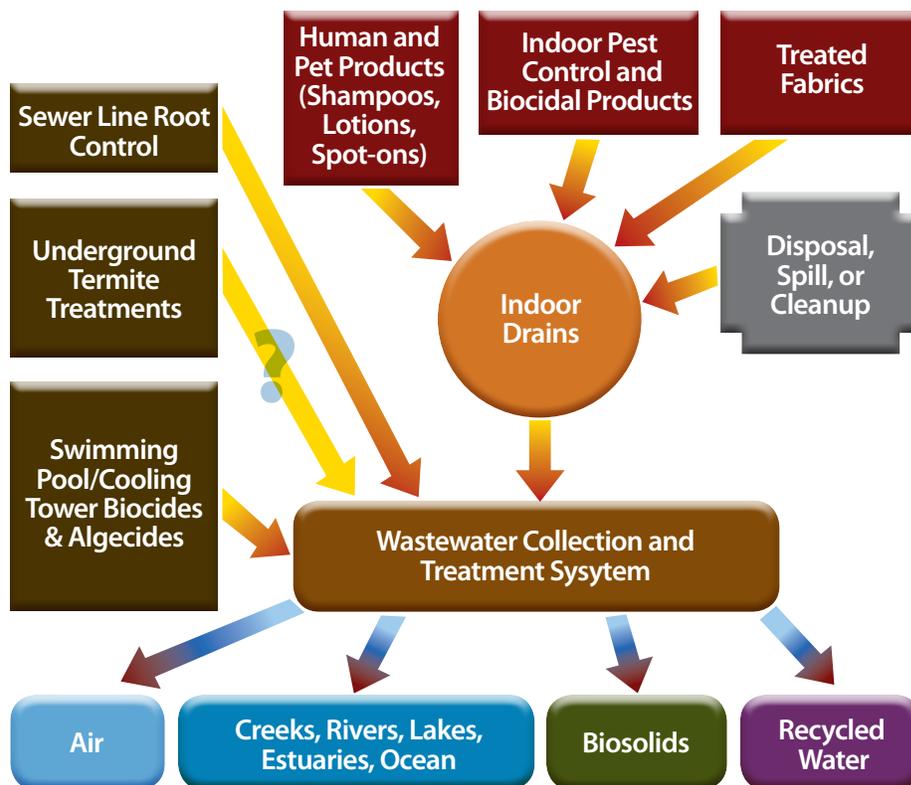
1. US EPA during the registration review of fipronil, pyrethroids and other key pesticides.
2. California Department of Pesticide Regulation (DPR) and San Francisco Estuary Institute (SFEI) and their on-going studies to enhance understanding, improve modeling of pesticide fate and transport, and identify targeted mitigation measures for DPR or EPA implementation.

Typical Regulatory Outlook

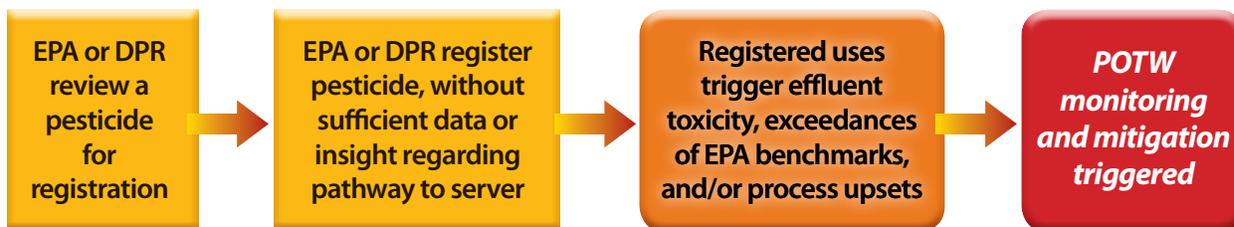


In pesticide risk assessments, either the eventual urban water quality impact is ignored altogether or only stormwater pathways are considered. Such omissions can prove costly for POTWs, due to process interference and/or impacts to receiving water, recycled water and/or biosolids.

Reality for a POTW



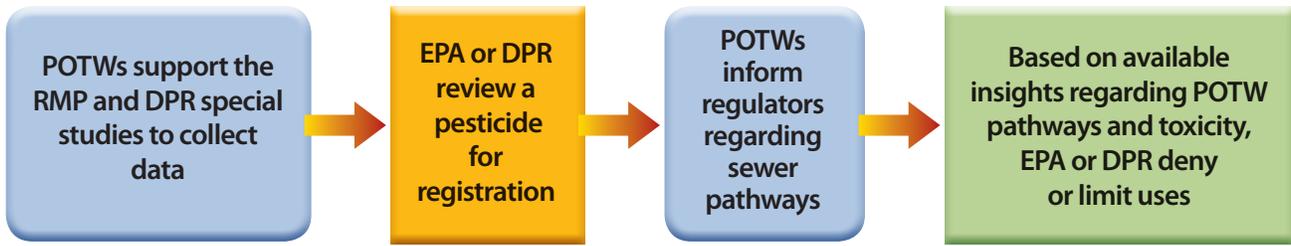
Pesticide regulatory actions often ignore uses with pathways to sewers, leaving waterways vulnerable and POTWs responsible for costly monitoring and mitigation.



POTWs cannot regulate pesticides sales or use. Effective mitigation needs EPA and DPR action.

2016 is a key year for some highly toxic pesticides that have pathways to POTWs. The EPA is reviewing the registration of several key pesticides, a task it conducts once about every 15 years. If we miss this window, it could impact POTW operations and receiving water quality for years to come. Further, in recent years the DPR has begun to more effectively evaluate water quality impacts of pesticides, engaging with the State Water Board staff, hiring in-house wastewater experts, initiating their first scientific wastewater studies, and developing wastewater discharge models.

POTWs have an opportunity to avoid reactive measures by supporting data collection studies and educating regulators regarding sewer pathways.



In 2016, the highest priorities for Bay Area POTWs are fipronil and pyrethroids. Fipronil is a Contaminant of Emerging Concern (CEC) for which the San Francisco Regional Water Quality Control Board is requiring a Management Action Plan from all Bay Area POTWs, in part because effluent concentrations often exceed EPA Benchmarks. Pyrethroids include more than 18 individual compounds; in 2015, the EPA decided to prepare a joint risk assessment for these pyrethroids, rather than individual assessments, presenting opportunities and challenges for all stakeholders. The single risk assessment approach means that there is only one opportunity to engage and provide monitoring and toxicity data until the next review cycle (15 or more years in the future). BACWA attention is especially important given the unique nature of this review. Other keys for 2016 are DPR scientific and modeling studies and the EPA registration reviews for copper and silver compounds, imidacloprid, and precedent-setting risk assessment approaches being piloted in the malathion review.

2016 and 2017 include significant opportunities for Bay Area POTWs to engage.

2016-17 Priority	Pesticide <i>(Primary indoor use)</i>	State Level	Federal Level <i>(Estimated stakeholder comment date)</i>
First Priority	Fipronil (Topical treatments on pets for flea and tick control)	DPR dog washing study (in progress) SFBRWQCB is drafting a CEC factsheet to clarify concerns and requirement for POTW Management Action Plans RMP Special Study in progress (SFEI/ Region 2)	EPA Risk Assessment (Feb 2017)
	Pyrethroids (Indoor and topical treatments to control ants, cockroaches, fleas, head lice, and bed bugs.)		EPA Risk Assessment (Fall 2016)
	All	DPR POTW monitoring study (in planning) DPR wastewater modeling methodology	POTW Modeling Methodology (Multiple conference calls with BACWA and EPA in 2016)
High Priority	Malathion (Flea and head lice treatments)		EPA Risk Assessment (Summer 2016)
	Copper and Silver (Treated fabric)	DPR reviewing registration of impregnated clothing and food containers	EPA Copper Risk Assessment (Spring 2016) EPA Silver Risk Assessment (expected 2017)
	Imidacloprid (Topical flea treatments on pets)	RMP Special Study in progress (SFEI/ Region2)	EPA Risk Assessment (Fall 2016)
	All	Statewide Pesticide Plan (stormwater focused; POTW impact TBD)	

BACWA seeks to proactively support a scientifically sound pesticide management program that will not impact POTWs' primary functions of collecting and treating wastewater, recycling water, and managing biosolids.