



December 2, 2016

Yu-Ting Guilaran, Director
Pesticide Re-evaluation Division (7508P)
Office of Pesticide Programs (OPP)
U.S. Environmental Protection Agency (U.S. EPA)
1200 Pennsylvania Ave., NW.
Washington, DC 20460-0001

Subject: Request for Extension of the Comment Period for the Draft Ecological Risk Assessment for the Pyrethroid Insecticides:
Bifenthrin – EPA-HQ-OPP-2010-0384
Cyfluthrins – EPA-HQ-OPP-2010-0684
Cypermethrins – EPA-HQ-OPP-2012-0167
Cyphenothrin – EPA-HQ-OPP-2009-0842
d-Phenothrin – EPA-HQ-OPP-2011-0539
Deltamethrin – EPA-HQ-OPP-2009-0637
Esfenvalerate – EPA-HQ-OPP-2009-0301
Etofenprox – EPA-HQ-OPP-2007-0804
Fenpropathrin – EPA-HQ-OPP-2010-0422
Flumethrin – EPA-HQ-OPP-2016-0031
Gamma-cyhalothrin – EPA-HQ-OPP-2010-0479
Imiprothrin – EPA-HQ-OPP-2011-0692
Lambda-cyhalothrin – EPA-HQ-OPP-2010-0480
Momfluorothrin – EPA-HQ-OPP-2015-0752
Permethrin – EPA-HQ-OPP-2011-0039
Prallethrin – EPA-HQ-OPP-2011-1009
Pyrethrins – EPA-HQ-OPP-2011-0885
Tau-fluvalinate – EPA-HQ-OPP-2010-0915
Tefluthrin – EPA-HQ-OPP-2012-0501
Tetramethrin – EPA-HQ-OPP-2011-0907

Dear Ms. Guilaran:

On behalf of the Bay Area Clean Water Agencies (BACWA), we request that the comment period for the pyrethroid insecticides draft joint ecological risk assessment be extended to May 1, 2017, to provide adequate time for review.

BACWA's members include 55 publicly-owned wastewater treatment facilities ("POTWs") and collection system agencies serving 7.1 million San Francisco Bay Area residents. We take our responsibilities for safeguarding receiving waters seriously. BACWA is especially interested in

pesticides like pyrethroids that are used by consumers in manners that create a transport pathway to the sanitary sewer.

Based on prior discussions, we understand that U.S. EPA Office of Pesticide Programs (OPP) has omitted some pyrethroids uses known to be linked to sewer discharges (e.g., pet flea treatments) from this risk assessment. Inaccurate source identification stymies the selection of appropriate and effective risk mitigation options. Inaccurate evaluation of this environmental exposure pathway can prove costly for POTWs, due to the potential for pesticides like pyrethroids to cause or contribute to NPDES Permit compliance issues, impacts to receiving waters, recycled water quality and/or biosolids reuse, in addition to exposing POTWs to the potential for third party lawsuits under the Clean Water Act.

The long, complex risk assessment covers 23 separate pyrethroid chemicals and involves multiple scientific documents that will require substantial time to review fully. OPP is opening the comment period at the start of the holiday season and at the end of the calendar year, when our organization and its members face multiple year-end deadlines. As a result, obtaining all needed scientific information and completing the necessary coordination among our agency members and POTW scientific experts will be delayed. While BACWA appreciates the 60-day comment period provided, we respectfully request additional review time – 120 days after January 1 – to complete our review and to prepare constructive comments in support of this crucial regulatory process.

Thank you for your consideration of our comments. If you have any questions, please contact BACWA's Project Managers, Karin North at (650) 329-2104 or Karin.north@cityofpaloalto.org or Melody LaBella at (925) 229-7370 or mabella@centralsan.org.

Respectfully Submitted,



David R. Williams
Executive Director
Bay Area Clean Water Agencies

cc: Jack Housenger, Director, EPA Office of Pesticide Programs
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