



January 29, 2019

Ms. Leigh Rimmer
OPP Docket
Environmental Protection Agency Docket Center (EPA/DC)
(28221T)
1200 Pennsylvania Ave., NW.
Washington, DC 20460-0001

Subject: Metam Sodium and Metam Potassium, Draft Risk Assessment (EPA-HQ-OPP-2013-0140)

Dear Ms. Rimmer:

On behalf of the Bay Area Clean Water Agencies (BACWA), we thank you for the opportunity to comment on the Draft Risk Assessment for the root control chemical metam sodium. 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 the Draft Risk Assessment for metam sodium because it is an effective chemical commonly used to control root invasion in wastewater collection systems. Controlling roots prevents collection system blockages. Blockages can cause untreated wastewater to spill out of the collection system.

The Draft Risk Assessment did not assess risks related to metam sodium's use in wastewater collection systems. BACWA seeks to protect the safety of workers who regularly enter wastewater collection systems for monitoring and maintenance. BACWA respectfully requests that EPA:

- (1) recognize the potential for significant risks from exposure to metam sodium and its degradate, methyl isothiocyanate (MITC), if workers inadvertently enter collection systems undergoing treatment, and
- (2) implement a minor label language change to ensure worker safety protection.

Use of Metam Sodium in Wastewater Collection Systems is Significant

While nationwide data on metam sodium use in sewer collection systems may not be readily available, data from California alone demonstrate that there is a significant use of metam sodium. In California, all pesticides applied by professional applicators are reported to California Department of Pesticide Regulation (CDPR) and – after quality assurance – this information is

made publicly available by CDPR in its Pesticide Use Reporting (PUR) database. According to this database (which can be searched for applications of products registered solely for sewer root control), in 2016, more than 50,000 pounds of metam sodium were applied for sewer root control. In 2014 and 2015, usage levels were similar.

BACWA Requests Minor Label Modification to Protect Worker Safety

BACWA appreciates that current metam sodium labels include a requirement to notify downstream POTWs about impending metam sodium applications. We appreciate and support the existing requirements to inform the POTW of the maximum application quantity (essential for protection of POTW operations) and to notify POTWs about metam sodium's process interference hazard, as some POTWs may not be aware of this risk.

We request that the current language be slightly modified to require POTW notification at least 24 hours prior to applications and to specifically address worker safety protection. Our suggested revisions to these elements of the proposed label language are shown (underlined and in bold font) in the box below.

Requested Modifications to Metam Sodium POTW Notification Label Instructions (Based on Existing Metam Sodium Root Control Product Label Language)

“This product must be used only where wastewater treated for root control will be processed through a wastewater treatment facility. Applicators must notify downstream waste water treatment facilities **at least 24 hours** prior to the start of metam sodium applications so **they can protect worker safety by restricting staff from entering downstream collection system lines** and that they may monitor the operations of the wastewater treatment plant. Applicators must report how much product will be applied to the sewage system to operators of downstream water treatment plants and ~~to~~ inform these operators that high concentrations of these chemicals in wastewater may adversely affect the biological sewage breakdown process in wastewater treatment plants. Never exceed the daily use of more than 15 gallons of Sanafoam Vaporooter II Liquid Concentrate for each million gallons of sewage flow (MGD) into the wastewater treatment plant (WWTP). *Example:* Inflow into the WWTP is 2.4 MGD, therefore, use a maximum of 36 gallons (2.4 x 15) of Sanafoam Vaporooter II per day. When Vaporooting within one mile distance of the WWTP or when applying at night reduce the maximum application use by 50 % to 18 gallons (36 x .5). The above maximum daily use must extend over an eight hour work period.”

A minimum of 24 hours between notification and the start of metam sodium application is essential to provide POTWs with the time necessary to provide worker safety and operational protections. Under current labels, the notification could occur within a few minutes before the metam sodium application. With less than a 24-hour notice, it is possible that workers could already be in the collection system when the metam sodium application occurs. Labels for other root control pesticides will soon require a 24-hour advanced notice to the downstream POTW.

Due to the health risks associated with direct exposure to metam sodium treatment solutions and the rapidly formed degradate MITC, it is imperative that collection system workers do not open and enter manholes in areas undergoing treatment. Treatment zones are so long that the root control chemical applicator is unable to view all manholes affected by the treatment, so it is not possible to guarantee worker safety through visual measures alone. Due to the paramount importance of our workers' safety, we urge EPA to ensure that the label notification requirements contain the information necessary to alert wastewater collection system agencies of the potential danger, so they and applicators can appreciate the critical need to restrict workers from entering manholes and the collection system downstream from treatment areas.

Conclusion

Our goal in submitting this letter is to ensure that metam sodium product label instructions provide the necessary time and information to be effective in protecting our treatment processes and our workers' safety.

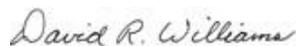
If there is anything that our member agencies or our national association, the National Association of Clean Water Agencies (NACWA) can do to clarify our request or to discuss alternative language to meet our goals, please do not hesitate to contact us.

Thank you for your consideration of our comments. If you have any questions, please contact BACWA's Project Managers:

Karin North
City of Palo Alto
(650) 329-2104
Karin.north@cityofpaloalto.org

Autumn Cleave
Wastewater Enterprise, San Francisco
(415) 695-7336
acleave@sfwater.org

Respectfully Submitted,



David R. Williams, P.E.
Executive Director
Bay Area Clean Water Agencies

cc: Yu-Ting Guilaran, Director, Pesticide Re-Evaluation Division
Rick P. Keigwin, Jr., Director, EPA OPP
Tracy Perry, EPA OPP Pesticide Re-Evaluation Division
Kevin Costello, Branch Chief, EPA OPP, Pesticide Re-Evaluation Division (PRD)
Andrew Sawyers, Director, EPA Office of Water, Office of Wastewater Management
Tomas Torres, Director, Water Division, EPA Region 9
Nicole Zinn, Risk Management and Implementation Branch 2, (PRD)
Shalu Shelat, Risk Assessment Branch 6, Health Effects Division (HED)
Julie Van Alstine, Risk Assessment Branch 6, Health Effects Division
Laura Parsons, Risk Assess. and Science Support Branch, Antimicrobials Division
Timothy Dole, RASSB, Antimicrobials Division
Alicia Denning, RASSB, Antimicrobials Division
Megan Snyderman, Risk Management Branch II, Antimicrobials Division
Timothy Leighton, RASSB, Antimicrobials Division
Chris Schlosser, Risk Assessment Branch VI, HED
Sheila Piper, Risk Assessment Branch VI, HED
Kristen Rickard, Health Effects Division
Wade Britton, Health Effects Division
Richard Fehir, Risk Management Branch II, Antimicrobials Division
Debra Denton, EPA Region 9
Patti TenBrook, EPA Region 9

Karen Mogus, California State Water Resources Control Board
Philip Crader, California State Water Resources Control Board
Paul Hann, California State Water Resources Control Board
Jodi Pontureri, California State Water Resources Control Board
Matthew Freese, California State Water Resources Control Board
Tom Mumley, California Regional Water Quality Control Board, SF Bay Region
Janet O'Hara, California Regional Water Quality Control Board, SF Bay Region
Rene Leclerc, California Regional Water Quality Control Board, SF Bay Region
James Parrish, California Regional Water Quality Control Board, SF Bay Region
Debbie Phan, California Regional Water Quality Control Board, SF Bay Region
Nan Singhasemanon, California Department of Pesticide Regulation
Jennifer Teerlink, California Department of Pesticide Regulation
Kelly D. Moran, Urban Pesticides Pollution Prevention Partnership
Chris Hornback, National Association of Clean Water Agencies
Cynthia Finley, Regulatory Affairs, National Association of Clean Water Agencies
BACWA Pesticides Workgroup
BACWA Executive Board