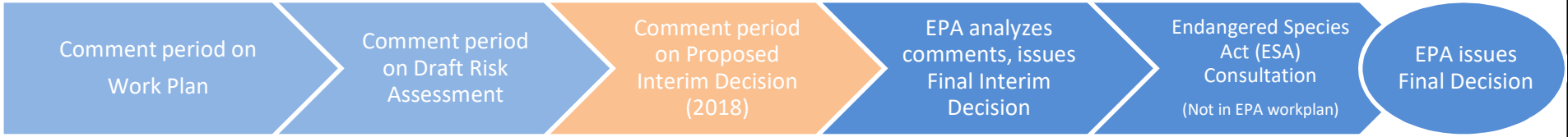
**Pesticide:** **Pyriproxyfen,** EPA-HQ-OPP-2011-0677
**Use**: Pet flea control and indoor/ outdoor insecticide used to control fleas, roaches, and ants.
**Why we care**: The EPA's ecological risk assessment found significant chronic risks to aquatic invertebrates. The EPA has not agreed to the request to perform a "down-the-drain" model for this pesticide.
**Actions taken:** BACWA, NACWA, and SF Bay Water Board sent EPA comments on the Proposed Interim Decision in March 2018.
**Status:** EPA released the Proposed Interim Registration Review Decision in February 2018.




**Next steps:** EPA will analyze comments and issue a Final Interim Decision. ESA Consultation is required but unlikely to begin before 2022.
**Recommendation:** No action is useful at this time. Keep on tracking list and watch for future ESA consultation process.

| BACWA Comments to EPA | EPA Response | Did EPA incorporate BACWA's comment? |
|---|---|---|
| BACWA seeks to ensure that the ERA's freshwater invertebrate toxicity analysis adequately represents POTW toxicity screening. It is possible that the results in the Environmental Risk Assessment (ERA) underestimate risks of POTW toxicity testing failures, based as on the limited species that the EPA has analyzed in the ERA. | EPA noted that it had done its analysis "consistent with requirements as described in 40 CFR Part 158, and consistent with the Office of Chemical Safety and Pollution Prevention (OCSPP) guidelines for testing needed to support pesticide registrations." EPA agreed that there may be varying species sensitivity that may or may not be fully represented by the test species it used but declined to include other species in its analysis. (Note: This is an illustration of the differences in toxicity testing requirements that exists between Office of Water and Office of Pesticide Programs.) | NO |
| BACWA is concerned that risks associated with indoor pyriproxyfen use were not examined in the ERA and respectfully asks the EPA to include this analysis (a "down the drain" risk assessment) in the revised assessment. EPA has POTW predictive modeling tools which are suitable for conducting this assessment and has conducted similar assessments for many other pesticides. BACWA requested that EPA specifically analyze sewer discharge sources such as: pet spot-ons, | In its June 2018 Response to Comments on the Preliminary ERA, EPA notes that: "EFED (Environmental Fate and Effects Division) agrees that use of pet flea control products containing pyriproxyfen may contribute to influent pesticide load at wastewater treatment plants, and if not adequately removed by wastewater treatment, may lead to some contamination of aquatic ecosystems." However, EPA then goes on to note that it thinks its POTW model is not as accurate as EPA's outdoor model—and since (in EPA's view) outdoor use is likely to drive | NO |

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|---|---|---|
| collars, and topical drops; pet shampoos; carpet and upholstery sprays, powders, and foams; home treatment aerosols, sprays and foggers. | exposure--that the “down-the-drain” model is not necessary to estimate maximum environmental exposures. (Note: For many pet flea control chemicals [fipronil, imidacloprid], POTW effluent concentrations are higher than urban runoff concentrations.) | |
| BACWA requested that the Office of Pesticide Programs (OPP) conduct its risk-benefit evaluation for pet flea control products as a group (i.e. considering pyrethroids, imidacloprid, indoxacarb, and fipronil, which are also undergoing Registration Review) and in the context of the broad range of available non-pesticide alternatives, including FDA-approved oral medications and mechanical controls (e.g., vacuuming, washing of pet bedding). BACWA suggested that EPA consider the following additional risk mitigation strategies for indoor pyriproxyfen products: 1) Determine the minimum application rate necessary to achieve pest control for indoor uses like pet flea control. This would eliminate unnecessary overuse and minimize POTW discharge quantities. 2) Consider adding wastewater-protective use restrictions to product labels—such as dissuading pet owners from washing their pets for two weeks after applying | EPA says risk mitigation is not warranted because “a screen of available surface water monitoring data from California does not show a high detection frequency of pyriproxyfen” and “(d)ata from California Department of Pesticide Regulation from 2017 measuring pyriproxyfen concentrations in wastewater treatment plants and sewershed samples do not show detections of pyriproxyfen.” (PID, p. 8) (Note: EPA only does risk mitigation for identified significant risks. Since EPA did not assess risks associated with POTW discharges, it had no basis to explore risk mitigation. The cited surface water data may not include any monitoring data downstream from POTW discharges. They did not give any consideration to POTW-specific regulatory issues, such as effluent toxicity.) | NO |