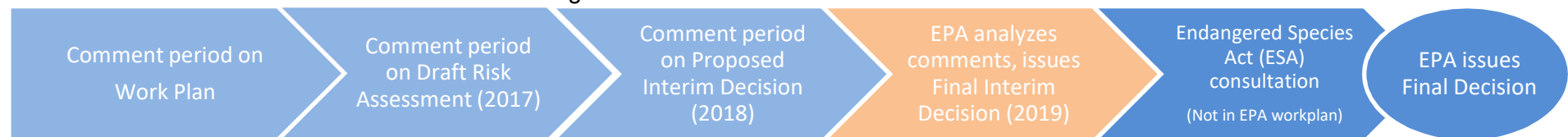


Pesticide: Indoxacarb, EPA-HQ-OPP-2013-0367
Use: Pet flea control; also used directly in sewers and storm drains.
Why we care: High aquatic toxicity. EPA should be assessing POTW discharge risks of pet flea control products.
Actions taken: CASQA, the SF Bay Water Board, and the Central Valley Water Board commented on the Draft Work Plan in 2013. BACWA, CASQA, Tri-TAC, and the SF Bay Water Board commented on the Draft Risk Assessment in November 2017.
Status: EPA released the Final Interim Registration Review Decision in March 2019.



Next steps: ESA consultation is required but unlikely to begin before 2022.

Recommendation: Keep on tracking list and watch for future ESA consultation process.

| BACWA Comments to EPA | EPA Response | Did EPA incorporate BACWA's comment? |
|---|---|--------------------------------------|
| BACWA requested that EPA do a “down the drain” risk assessment, that includes sewer discharge sources such as pet flea control products. | In the April 23, 2018 “Indoxacarb: Response to Comments on the Preliminary Risk Assessment,” EPA states that since that their models results showed uncertainties in the concentrations during modeling of pyrethroids, that it does not think it will produce accurate results for indoxacarb, so it will not try to model “down the drain” for indoxacarb. EPA also notes that it “believes that the risks identified from the outdoor uses of indoxacarb result in higher exposure and [higher] environmental risk than would be expected from the pet spot on treatments and sewer manhole uses.” (Note: For some pet flea control chemicals (fipronil, imidacloprid), POTW effluent concentrations are higher than urban runoff concentrations.) | NO |
| BACWA requested that EPA also assess and model the impact of products that are permitted for the direct use of indoxacarb in sewers and manholes. | EPA responded that “indoxacarb application to sewers and manholes is more of a crack and crevice application (around the manhole; above the water line) rather than a direct or general application to the sewer system.” | NO |
| BACWA requested that EPA conduct a risk-benefit evaluation for pet flea control products as a group and determine the minimum | EPA noted in the proposed interim decision that “pet spot-on treatments for fleas were not considered in the | NO |

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| application rate necessary as well as considering adding wastewater-protective use restrictions to labels (such as dissuading pet owners from washing pets for two weeks after treatments). | assessment because they are considered to have low exposure potential.” | |
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