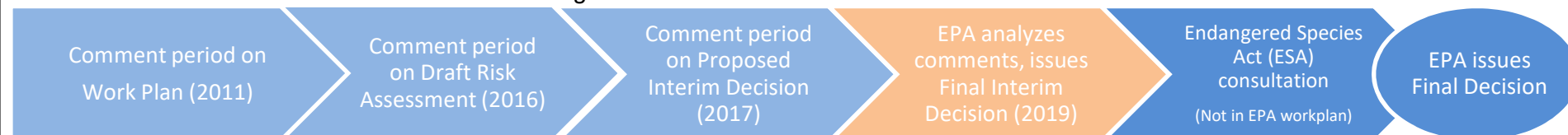


**Pesticide:** **Spinetoram** EPA-HQ-OPP-2011-0666  
**Use:** Pet flea control (cats)  
**Why we care:** High aquatic toxicity and highly toxic degradates. Persistent in aquatic ecosystems. EPA should be assessing POTW discharge risks of pet flea control products.  
**Actions taken:** CASQA and the SF Bay Water Board commented on the Draft Work Plan in 2011. BACWA and NACWA commented on the Draft Risk Assessment in 2016.  
**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?
<p>BACWA requested that EPA do a “down the drain” risk assessment, that includes sewer discharge sources such as pet flea control products. Model refinements should include:</p> <ol style="list-style-type: none"> <li>1) <i>Adjust consumer product discharge estimates to reflect geographic and seasonal use</i></li> <li>2) <i>Update per capita water use to account for conservation</i></li> <li>3) <i>Assume zero dilution</i></li> <li>4) <i>Improve POTW removal estimates</i></li> <li>5) <i>For pesticides likely to partition to sediment, include a biosolids analysis</i></li> </ol>	<p>In its April 17, 2017 Response to Comments memorandum, EPA stated that “the spot treatment on cats is considered de minimis exposure to the environment as indicated by preliminary modeling” and that “due to the lack of production volume, EPA’s Environmental Fate and Effects Division (EFED) made an estimate by extrapolating the agricultural usage of spinosad.” EPA then fed this estimate based on agricultural usage of spinosad into its Sewage Treatment Plant Fugacity Model. EPA also noted in the 2017 Proposed Interim Decision that “<i>Spinetoram can be applied to cats as spot treatment to control fleas. The Agency (EPA) made conservative estimates of concentrations of spinetoram in treated water associated with the use on cats. These estimates resulted in a maximum RQ of 0.02 for chronic exposure to freshwater invertebrates, and acute and chronic RQ values for all aquatic taxa are substantially lower than 0.02. Acute and chronic risk concerns for aquatic plants and animals resulting from indoor uses of spinosad (including cat spot treatments) are considered very low,</i></p>	<p>No, EPA did not consider updating its model to more accurately model a “down the drain” assessment that includes pet flea control discharges to the sewer.</p>

	<i>and EPA does not consider risk mitigation to be necessary.”</i>	
BACWA requests that for pet flea control products, the risk mitigation options be evaluated in the context of available non-pesticide alternatives.	The EPA did not address this comment.	No