



December 22, 2020

Cody Kendrick
Office of Pesticide Programs (OPP)
Regulatory Public Docket Center (28221T)
U.S. Environmental Protection Agency (EPA)
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001

Subject: Methoprene – Combined Final Work Plan and Proposed Interim Registration Review Decision (EPA-HQ-OPP-2013-0586)

Dear Mr. Kendrick:

On behalf of the Bay Area Clean Water Agencies (BACWA), we thank you for the opportunity to comment on the Combined Final Work Plan and Proposed Interim Registration Review Decision (PID) for methoprene. 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 that are used in manners that have transport pathways to the sanitary sewer, as even the most sophisticated wastewater treatment plants cannot fully remove complex chemicals like pesticides.

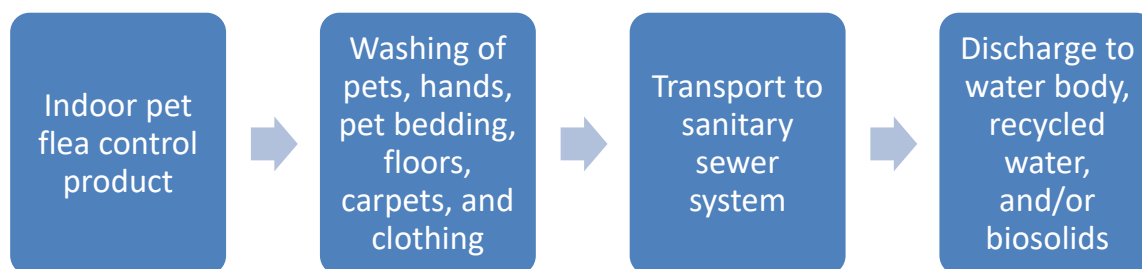
BACWA has a strong interest in methoprene due to use in pet flea control and abandoned swimming pool products. The purposes of this letter are: (1) to request that the qualitative discussion of sewer discharges in the Proposed Interim Decision be replaced with a quantitative (i.e., modeled) down-the-drain evaluation addressing discharges of methoprene to the sewer due to companion animal treatments and (2) to request that the PID require registrants to include the same swimming discharge instructions on methoprene products that are being required by EPA on all other pool products (e.g., lithium hypochlorite, copper, chlorine, haloxydantoin, terbutylazine, inorganic halides, zinc salts, boric acid/sodium salts) as suggested by BPPD's own risk assessors.¹

¹ Jones, R.S., Risk Assessment Branch, Biopesticides and Pollution Prevention Division (2020). Revised Response to Comments Received on the Amended Preliminary Work Plan for Methoprene, Kinoprene and Hydroprene, Docket ID No. EPA-HQ- OPP-2013-0586, Case Number 0030. Page 6.

BACWA requests that EPA complete a quantitative (i.e., modeled with E-FAST) down-the-drain evaluation addressing discharges of methoprene to the sewer due to companion animal treatments

Pet flea control chemicals are transported within a home to an indoor drain that flows to a POTW via the pathways illustrated in Figure 1. This pathway is well documented.²

Figure 1. Methoprene Pathway: From Pet Treatments to Wastewater Discharge



EPA’s rationale for skipping a down-the-drain assessment (Page 6 of responses to comments)³ is based entirely on a risk assessment of outdoor methoprene applications that flow to surface waters via an outdoor drainage systems. Assessing POTW discharges based on outdoor use is not scientifically appropriate. Discharges of methoprene to POTWs have no connection to outdoor methoprene uses nor to the fate and transport of methoprene applied outdoors. The type of applications are different indoors (i.e., companion animal treatments). The fate and transport are different (i.e., underground wastewater collection system pipes to POTWs – places without sunlight).

BACWA respectfully asks the EPA to conduct a quantitative “down-the-drain” risk assessment addressing methoprene uses that result in discharges to the sewer system. Such assessments are not difficult. EPA has a POTW predictive modeling tool (E-FAST) that is suitable for conducting this assessment and has conducted similar assessments for many other pesticides. California DPR has sales data for pet flea control products that could be scaled up for use in the assessment. (Using total nationwide sales data for all methoprene products, as EPA sometimes does in E-FAST assessments, would not accurately estimate risks since it is not specific to pet flea control products). Such an assessment is the appropriate means of evaluating risks to POTWs and to surface waters.

² See for example Sadaria, A.M. et al. 2017. Passage of Fiproles and Imidacloprid from Urban Pest Control Uses Through Wastewater Treatment Plants in Northern California. *Environmental Toxicology and Chemistry*. 36 (6), 1473-1482; Teerlink, J., J Hernandez, R Budd. 2017. Fipronil washoff to municipal wastewater from dogs treated with spot-on products. *Sci Total Environ* 599-600: 960-966; and citations in BACWA’s prior correspondence to US EPA on fipronil, imidacloprid, and pyrethroids Registration Review.

³ Jones, R.S., Risk Assessment Branch, Biopesticides and Pollution Prevention Division (2020). Revised Response to Comments Received on the Amended Preliminary Work Plan for Methoprene, Kinoprene and Hydroprene, Docket ID No. EPA-HQ- OPP-2013-0586, Case Number 0030. Page 6.

BACWA Requests Revised Swimming Pool Product Labeling Consistent with Other Swimming Pool Pesticide Products

We request that methoprene products be required to follow the precedent for improved labels for swimming pool, spa, hot tub, and fountain products that was established by the decisions for other pool, spa, hot tub, and fountain chemicals, such as lithium hypochlorite, copper, chlorine, halohydrantoin, terbutylazine, inorganic halides, zinc salts, and boric acid/sodium salts . In those Registration Review decisions, EPA worked carefully through the various issues to develop practical label language that mitigates possible aquatic impacts from discharge of treated pool, spa, and hot tub water, while preventing excess flows into sewer collection systems.

BACWA requests that the current methoprene abandoned swimming pool product label language be changed to match the other pool product labels, which would provide consistent label language across pool, spa, hot tub, and fountain chemicals.

“Before draining a treated [pool,] [spa,] [hot tub,] or [fountain,] contact your local sanitary sewer and storm drain authorities and follow their discharge instructions. Do not discharge treated [pool,] [spa,] [hot tub,] or [fountain] water to any location that flows to a gutter, storm drain or natural water body unless discharge is allowed by state and local authorities.”

EPA needs to include this label requirement in the PID to ensure that it is fully and consistently implemented across all products in this class.

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
San Francisco Public Utilities Commission
(415) 695-7336
ACleave@sfgwater.org

Respectfully Submitted,



Lorien Fono, Ph.D.
Executive Director
Bay Area Clean Water Agencies

cc: Edward Messina, Acting Director, EPA OPP
Anita Pease, Director, Antimicrobials Division, EPA OPP
Anne Overstreet, Acting Director, Biopesticides and Pollution Prevention Div., EPA OPP
Seiichi Murasaki, Microbial Pesticides Branch, EPA OPP

Shannon Borges, Biopesticides and Pollution Prevention Div., EPA OPP
Geoffrey Sinclair, Biopesticides and Pollution Prevention Div., EPA OPP
Andrew Sawyers, Director, EPA Office of Water, Office of Wastewater Management
Deborah Nagle, Director, EPA Office of Water, Office of Science and Technology
Tomas Torres, Director, Water Division, EPA Region 9
Debra Denton, EPA Region 9
Patti TenBrook, EPA Region 9
Kathryn Meyer, EPA Region 9
Karen Mogus, Deputy Director, California State Water Resources Control Board
Philip Crader, Assistant Deputy Director, California State Water Resources Control Board
Richard Breuer, 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, San Francisco Bay Region
James Parrish, California Regional Water Quality Control Board, SF Bay Region
Debbie Phan, California Regional Water Quality Control Board, San Francisco Bay Region
Jennifer Teerlink, California Department of Pesticide Regulation
Aniela Burant, California Department of Pesticide Regulation
Cynthia Finley, Director, Regulatory Affairs, National Association of Clean Water
Agencies
Chris Hornback, Chief Technical Officer, National Association of Clean Water Agencies
Kelly D. Moran, Urban Pesticides Pollution Prevention Partnership
BACWA Executive Board
BACWA Pesticides Workgroup