

Pesticide: Methoprene EPA-HQ-OPP-2013-0586
Use: Pet flea control. Also used in “abandoned” swimming pools.
Why we care: BACWA is concerned about pet flea products pathway to the sewer and POTWs. BACWA is also concerned about discharges to the sewer of pool water containing methoprene.
Actions taken: BACWA sent a comment letter on the Preliminary Work Plan to EPA on March 24, 2020.
Status: EPA released the Combined Final Work Plan and Proposed Interim Registration Review Decision in November 2020. Comments are due on December 22, 2020.



Next steps: EPA will issue a Final Interim Decision.

Recommendation: Submit a letter again requesting the pool discharge label language and reiterating pet flea control objections for the record.

BACWA 03/24/2020 Comments to EPA	EPA Response	Did EPA incorporate BACWA's comment?
<p>BACWA requests that the work plan be expanded to include an evaluation of sewer discharges from pet flea control treatments and other indoor...uses. BACWA is concerned that an evaluation of risks associated with indoor uses of these three chemicals was not included in the workplan and respectfully asks the EPA to include this analysis (a “down the drain” risk assessment) in the risk assessment. EPA has POTW predictive modeling tools that are suitable for conducting this assessment and has conducted similar assessments for many other pesticides. We request that EPA specifically analyze sewer discharge sources such as: Pet spot-ons (and) All other indoor treatments... Monitoring data for pet flea control chemicals in POTW influents and effluents show higher concentrations in northern California POTWs (Sadaria et al 2017)...According to Sadaria et al 2017: “Higher overall concentrations and detection frequencies in effluent from northern California may reflect regional, seasonal, and/or climate-related differences from other sampled facilities, such as lower dilution caused by drought-related water use reductions, presence of pests during all seasons because of the mild coastal climate, and pesticide use responding to regional pest pressures (e.g., high</p>	<p><i>“The Agency does not anticipate the need for any new environmental risk assessments or endangered species risk assessments in support of the Amended Preliminary Workplan (APWP) for Methoprene...Recent comments on the APWP requested that the Agency expand its environmental and endangered species risk assessments to consider impacts on aquatic organisms resulting from indoor uses that are likely to discharge into municipal sewer system (“down-the-drain,” or DtD concerns), as well as discharges from catch basins and abandoned swimming pools...The Agency considered all comments to the APWP, but believes that previous risk assessments, in particular the one conducted in support of a pesticide effects determination for the California Red-legged frog [CRLF (U.S. EPA, 2008)], are sufficient to address all registered uses of S-methoprene that would result in discharges into municipal sewer systems (“down-the-drain,” or DtD concerns) resulting from indoor uses of S-methoprene. Although the</i></p>	<p>No.</p>

<p>flea populations in California coastal areas).” BACWA requests that EPA methoprene modeling and mitigation approaches account for these factors.</p>	<p><i>pesticide determination for the CRLF (U. S. EPA, 2008) did not specifically evaluate registered uses on pets (e. g. shampoos and collars), stored grains, hospital premises, cemeteries, industrial waste disposal systems, and other potential DtD indoor uses, the likelihood for environmental exposure is expected to be negligible...”</i> (Revised Response to Comments Received on the Amended Preliminary Work Plan for Methoprene, Kinoprene and Hydroprene 7/29/2020, page 2-4)</p>	
<p>In light of these findings, BACWA requests that 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).</p>	<p>No response.</p>	<p>No.</p>
<p>BACWA suggests that...EPA consider the following additional risk mitigation strategies for indoor methoprene products:</p> <ul style="list-style-type: none"> • Determine the minimum application rate necessary to achieve pet flea control. This would eliminate unnecessary overuse and minimize POTW discharge quantities... • Add schematic graphic to labels indicating that methoprene products like pet flea treatments should not be dumped down drains. US EPA has proposed that pyrethroid insecticide products carry a graphic showing an image of an “X”...over a drain on product packages. Methoprene, Kinoprene, and Hydroprene products should also carry these graphics... • Require removal of any label language on pet spot-on products that encourages washing and water exposure of treated pets. Label statements such as “water proof” should be removed. All labels should dissuade owners from washing their pets for at least 2 weeks after treatment. • Consider eliminating indoor aerosols products, which disperse chemicals in a way that significantly increases the likelihood that the active ingredient would be transported to the sanitary sewer, such as through mopping of floors. In contrast, containerized baits are unlikely allow sewer discharges. 	<p><i>“Requests also were made for the addition of certain restrictive language and a graphic warning to the product labels of methoprene products. The addition of restrictive label language and/or graphic warnings to product labels, except where specifically noted in this document, are outside the scope of this review and will be addressed elsewhere.”</i> (Revised Response to Comments Received on the Amended Preliminary Work Plan for Methoprene, Kinoprene and Hydroprene 7/29/2020, page 2)</p>	<p>No. The response is at odds with other OPP decisions, which establish required label language. There is no other process to ensure that all labels for a specific active ingredient include protective requirements for specific uses.</p>