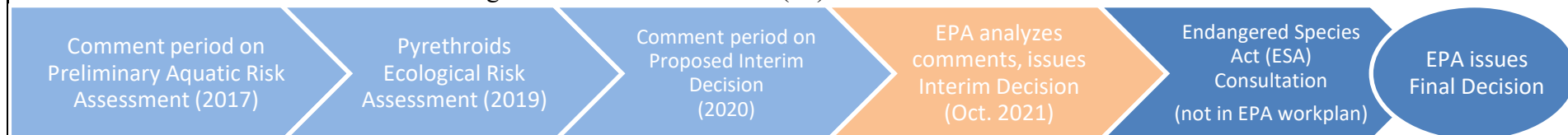


**Pesticides:** Cyhalothrins (Gamma and Lambda) – EPA–HQ–OPP–2010–0479 and EPA–HQ–OPP–2010–0480  
**Use:** Insecticide. Indoor and pet uses.  
**Why we care:** Priority pesticide due to toxicity, use, and monitoring data. Pyrethroids have multiple 303(d) listings and TMDLs.  
**Actions taken:** BACWA submitted a comment letter on the Preliminary Ecological Risk Assessment (July 2017), the Ecological Risk Mitigation (February 2020), and the Proposed Interim Decision (January 2021).  
**Status:** EPA released the Interim Registration Review Decision (ID).



**Next steps:** EPA will complete an endangered species determination and any necessary consultation with the Services. EPA will also review the pesticide under the Endocrine Disruptor Screening Program.

**Recommendation:** No action needed at this time as there is no open comment period.

| BACWA Comments to USEPA (1/11/2021)   | USEPA Response (emphasis added)  | Did USEPA consider BACWA's comments? |
|---|--|--------------------------------------|
| <p><b>Pyrethroids and Pyrethrins Have Differing Ecological Risks – Some – Including Cyhalothrins – Warrant Additional Mitigation Measures</b></p> <p>EPA's Pyrethroids and Pyrethrins Ecological Risk Assessment identified very different risks from POTW discharges of individual pyrethroids and pyrethrins (based on EPA "level of concern" [LOC] exceedances – see EPA summary table which shows relatively high LOC values for Cyhalothrins). Despite finding substantial (orders of magnitude) differences in aquatic risks among the pyrethroids and pyrethrins, EPA issued a single risk mitigation proposal with only one set of measures covering all 23 pyrethroids and pyrethrins.</p> <p>BACWA appreciates that EPA's joint pyrethroids/pyrethrins ecological risk mitigation proposal reaffirms EPA's finding that pyrethroids discharges to municipal wastewater systems pose ecological risks that</p> | <p><i>"The Agency has decided <b>not to develop unique chemical-specific ecological risk mitigation for lambda-cyhalothrin and gamma-cyhalothrin at this time beyond what is already required as part of this ID. The Agency concludes that lambda-cyhalothrin and gamma-cyhalothrin provide <b>high benefits for controlling pests in indoor residential areas, outdoor urban areas, in agricultural crop production, and as an adult mosquito adulticide to control vectors for human disease. The Agency is requiring risk mitigation primarily to address risk to non-target invertebrates and fish. However, risks may remain to non-target organisms even after mitigation. Any remaining risks are outweighed by the benefits of lambda-cyhalothrin and</b></b></i></p> | <p>No.</p>                           |

|  |   |            |
|--|---|------------|
| <p>should be mitigated. While we note that EPA has proposed product label improvements toward preventing incidents like dumping unused products, we are disappointed that EPA did not lay out a specific plan to address the main problem – continuous discharges associated with ordinary use of pyrethroids. Due to this gap, EPA’s joint pyrethroids/pyrethrins ecological risk mitigation proposal does not include measures that we anticipate will reduce daily discharges or provide measurable reduction in typical POTW discharge risk.</p> | <p><i>gamma-cyhalothrin use. <b>In addition, the Agency notes that all states, including California, are authorized to restrict pesticide use according to state requirements and standards.</b> For a more detailed response to submitted water quality comments, please see the Pyrethroids and Pyrethrins Revised Ecological Risk Mitigation and Response to Comments on the Ecological Risk Mitigation Proposal For 23 Chemicals (September 30, 2020).” (EPA ID, pp. 14-15)</i></p>   |            |
| <p>EPA’s Sweeping Ecological Risk/Benefit Finding Should Be Revised to Differentiate Among the 23 Pyrethroids and Pyrethrins and Among the Various Indoor Uses of the 23 Chemicals</p>   | <p><i>“The Agency appreciates the comments from CASQA, SFBRWQCB, and BACWA. The Agency issued a single risk mitigation proposal to address ecological risks for 23 pesticides, which encompass the pyrethrins, synthetic pyrethroids, and pyrethroid-like insecticides, because they exhibit a common insecticidal mode of action and show similar ecological effects. Additionally, <b>assessing these pesticides as a group would ensure a consistent approach to mitigating potential ecological risk, including providing equity to stakeholders, when implementing regulatory changes for pesticides in this group.</b>” (EPA ID, p. 14)</i></p> | <p>No.</p> |