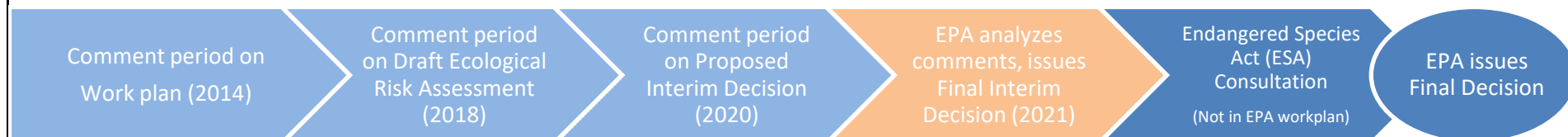


**Pesticide:** Metam Sodium; EPA-HQ-OPP-2013-0140  
**Use:** Root control product.  
**Why we care:** Metam sodium (in sewer root control foams) and its degradate MITC are safety hazards to workers inadvertently entering lines undergoing treatment, can cause treatment process interference, and has historically contained trace nitrosodimethylamine (NDMA), a suspected human carcinogen.  
**Actions taken:** BACWA submitted a comment letter on the Proposed Interim Decision on January 17, 2020.  
**Status:** EPA released the Interim Decision in October 2021.



**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 EPA   | EPA Response  | Did EPA consider BACWA's comment?   |
|---|---|---|
| <p>BACWA supports the proposed updated label language detailed in the Proposed Interim Decision regarding updating metam sodium root control product labels to require notification of publicly owned treatment works (POTWs) at least 24 hours prior metam sodium applications to protect worker safety.</p> <p><i>“Applicators must notify downstream waste water treatment facilities <b>at least 24 hours</b> prior to the start of metam sodium applications so <b>they can protect worker safety by restricting staff from entering downstream collection system lines</b> and that they may monitor the operations of the wastewater treatment plant. Applicators must report how much product will be applied to the sewage system to operators of downstream water treatment plants and inform these operators that high concentrations of these chemicals in wastewater may adversely affect the biological sewage breakdown process in wastewater treatment plants.”</i></p> | <p><i>“The Agency thanks BACWA, San Francisco Bay Regional Quality Control Board, and NACWA for their comments and confirmation that the updated sewer root treatment application language will help protect worker safety.” (EPA ID, p. 9)</i></p> | <p>Yes. These edits reflect the exact label language edits that BACWA recommended in response to the 2018 Risk Assessment (BACWA letter dated January 29, 2019). This was BACWA's single request in the comment letter. Subsequently the PID and ID have incorporated this language without further modification.</p> |