

Pesticide: Novaluron (EPA-HQ-OPP- 2015–0171)
Use: Pet products (carpet shampoos, furniture/pet bedding sprays, foggers, broadcast sprays); flying insect treatment (including treatment directly into drains, as well as cracks and crevices); also used to treat “pests of stored products” such as in kitchens.
Why we care: Toxic to aquatic invertebrates.
Actions taken: BACWA sent a comment letter to EPA on July 6, 2020 (Draft Risk Assessment) and May 17, 2021 (PID).
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 5/17/2021 Comments to EPA | EPA Response (emphasis added) | Did EPA consider BACWA’s comment? |
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| In its 2020 Draft Environmental Risk Assessment, EPA stated that POTW discharge analysis is unnecessary because agricultural discharge would be representative of POTW discharge. We fail to understand how modeling agricultural novaluron applications and subsequent runoff from a treated agricultural field could provide any scientific insights on the discharges of novaluron into the sewer system and its subsequent passage through POTW treatment processes... POTW modeling is needed to inform POTW-specific mitigation measures...EPA’s Environmental Fate and Effects Division (EFED) can use the detailed label analysis tables developed by EPA’s Biological and Economic Analysis Division (BEAD) to identify uses with pathways to POTWs. | <p><i>“The Agency would like to thank BACWA and SFWB for their comments on the POTW pathway for pesticide exposure to receiving waters. Down-the-drain exposure modeling is highly uncertain and therefore not often useful for precisely estimating potential concentrations in waste water. Available localized monitoring data on POTW influent and effluent would be a stronger line of evidence for evaluating this exposure pathway. After reviewing the comments, the Agency has added additional stewardship language to the label mitigation that will address the potential for down-the-drain exposure from products containing novaluron.” (EPA ID pp.7-8)</i></p> <p><i>Necessary Labeling Changes for Novaluron Products (EPA ID, pp. 31-32):</i></p> <ul style="list-style-type: none"> • <i>Designate “for indoor use only”, “for both indoor and outdoor use”.</i> | <p>Partially.</p> <p>In line with other recent decisions, EPA continues to ignore requests for down-the-drain modeling.</p> <p>EPA did include several label changes that BACWA suggested on other comment letters</p> |

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| | <ul style="list-style-type: none">• <i>“Do not pour or dispose of down the drain or sewer. Call your local solid waste agency for local disposal options.”</i>• <i>“Do not allow to enter indoor or outdoor drains (unless labeled for drain treatments).”</i>• <i>“Follow proper disposal procedures on this label”</i>• <i>Use the following pictogram on product labels:</i> | |
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