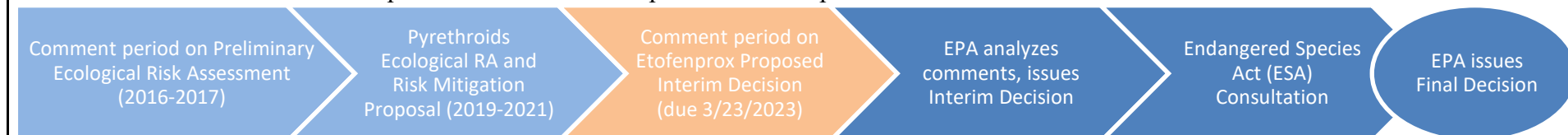


Pesticides: Etofenprox, EPA–HQ–OPP–2007–0804
Use: Insecticide. Indoor and pet uses.
Why we care: Priority pesticide due to toxicity, use, and monitoring data. Pyrethroids have multiple 303(d) listings and TMDLs.
Actions taken: BACWA submitted a comment letter on the Preliminary Ecological Risk Assessment (July 2017), the Ecological Risk Mitigation (February 2020), and the Proposed Risk Mitigation (January 2021).
Status: EPA released a Proposed Interim Decision specific to etofenprox.



Next steps: EPA will release the Interim Decision for Etofenprox. As a separate effort, EPA will address the proposed new uses of etofenprox.

Recommendation: We recommend that BACWA draft a response letter to EPA on the etofenprox PID.

BACWA Comments to EPA (2/12/20) on the Pyrethroids and Pyrethrins Ecological Risk Mitigation Proposal for 23 Chemicals	EPA Response	Did USEPA consider BACWA's comments?
EPA's Sweeping Risk/Benefit Finding Should Be Revised to Differentiate Among the 23 Pyrethroids and Pyrethrins and Among the Various Indoor Uses of the 23 Chemicals. While we agree that there are societal benefits from some pesticide uses like public health pest control, the Ecological Risk Mitigation Proposal treats all indoor uses and all 23 chemicals as having equal costs and benefits. This is untrue. All indoor pyrethroids and pyrethrins uses are not equal in their societal benefits. Because the pyrethroids and pyrethrins do not have equal ecological risks, they do not have equal impacts on POTWs. A more nuanced approach to completing EPA's statutory obligation to weigh the societal costs and benefits of the 23 pyrethroids and pyrethrins would better serve our nation.	EPA drafted a PID specific to etofenprox.	Yes.
BACWA Requests That EPA Provide a Schedule and a Specific Plan to address POTW Discharge Ecological Risks from Pet Spot-Ons and Other Topical Pet Treatments. Prior EPA documents stated that there is a larger effort regarding efficacy of pet products being handled via Proposed Guidelines for	EPA did not create a specific plan to address POTW discharge ecological risks from pet spot-ons nor did they clarify the linkage between this	No.

<p>Efficacy Testing of Topically Applied Pesticides Used Against Certain Ectoparasitic Pests on Pets (“Proposed Guidelines”). BACWA asked EPA to clarify linkages between those guidelines and ecological risks posed by the post-application transfer of pet flea control chemicals to municipal wastewater treatment plants.</p> <p>BACWA requested that that EPA provide a plan and schedule to address POTW discharge ecological risks from pet spot-ons and shampoos. We requested that the plan have the specific, stated goals of eliminating unnecessary use of pyrethroids and pyrethrins and to minimize POTW discharge quantities. We requested that the plan include the following elements: (1) A schedule for completion of the Proposed Guidelines (2) A requirement for testing of all pyrethroid and pyrethrins-containing topically applied pesticides (including pet spot-ons, shampoos, and other products like sprays and dusts) in accordance with the final version of the Proposed Guidelines, conducted with multiple application quantities, to determine the minimum necessary application quantity (by pet size). (3) A requirement for products to be relabeled or reformulated such that applications do not use excess active ingredient (i.e., more than necessary to control pests).</p>	<p>registration process and the Proposed Guidelines.</p>	
<p>EPA Proposed Label Clarifications – Pictograms, Stewardship Statement, and Spanish Language – Support with Modifications</p> <p>BACWA supports the concept of a graphic showing an image of an “X” –or better the “do not” symbol – over a drain on product packages. ... We appreciate EPA’s example, but cannot support the use of the EPA graphic due to lack of clarity, particularly when the image is reduced in size to fit on smaller packaging. We request that EPA please select a clear, schematic graphic that is very obvious as to what is prohibited. We would be pleased to work with EPA, our national association NACWA, and registrants toward selecting an appropriate graphic. An example of a preferred schematic graphic is below (courtesy of Dublin San Ramon Sanitary District). To ensure that these label elements completely and effectively address products that may be discharged “down-the-drain” into municipal wastewater collection systems, we request that EPA modify the “label table” in Appendix B to: 1. Identify</p>	<p>EPA used BACWA’s suggested pictogram, used BACWA’s proposed minimum sizing for graphic, and included Spanish translation. (EPA Etofenprox PID, Appendix B: Proposed Labeling Changes for Etofenprox Products)</p>	<p>Yes. (Parallel to previous pyrethroid findings.)</p>

<p>a specific graphic and require the same graphic be used on all products. 2. Establish minimum size for the graphic, to ensure that it is legible, i.e., no smaller than 1.5 square centimeters unless this size is greater than 10% of the size of the label. 3. Modify the list of products that must include the graphic, stewardship language, and Spanish translations to specify: a. The graphic, stewardship language, and Spanish are required on all types products - except pet shampoos – that are packaged in a form that could be discharged into a drain (i.e., anything other than an impregnated material like a collar or fly strip). b. The graphic, stewardship language, and Spanish are required on all categories of products, not just those labeled for indoor residential use as indicated in the header on the label table in Appendix B. At a minimum, the label table should be revised to indicate the graphic must be placed on all products labeled for outdoor or indoor use in nonagricultural settings (as indicated in the text on page 39). We would prefer that the graphic be required on all products, as even agricultural and mosquito abatement products are often mixed in facilities with sinks EPA’s Example Indoor Drain Pictogram and floor drains. The graphic, stewardship language, and Spanish are required for all 23 pyrethroids and pyrethrins (not just the subset listed in the left column of the label table in Appendix B), recognizing that all pyrethroids have potential to enter sewer drains. The subset of the 23 chemicals identified for this requirement in Appendix omits pyrethroids (e.g., momfluorothrin) that could also enter sewer drains from indoor residential use.</p>		
<p>BACWA also supports EPA’s proposal to add drain discharge prohibitions (“stewardship statement”) and the Spanish translation of the stewardship statement to product labels. For those products labeled for use directly inside pipes/sinks, instead of EPA’s proposal (“Do not allow to enter indoor or outdoor drains unless labeled for drain treatments.”), we request that EPA instead require the following language, which is more clear and complete: <i>“Do not pour down-the-drain or sewer except when following treatment instructions for [drains] [sewers]”. Call your local solid waste agency for local disposal options.”</i></p>	<p>EPA incorporated BACWA’s comment but neglected to include the Spanish translation. (EPA Etofenprox PID, Appendix B: Proposed Labeling Changes for Etofenprox Products)</p>	<p>Partially. EPA used BACWA’s proposed language but did not include the Spanish translation.</p>

<p>EPA Proposed Label Clarifications – Indoor/Outdoor Use Specification – Support BACWA supports EPA’s proposal to require that product labels specifically state whether particular products are allowed to be used indoors only, outdoors only, or both indoors and outdoors. This will assist with identification of products that may be discharged to the sewer system.</p>	<p>EPA incorporated BACWA’s comment. (EPA Etofenprox PID, Appendix B: Proposed Labeling Changes for Etofenprox Products)</p>	<p>Yes. (Parallel to previous pyrethroid findings.)</p>
<p>BACWA Requests Modification of Pet Washing Label Language on Spot-On Pet Products BACWA requests that EPA require removal of all 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. Please see our prior letter (attached) which provides the scientific basis for this request.</p>	<p>EPA did not respond to this comment. Instead, the proposed mitigation is as follows: <i>“Mitigation to address risks from the indoor use of products containing these chemicals focuses on reducing the amount of residues being poured down-the-drain.”</i></p>	<p>No.</p>
<p>BACWA Requests Additional Label Clarifications for Pet Shampoos To avoid overuse of pet shampoos, BACWA requests that EPA require the labels for all pyrethroids and pyrethrins pet shampoos provide specific application quantities and allowable frequencies of use. Most current shampoo labels do not specify application quantities, even though overuse could potentially harm a pet. Some product labels already contain this information in a handy table (for example see EPA Reg. No.: 2596-177). We suggest that EPA require all shampoos have a table indicating the correct shampoo volume for the pet body weight.</p> <p>Labels provide little or no application frequency information – and sometimes that information is inconsistent. For example, one product label indicates "maximum effectiveness" is achieved by washing a dog every 30 days with the product, but across the front of the label it says, "kills ticks and fleas every 7 days" (EPA Reg. No.: 2517-138).</p>	<p>EPA did not respond to this comment. Instead, the proposed mitigation is as follows: <i>“Mitigation to address risks from the indoor use of products containing these chemicals focuses on reducing the amount of residues being poured down-the-drain.”</i></p>	<p>No.</p>