



October 14, 2024

Anson Main
California Department of Pesticide Regulation (DPR)
1001 I Street
Sacramento, CA 95812-4015
Transmitted via email to Anson.Main@cdpr.ca.gov

Subject: Appreciation for DPR's Updates to the Pesticide Registration Evaluation Model

Dear Anson Main:

On behalf of the Bay Area Pollution Prevention Group Pesticides Committee, a committee of the Bay Area Clean Water Agencies (BACWA), we enthusiastically thank DPR for enhancing the most recent version of the [Pesticide Registration Evaluation Model](#) (PREM6). The updated model more accurately captures potential impacts to municipal wastewater dischargers and aquatic ecosystems.

BACWA is a joint powers agency whose members own and operate publicly-owned treatment works and sanitary sewer systems that collectively provide sanitary services to over seven million people in the nine-county San Francisco Bay Area. Every day, BACWA members provide wastewater treatment for millions of gallons of pesticide-containing wastewater that is discharged to fresh or saltwater bodies, including local creeks and rivers, bays, and the Pacific Ocean. BACWA members take our responsibilities for safeguarding receiving waters seriously.

BACWA appreciates that the PREM updates will help protect California's surface waters by reflecting updated scientific understanding about the linkages between pesticide use and surface water impacts. Specific updates that BACWA is pleased that DPR was able to incorporate into the [updated PREM6 model](#) include:

- **Down-the-Drain** modeling capability to formally evaluate ecological risks for pesticides with indoor uses or down-the-drain disposal pathways, such as pet shampoos, pesticide-preserved textiles, floor drain treatments, and general indoor use insecticides. Compared to the previous informal approach, the new modeling approach will streamline the consideration of factors such as indoor pesticide application rates, wash-off coefficients, and removal efficacy in wastewater treatment plants.
- The inclusion of **chronic toxicity** risk quotients in addition to acute toxicity. Because most Bay Area wastewater treatment plants are required to meet chronic toxicity effluent limitations, it is appropriate to use a similar evaluation when assessing pesticide risk.
- Realistic **dilution scenarios** for municipal wastewater treatment plants in California's water-scarce climate, including an assumption of **no dilution** for down-the-drain pesticides products.

We appreciate the diligence of DPR's staff in implementing these model changes. BACWA looks forward to continued partnership between our Pesticides Committee and DPR to protect California's waterways, including efforts related to wastewater monitoring, modeling of surface water impacts, and implementation of the Sustainable Pest Management Roadmap.

If you have any questions, please contact BACWA's Project Managers:

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Respectfully Submitted,



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