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April 21, 2018

Steven Snyderman
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20460
Submitted via www.regulations.gov

Re: Docket ID EPA-HQ-OPP-2011-0920, Dinotefuran – Preliminary Ecological Risk Assessment

Dear Mr. Snyderman:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the preliminary ecological risk assessment (ERA) for dinotefuran (82 *Fed. Reg.* 60599). NACWA represents the interests of over 300 publicly owned wastewater treatment agencies, serving the majority of the sewered population in the U.S.

NACWA's members continue to face challenges as they strive to meet increasingly stringent Clean Water Act (CWA) requirements, while having limited control over the toxic pollutants and other substances in the wastewater they treat. These requirements include acute and chronic whole effluent toxicity (WET) tests that may be influenced by pesticides in the wastewater. Toxicity test failures can result in significant costs to utilities due to additional testing and evaluation requirements. Pesticides may also have impacts on receiving waters, recycled water quality, and the quality of biosolids for beneficial reuse.

Dinotefuran is a concern for NACWA's member utilities due to its potential for both acute and chronic adverse impacts to aquatic invertebrates and its pathways to the sewer systems. NACWA supports the detailed comments submitted by the Bay Area Clean Water Agencies (BACWA) and agrees with BACWA's request that EPA incorporate the latest dinotefuran toxicity data into the ERA.

Dinotefuran is used in many different pest control products that have pathways to the sewer system, including pet flea control (spot-on and spray products) and indoor treatment granules, aerosols, sprays, and foggers for cockroaches, bedbugs, fleas, and ants. The products may be transported directly to the sewer system when pets and treated

surfaces are washed and indirectly when the chemical is transferred to hands, clothing, and other surfaces that are subsequently washed. The comments submitted by BACWA provide information about recent research on these pathways for transport of pet flea control products to the sewer system.

BACWA's comments also provide information about the occurrence of pet flea treatment pesticides in the influent and effluent of publicly owned treatment works (POTWs). This research indicates that pet flea control products are a major source of these pesticides for POTWs, through both direct and indirect pathways. Due to its potential toxicity and pathways to the sewer system, NACWA requests that EPA conduct a "down the drain" risk assessment for dinotefuran, as it has done for other pesticides.

NACWA also requests that EPA consider risk mitigation for dinotefuran if warranted based on the "down the drain" assessment. NACWA suggests that EPA consider determining the minimum application rate necessary for indoor pest control and consider alternative application methods to minimize quantities discharged to POTWs. For example, sprays, foggers, and aerosols are likely to result in wide dispersal of dinotefuran and subsequent transport to the sewer system, while containerized gel baits are unlikely to reach the sewer system. Labels for pet flea control products should also include instructions to not wash pets for two weeks after treatment application.

Since pet flea control products such as pyrethroids, imidacloprid, indoxacarb, and fipronil are also undergoing registration review and may present risks to POTWs and the aquatic environment, NACWA recommends that EPA conduct a risk-benefit evaluation for pet flea control products as a group and consider all alternatives, including FDA-approved oral pet products. NACWA does not believe that fipronil, imidacloprid, indoxacarb, or pyrethroids are good alternatives to dinotefuran due to their potential for negative environmental impacts.

Thank you for your consideration of these comments. Please contact me at 202-533-1836 or cfinley@nacwa.org if you have any questions.

Sincerely,



Cynthia A. Finley, Ph.D.
Director, Regulatory Affairs