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January 3, 2017

Maria Piansay
Risk Management and Implementation
Pesticide Re-evaluation Division
Office of Pesticide Programs (OPP)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, DC 20460-0001
Submitted via *www.regulations.gov*

Re: Docket ID Number EPA-HQ-OPP-2016-0031, Flumethrin Preliminary
Work Plan, Case # 7456

Dear Ms. Piansay:

The National Association of Clean Water Agencies (NACWA) appreciates this opportunity to comment on the preliminary work plan for flumethrin, a pet flea control pesticide. NACWA represents the interests of nearly 300 publicly owned wastewater treatment agencies nationwide, 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. Pesticides may also pass through the treatment process and have impacts on receiving waters, recycled water quality, and the quality of biosolids for beneficial reuse.

Flumethrin and other pesticides used in pet flea collars and topical spot-on flea treatments are a concern for POTWs due to the large number of pets in the U.S. and the industry market data indicating that 75 percent of pet owners use a pet flea

control treatment.¹ Pet flea treatments can be discharged into the sewer system when pets are washed. A study of fipronil², a spot-on flea treatment, also showed that the chemical was transferred to indoor surfaces and to humans and their clothing. Subsequent washing of hands, clothing, and indoor surfaces results in the discharge of the pesticide into the sewer system. While this study used a different product, the pathway is likely to be similar for other flea treatment products. The comments submitted by the Bay Area Clean Water Agencies (BACWA) provide additional information about the research related to pet flea treatments and POTWs.

NACWA requests that EPA complete an ecological risk assessment for flumethrin and obtain the aquatic toxicity and environmental fate data necessary for a quantitative assessment. NACWA also requests that EPA evaluate the indoor uses of flumethrin in pet flea treatments and refine its “down-the-drain” module from the E-FAST model using the detailed recommendations contained in BACWA’s comments.

Thank you for your consideration of this request. 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

¹ Puro G. (2015) Packaged Facts: Pet Medications in the US, 4th Edition.

² Bigelow Dyk, M., et al. (2012) Fate and distribution of fipronil on companion animals and in their indoor residences following spot-on flea treatments, *Journal of Environmental Science and Health, Part B: Pesticides, Food Contaminants, and Agricultural Wastes*, 47(10): 913-924.