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November 18, 2016

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

Re: Docket EPA-HQ-OPP-2011-0666, Spinetoram Draft Risk Assessment, Case #7448

Dear Mr. Johnson:

The National Association of Clean Water Agencies (NACWA) appreciates this opportunity to comment on the draft risk assessment for spinetoram, 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 members have concerns about pesticides that are used by consumers and then washed or drained into the sewer system. Publicly owned treatment works (POTWs) are not specifically designed to treat pesticides, and some antimicrobials could potentially interfere with the biological processes used to treat wastewater, leading to permit violations and water quality impairments. Pesticides could also potentially pass through the treatment process and affect the receiving waters, the quality of recycled water, and the beneficial reuse of biosolids.

Spinetoram appears to be the first of many spot-on topical pesticides for companion animals that EPA is considering in its Registration Review Process. NACWA requests that EPA evaluate discharges into the sewer from spinetoram in the ecological risk assessment, and consider this pathway in all future registration review of pet spot-on treatments.

Spinetoram and other topical spot-on flea treatments are a concern, 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 A study of fipronil², another spot-on treatment, 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 spot-on product, the pathway is likely to be similar for other spot-on products. The comments submitted by the Bay Area Clean Water Agencies (BACWA) provide additional information about the research related to pet spot-on treatments and POTWs.

Spinetoram is persistent in aquatic ecosystems and highly toxic to aquatic invertebrates. EPA's ecological risk assessment for outdoor uses of spinetoram anticipates aquatic ecosystem concentrations to increase continually due to the pesticide's persistence. NACWA requests that EPA evaluate indoor uses of spinetoram in pet spot-on 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 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

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.