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July 24, 2017

Ricardo Jones

Office of Pesticide Programs (OPP)

U.S. Environmental Protection Agency (U.S. EPA)

1200 Pennsylvania Ave., NW.

Washington, DC 20460-0001

Submitted via *www.regulations.gov*

Re: EPA-HQ-OPP-2008-0844, Imidacloprid – Preliminary Aquatic Risk Assessment

Dear Mr. Jones:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the preliminary aquatic risk assessment for imidacloprid (82 FR 24113). NACWA represents the interests of nearly 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 the additional testing and evaluation requirements. Pesticides may also have impacts on receiving waters, recycled water quality, and the quality of biosolids for beneficial reuse.

Imidacloprid is a concern for NACWA's member utilities due to its high aquatic toxicity and ability to pass through the wastewater treatment processes used at publicly owned treatment works (POTWs), ending up in effluent and receiving waters. Imidacloprid is used in products that have pathways to the sewer system, including pet flea control products (such as spot-ons and collars) and indoor treatments for ants, roaches, and bedbugs. Imidacloprid may be transported directly to the sewer system when pets and treated surfaces are washed, and indirectly when

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the chemical is transferred to hands, clothing, and other surfaces that are subsequently washed. Imidacloprid is also introduced directly into the sewer system when it is used inside manholes and sewer lines.

The comments submitted by the Bay Area Clean Water Agencies (BACWA) provide detailed information about recent research on the occurrence of imidacloprid in the influent and effluent of POTWs. This research indicates that imidacloprid passes through POTWs and that effluent concentrations exceed the aquatic invertebrate chronic toxicity endpoints used in the preliminary aquatic risk assessment. Recent and ongoing research also indicates that pet flea control products are a major source of imidacloprid for POTWs, through both direct and indirect pathways.

NACWA requests that EPA expand the preliminary aquatic risk assessment to include indoor imidacloprid uses in a “down the drain” risk assessment, as well as direct use in manholes and sewer lines. NACWA also requests that EPA pursue risk mitigation for imidacloprid, which appears to be warranted based on published monitoring data. Since pet flea control products such as pyrethroids 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. Consideration should also be given to forbidding use of imidacloprid directly in the sewer system.

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