

March 15, 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-2011-0677, Pyriproxyfen – 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 pyriproxyfen (82 *Fed. Reg.* 59596, December 15, 2017). 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.

Pyriproxyfen is a concern for NACWA's member utilities due to its high aquatic toxicity. EPA requires the use of *Ceriodaphnia dubia* (*C. dubia*) as one of the test species to evaluate publicly owned treatment work (POTW) effluent toxicity. Although the ERA for pyriproxyfen provided toxicity data for *Daphnia magna*, it did not provide data for *C. dubia*. Since these invertebrates are known to have different sensitivities, the ERA may underestimate the risk of pyriproxyfen causing POTW toxicity test failures. NACWA requests that EPA obtain both acute and chronic toxicity data for *C. dubia* for inclusion in the ERA and ensure that any mitigation measures will prevent POTW effluent toxicity.

Pyriproxyfen is used in products, including pet flea control products, that have pathways to the sewer system. It 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 the Bay Area Clean Water Agencies (BACWA) provide detailed 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 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 high aquatic toxicity and pathways to the sewer system, NACWA requests that EPA conduct a "down the drain" risk assessment for pyriproxyfen, as it has done for other pesticides.

NACWA also requests that EPA consider risk mitigation for pyriproxyfen if warranted based on consideration of toxicity and a "down the drain" assessment. NACWA suggests that EPA consider determining the minimum application rate necessary for indoor flea control, which would minimize quantities discharged to POTWs. Product labels 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 pyriproxyfen 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,

A handwritten signature in black ink, reading "Cynthia A. Finley". The signature is written in a cursive, flowing style.

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