

**EXECUTIVE
COMMITTEE**

PRESIDENT

David St. Pierre

Executive Director
Metropolitan Water
Reclamation District of
Greater Chicago
Chicago, IL

VICE PRESIDENT

Mark S. Sanchez

Executive Director
Albuquerque-Bernalillo
County Water
Utility Authority
Albuquerque, NM

TREASURER

John P. Sullivan, Jr.

Chief Engineer
Boston Water &
Sewer Commission
Boston, MA

SECRETARY

Terry Leeds

Director
KC Water
Kansas City, MO

**CHIEF EXECUTIVE
OFFICER
Adam Krantz**

April 21, 2018

Thomas Harty
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-2011-0865, Thiamethoxam – Preliminary Aquatic and Non-Pollinator Terrestrial Risk Assessment

Dear Mr. Harty:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the preliminary aquatic and non-pollinator terrestrial risk assessment (RA) for thiamethoxam (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.

Thiamethoxam is a relatively new neonicotinoid pesticide that is not commonly measured by publicly owned treatment works (POTWs). The detailed comments submitted by the Bay Area Clean Water Agencies (BACWA) cite a monitoring study that did not find thiamethoxam in the influent or effluent at 13 POTWs. However, other neonicotinoids with similar uses have been detected in POTW influent and effluent, with little removal occurring during wastewater treatment processes. Increased use of thiamethoxam could result in the discharge of this insecticide through POTWs to the aquatic environment.

NACWA agrees with BACWA's request that EPA incorporate the most recent acute toxicity data on thiamethoxam into the RA and seek chronic toxicity data to fill the data gaps noted

April 21, 2018

Page 2 of 2

in the RA. NACWA also agrees with BACWA's request that EPA conduct a "down the drain" risk assessment for thiamethoxam, as it has done for other pesticides, since thiamethoxam may be transported to the sewer system when indoor surfaces treated for cockroaches, ants, or termites are washed.

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 that reads "Cynthia A. Finley". The signature is written in a cursive style with a large initial "C".

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