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January 29, 2019

Veronica Dutch
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-2009-1015, Amitraz – Preliminary Ecological Risk Assessment

Dear Ms. Dutch:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the preliminary ecological risk assessment (ERA) for amitraz (83 *Fed. Reg.* 61632). 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.

Amitraz is a concern for NACWA's member utilities due to its indoor uses and its pathways to sewer systems. NACWA supports the detailed comments submitted by the Bay Area Clean Water Agencies (BACWA) and agrees with BACWA's request that EPA conduct an expanded Preliminary ERA for amitraz that considers these pathways to the sewer system and incorporates the latest aquatic invertebrate toxicity data.

Amitraz is used in pet flea and tick collars, and as explained in the amitraz human health risk assessment, these collars release pesticides as either particles or liquid onto the pet's fur. The products may be transported directly to the sewer system when pets are washed and indirectly when the chemical is transferred to hands, clothing, and other surfaces that

are subsequently washed. The comments submitted by BACWA provide 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 publicly owned treatment works (POTWs). This research indicates that pet flea control products are a major source of these pesticides for POTWs, through both direct and indirect pathways.

The Preliminary ERA for amitraz was limited to evaluating the use of the pesticide in bee hives. NACWA requests that the ERA be expanded to evaluate sewer discharges from pet treatments and to include analysis of the latest available aquatic invertebrate toxicity data. NACWA also requests that EPA consider risk mitigation for indoor amitraz products by determining the minimum application rate – in this case, the collar material concentration – necessary for tick control to minimize quantities discharged to POTWs. Labels for pet flea control products should also include instructions to not wash pets with the collar on.

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.

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