January 29, 2019

Leigh Rimmer
Office of Pesticide Programs (OPP)
U.S. Environmental Protection Agency (U.S. EPA)
1200 Pennsylvania Ave., NW.
Washington, DC 20460–0001
Submitted via *Regulations.gov*

Re: EPA–HQ–OPP–2013-0140, Metam Sodium Draft Risk Assessment

Dear Ms. Rimmer:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the Draft Risk Assessment for the root control chemical metam sodium (83 *Fed. Reg.* 61632). NACWA represents the interests of over 300 of the nation's publicly owned wastewater treatment agencies, serving the majority of the sewered population. 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. In addition to the comments offered below, NACWA supports the more detailed comments and information submitted by the Bay Area Clean Water Agencies (BACWA).

NACWA is particularly interested in the Draft Risk Assessment for metam sodium given its use as a root control chemical in wastewater collection systems. Roots intruding into wastewater collection systems are a leading cause of blockages, which can cause untreated wastewater to spill out of the collection system. Controlling roots helps prevent these backups and protect water quality. Metam sodium is an effective root control chemical, but excess use of the chemical in a short time period may adversely affect wastewater effluent quality. In addition, unknowingly opening and entering collection system lines during metam sodium treatment could pose a hazard to collection system workers.

NACWA appreciates that current metam sodium labels include a requirement to notify downstream publicly owned treatment works (POTWs) about impending metam sodium applications. This will inform POTWs about the potential for metam sodium to interfere with biological wastewater treatment processes.

NACWA requests that EPA modify the label language to identify the safety risks to workers and to require at least 24 hours advance notice to the POTW before the start of metam sodium application, as will soon be required on other root control pesticide labels. NACWA agrees with the label language for metam sodium suggested by BACWA.

Wastewater collection system workers encounter unique occupational requirements, including entering and working in sanitary sewer lines and standing above manholes for prolonged periods to conduct maintenance and/or collect wastewater samples. Many of these tasks generally do not currently require extensive personal protective equipment, such as respirators. The current metam sodium labels do not have a minimum time for POTW notification before application, which could result in POTWs receiving only a few minutes notice before application. Workers already in the collection system could therefore be exposed to metam sodium and its rapidly formed degradate MITC, which both present health risks. A minimum 24-hour advance notice will provide POTWs with enough time to plan collection system work appropriately and protect worker safety.

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