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January 17, 2020

Tiffany Green
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-2013-0140, Metam Sodium and Metam
Potassium Registration Review**

Dear Ms. Green:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the Metam Sodium and Metam Potassium Registration Review – Proposed Interim Decision (84 *Fed. Reg.* 63650). 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.

NACWA is particularly interested in the registration review for metam sodium given its use as a root control chemical in wastewater collection systems. Roots intruding into 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 protects water quality. Metam sodium is an effective root control chemical, but excess use of the chemical in a short time period may adversely affect the quality of treated wastewater. In addition, unknowingly opening and entering collection system lines during metam sodium treatment could pose a safety hazard to collection system workers.

NACWA supports the updated label language in the Proposed Interim Decision that requires notification of publicly owned treatment works (POTWs) 24 hours prior to application to protect worker safety. EPA's proposed language, with the new language shown in bold, is as follows:

“Applicators must notify downstream waste water treatment facilities **at least 24 hours** prior to the start of metam sodium application so **they can protect worker safety by restricting staff from entering downstream collection system lines** and that they may monitor the operations of the wastewater treatment plant...”

This new language is vital to the safety of wastewater collection system workers. These 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 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,

A handwritten signature in black ink, reading "Cynthia A. Finley". The signature is fluid and cursive, with the first name "Cynthia" being the most prominent part.

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