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Adam Krantz

April 6, 2020

Cody Kendrick
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20460
Via www.regulations.gov

**Re: Docket ID EPA-HQ-OPP-2013-0586, Preliminary Registration Review
Work Plan for Methoprene**

Dear Mr. Kendrick:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the *Preliminary Registration Review Work Plan* for methoprene (85 *Fed. Reg.* 6155). This work plan also included two other pesticides – kinoprene and hydroprene – which are also addressed in these comments. NACWA represents the interests of over 300 publicly owned wastewater treatment agencies and stormwater management utilities, serving the majority of the sewered population in the US.

NACWA's members continue to face challenges as they strive to meet increasingly stringent Clean Water Act 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 wastewater from domestic and industrial sources. Toxicity test failures can result in significant costs to utilities due to additional testing and evaluation requirements. Pesticides may also have impacts on wastewater treatment processes, receiving waters, recycled water quality, and the quality of biosolids for beneficial reuse.

NACWA is particularly interested in methoprene, kinoprene, and hydroprene because of their use in pet flea products, which 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. Even publicly owned treatment works (POTWs) with advanced treatment technologies cannot completely remove pesticides. The comments submitted by the Bay Area Clean Water Agencies (BACWA) provide detailed information about recent research on the occurrence of pet flea control pesticides in the influent and effluent of POTWs, as well as the potential impacts of these pesticides on POTWs.

POTWs have no legal authority to regulate consumer products, and POTWs in most states are not allowed to regulate any pesticide use at the local level. Utilities therefore have no way to prevent the discharge of pesticides into the sewer system, and it is necessary for EPA to protect the wastewater treatment process and the aquatic environment by mitigating the risk presented by pesticides. To accomplish this, NACWA requests that EPA do the following for methoprene, kinoprene, and hydroprene:

- **Evaluate risks associated with indoor use.** Using its existing modeling tools, EPA should include a “down the drain” risk assessment for methoprene, kinoprene, and hydroprene, as it does for many other pesticides. EPA should specifically analyze pet spot-on treatments and other indoor treatments, such as use at animal care facilities and any other facility that is likely to discharge to an indoor drain connected to a municipal sewer system.
- **Reconsider the Endangered Species Act “no effects” determination.** Since POTW discharges may contain methoprene, kinoprene, and hydroprene, the conclusion that there is “no exposure” to endangered aquatic organisms may not be correct.
- **Consider risk mitigation measures for these pesticides.** Appropriate risk mitigation for methoprene, kinoprene, and hydroprene should include a determination of the minimum application rate necessary to achieve pet flea control, based on pet size. This would eliminate unnecessary overuse and minimize POTW discharge quantities. Product labels should discourage pet washing until at least two weeks after the last flea control treatment and should also include a graphic instruction to not dispose of the product down the drain.

NACWA also supports the more detailed comments submitted by BACWA. 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