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October 25, 2021

Tracy Perry
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20460
Submitted via www.regulations.gov

**RE: Draft Biological Evaluations for the Neonicotinoid Insecticides
Clothianidin, Imidacloprid, and Thiamethoxam (Docket ID No. EPA-HQ-
OW-2021-0575)**

Dear Ms. Perry:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the Draft Biological Evaluations for the Neonicotinoid Insecticides Clothianidin, Imidacloprid, and Thiamethoxam. NACWA represents the interests of over 300 publicly owned wastewater treatment agencies nationwide, serving the majority of the sewer population in the US.

NACWA is concerned about pesticides that may be washed or drained into the sewer system and then travel to publicly owned treatment works (POTWs). Pesticides may have the potential to interfere with the wastewater treatment processes used at POTWs, or they may pass through the POTW, ending up in the treated effluent and biosolids. Since even POTWs with advanced treatment technologies cannot remove all pesticides, receiving waters may be affected by pesticides in POTW effluent.

NACWA is disappointed that the Draft Biological Evaluations for neonicotinoids do not include the indoor sources of these pesticides, such as topically applied pet treatments ("spot-ons" and sprays). These treatments are transferred to hands, clothing, and household surfaces, which are subsequently washed and transported into the sewer system. The Bay Area Clean Water Agencies (BACWA) has submitted studies that highlight the concentrations of neonicotinoids in municipal wastewater effluent.

The presence of pesticides in municipal wastewater effluent can adversely impact POTWs, which continue to face challenges as they strive to meet increasingly stringent Clean Water Act requirements. 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 the additional testing and evaluation requirements.

In addition, utilities across the country are expanding their efforts to recover the resources available in wastewater. Since water reuse and the beneficial reuse of biosolids may be adversely affected by pesticides, it is becoming more important to protect the quality of the wastewater that enters POTWs. POTWs in most states are not allowed to regulate pesticide use at the local level, so there is no way for utilities to prevent the discharge of pesticides into wastewater. It is therefore necessary for EPA to protect the wastewater treatment process, the recovery of resources from wastewater, and the aquatic environment by evaluating and mitigating the risk presented by pesticides.

NACWA asks that EPA evaluate the impacts of neonicotinoids in topically applied pet treatments on municipal wastewater treatment and resource recovery. To minimize the quantities of neonicotinoids discharged to POTWs, EPA should develop a program to eliminate the unnecessary use of these pesticides in pet treatments.

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, flowing style.

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