



#### EXECUTIVE COMMITTEE

##### PRESIDENT

**Kishia L. Powell**

*Chief Operating Officer and  
Executive Vice President  
DC Water  
Washington, DC*

##### VICE PRESIDENT

**Thomas W. Sigmund**

*Executive Director  
NEW Water  
Green Bay, WI*

##### TREASURER

**Oluwole A. McFoy**

*General Manager  
Buffalo Sewer Authority  
Buffalo, NY*

##### SECRETARY

**Diane Taniguchi-Dennis**

*Chief Executive Officer  
Clean Water Services  
Hillsboro, OR*

##### PAST PRESIDENT

**Terry Leeds**

*Director  
KC Water  
Kansas City, MO*

##### CHIEF EXECUTIVE OFFICER

**Adam Krantz**

1130 Connecticut Ave NW  
Suite 1050  
Washington DC 20036

T (202) 833-2672

F (888) 267-9505

[www.nacwa.org](http://www.nacwa.org)

October 27, 2021

Jordan Page  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave, NW  
Washington, DC 20460  
Submitted via [www.regulations.gov](http://www.regulations.gov)

**RE: Pyrethrins Registration Review – Proposed Interim Decision (Docket ID No. EPA-HQ-OPP-2011-0885)**

Dear Mr. Jordan:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the Pyrethrins Registration Review – Proposed Interim Decision. NACWA represents the interests of over 340 publicly owned wastewater treatment and stormwater management agencies nationwide, serving the majority of the sewered 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) or be washed into municipal separate storm sewer systems (MS4s). 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.

Pyrethrin products that are used in the indoor environment include carpet sprays, home foggers, home lice sprays, and bedbug products. There are also over 90 registered pet flea, tick, and ear mite products containing pyrethrins. All of these products may be subsequently washed off of their treatment area and transported into the sewer or stormwater system. NACWA appreciates that the pyrethrins Proposed Interim Decision acknowledges that these uses can result in risks to aquatic organisms.

NACWA supports EPA's proposed mitigations to limit the outdoor uses of pyrethrins in urban settings, to reduce run-off of these products into MS4s and to surface waters, and to limit disposal of these products down the

October 27, 2021

Page 2 of 2

drain. NACWA agrees that the labels should specify “indoor use only” or “outdoor use only,” along with the label language stating that products should not be disposed of in indoor or outdoor drains and the logo that shows this visually.

NACWA supports EPA’s statement that the Agency is “considering additional measures that could enhance its oversight of pet products, such as additional targeted studies and monitoring...” The pathway of indoor pesticide use, including with pet products, is essential to understanding the impacts of pesticides such as pyrethrins.

Thank you for your consideration of these comments. Please contact me at 202-533-1836 or [cfinley@nacwa.org](mailto:cfinley@nacwa.org) if you have any questions.

Sincerely,

A handwritten signature in black ink, reading "Cynthia A. Finley". The signature is written in a cursive style with a large, stylized initial "C".

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