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June 5, 2025

Charles Smith
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20460
Submitted via www.regulations.gov

RE: Memorandum Supporting Proposed Decision to Approve Registration for the New Active Ingredient of Isocycloseram (Docket ID No. EPA-HQ-OPP-2021-0641)

Dear Mr. Smith:

The National Association of Clean Water Agencies (NACWA) appreciates this opportunity to comment on EPA's memorandum supporting the proposed decision to approve registration for the new active ingredient isocycloseram, along with its supporting documents, including the *Draft Environmental Fate and Ecological Risk Assessment for the Proposed FIFRA Section 3 Registration* ("draft ERA") and the *Biological Evaluation with Associated Effects Determinations for Federally Listed Endangered and Threatened Species and Designated Critical Habitat* ("draft BE").

NACWA represents the interests of over 360 public wastewater and stormwater agencies of all sizes across the country. Each day, these clean water utilities provide the essential service of protecting public health and the environment by managing and treating billions of gallons of our nation's wastewater and stormwater, as well as the biosolids produced from the wastewater treatment process.

NACWA's public agency 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 and stormwater they treat and manage. Pesticides are introduced to public wastewater and stormwater systems through both interior and exterior applications, when they are washed off surfaces, textiles, and pets, or applied directly to sewer lines for root control. Since municipal wastewater treatment facilities, or publicly owned treatment works (POTWs) are not designed specifically to remove pesticides, pesticides may potentially pass through the treatment process or interfere with the biological processes used to treat

wastewater. Pesticides may also affect receiving waters, recycled water quality, and the quality of biosolids for beneficial reuse.

Isocycloseram is a broad-spectrum contact insecticide to be used as a gel, spray, spot, void, or crack-and-crevice treatment for cockroaches, bed bugs, ants, and termites. Its proposed uses may cause it to enter the sewer system: using isocycloseram in interior floor drains and outdoor drains will lead directly to sewer discharge, while indoor treatments on surfaces will result in the pesticide washing off surfaces or hands into the sewer system.

Isocycloseram appears to be more toxic than existing pesticides for the same uses. In the draft ERA, EPA found that isocycloseram is very highly toxic to aquatic invertebrates and toxic to fish. When comparing aquatic invertebrate toxicity values, isocycloseram is orders of magnitude more toxic than fipronil and imidacloprid, pesticides with many of the same indoor uses. The environmental degradation rates listed in Table 5-2 of the draft ERA suggest that isocycloseram and its degradates could persist through the wastewater collection and treatment process, which can be shorter than one day. In addition, several of the isocycloseram degradates are also highly toxic to aquatic invertebrates, with toxicity values similar to fipronil.

Urban water bodies in California and elsewhere are already impacted by fipronil, imidacloprid, and numerous pyrethroids, with monitoring data showing that these pesticides exceed toxicity benchmarks, as well as Clean Water Act 303(d) listings leading to total maximum daily loads (TMDLs). These monitoring data include pesticides with mitigation measures – high dilution ratios for mixing the product prior to application, labeling, and use restrictions – that are similar to those of the proposed isocycloseram labels. This indicates that the mitigation measures alone may not be sufficient to prevent improper use. NACWA therefore urges EPA to take the actions described below for isocycloseram, along with the more detailed requests from the Bay Area Clean Water Agencies (BACWA).

Model indoor and in-sewer uses to ensure that uses affecting POTWs are addressed. In the Draft ERA, EPA did not model indoor uses of isocycloseram, including cockroach products applied directly to floor drains connected to sewers, washable fabrics treated for bedbugs, and cockroach and ant sprays used in kitchen areas that will be washed down the drain with mopping. Additionally, EPA did not consider indoor uses in its draft BE. Based on the very limited public data for this new pesticide, the isocycloseram discharges from cumulative residential and commercial uses of these products alone could cause isocycloseram to pass through municipal wastewater treatment plants at high enough concentrations to be a toxicity concern to aquatic life. NACWA asks EPA to model these indoor uses of isocycloseram and to consider toxic degradates along with the parent compound. EPA should then use the modeling results to develop mitigation measures that will protect POTWs and their receiving waters.

Remove use in sewers from all proposed pesticide labels. The use of isocycloseram directly in and around drains provides a direct pathway to the sewer system and municipal wastewater treatment plant. EPA should therefore remove the use of isocycloseram from all proposed labels, including the proposed A22128 Cockroach Gel Bait label. In addition, EPA should include the text, “DO NOT apply inside sewers or sewer drains,” in Section 5.1 Use Restrictions.

Include the drain discharge prohibition language and graphic used for pyrethroid products. NACWA asks that a simple graphic be used on product packages to show that the product should not be poured down the drain. NACWA recommends that a clear graphic be used, such as this one provided by the Dublin San Ramon Sanitary District, which EPA adopted for pyrethroid products:



Along with the graphic, NACWA asks EPA to include drain discharge prohibition label language in both English and Spanish, and recommends the following language for products labeled for use directly inside pipes or sinks:

“Do not pour down the drain or sewer. Call your local solid waste agency for local disposal options.”

Prohibit the use of isocycloseram on washable fabrics or textiles. The proposed isocycloseram label allows its use on fabrics or textiles, but the pesticide will be discharged to the sewer system when these fabrics and textiles are washed. NACWA asks EPA to include language in the proposed label for A21550 400SC Insecticide to make it clear that users should not apply the pesticide to any fabrics or textiles that could be washed.

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".

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