

**Pesticide:** Metam Sodium; EPA-HQ-OPP-2013-0140  
**Use:** Root control product.  
**Why we care:** Metam sodium (in sewer root control foams) and its degradate MITC are safety hazards to workers inadvertently entering lines undergoing treatment, can cause treatment process interference, and has historically contained trace nitrosodimethylamine (NDMA), a suspected human carcinogen.  
**Actions taken:** BACWA has tracked this pesticide since the Work Plan was released in 2014.  
**Status:** EPA released the Proposed Interim Decision in November 2019.

**Next steps:** EPA will analyze comments and issue a Final Interim Decision.  
**Recommendation:** Submit comments thanking EPA for incorporating BACWA’s suggested label changes.

BACWA Comments to EPA	EPA Response	Did EPA incorporate BACWA’s comment?
<p>BACWA requested that EPA update pesticide labels to require that applicators notice downstream wastewater treatment plants (WWTPs) at least 24 hours prior to application of metam in sewers and to clarify and educate applicators that this notice is important to protect worker safety (requested label language additions in bold):</p> <p>...“Applicators must notify downstream waste water treatment facilities <b>at least 24 hours</b> prior to the start of metam sodium applications so <b>they can protect worker safety by restricting staff from entering downstream collection system lines</b> and that they may monitor the operations of the wastewater treatment plant. Applicators must report how much product will be applied to the sewage system to operators of downstream water treatment plants and inform these operators that high concentrations of these chemicals in wastewater may adversely affect the biological sewage breakdown process in wastewater treatment plants.”</p>	<p>EPA proposes to use BACWA’s label language. (p.28)</p>	<p><b>YES</b></p>