



November 3, 2021

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Office of Pesticide Programs (OPP)  
c/o Regulatory Public Docket Center (28221T),  
U.S. Environmental Protection Agency (EPA)  
1200 Pennsylvania Ave. NW  
Washington, DC 20460-0001

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

Dear Jordan Page:

On behalf of the Bay Area Clean Water Agencies (BACWA), we thank you for the opportunity to comment on the Pyrethrins Registration Review – Proposed Interim Decision (PID), which covers products used in pools, spas, and hot tubs. BACWA’s members include 55 publicly owned wastewater treatment facilities and collection system agencies serving 7.1 million San Francisco Bay Area residents. We take our responsibilities for safeguarding receiving waters seriously.

There are numerous pyrethrins products that are used in the indoor environment including carpet sprays, home sprays, home foggers, home lice sprays, and bedbug products. In addition, there are over ninety pyrethrins on-pet flea/tick/ear mite products registered in the United States. These include pet dips, shampoos, spot-treatments, and sprays.

The pyrethrins PID acknowledges that these uses result in risks of concern for aquatic organisms [PID, p. 30]. This letter is in support of EPA’s proposed mitigations that are intended to reduce outdoor uses of pyrethrins in urban settings [PID, pp. 36-48], which are in turn expected to result in reduced risks of exposure to non-target aquatic organisms in downstream surface waters.

**BACWA Supports Mitigations Outlined in EPA’s Pyrethrins PID**

BACWA supports the mitigations outlined in the pyrethrins PID [PID, pp. 36-48] including:

- Rectification of pyrethrins and synthetic pyrethroid label language to provide more consistency between labels.
- Labels noting “indoor use only” or “outdoor use only.”
- Addition of label language noting “Do not pour or dispose down the drain or sewer. Call your local solid waste agency for local disposal options.” And “Do not allow to enter indoor or outdoor drains.”
- Label language in both English and Spanish.

- Visual graphic indicating that pyrethrins products should not be dumped down the drain, along with requirements for minimum size of pictogram. BACWA appreciates that EPA selected the pictogram that we put forward from our member agency, Dublin San Ramon Sanitary District.



BACWA supports that “EPA is considering additional measures that could enhance its oversight of pet products, such as additional targeted studies and monitoring...” [PID, pp. 32] As we have mentioned in previous comment letters, indoor pathways of pesticides, including down-the-drain analysis, is essential to understanding the true impacts of pesticides such as pyrethrins.

Because pyrethroid pesticides are far more troublesome from an aquatic toxicity perspective, we are encouraged by EPA’s decision to provide these substantial and consistent mitigations for both pyrethrins and pyrethroids. We look forward to seeing this language in the Registration Review Final Decision.

Thank you for your consideration of our comments. If you have any questions, please contact BACWA’s Project Managers:

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Respectfully Submitted,

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