



California Stormwater Quality Association

"Dedicated to the Advancement of Stormwater Quality Management, Science and Regulation"

October 18, 2004

Public Information and Records Integrity Branch (PIRIB) (7502C)
Office of Pesticide Programs (OPP)
Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, DC 20460-0001

Mark Seaton
Special Review and Reregistration Division
Office of Pesticide Programs
Environmental Protection Agency, Mail Code 7508C
1200 Pennsylvania Avenue, NW.
Washington, DC 20460-0001

Subject: Revised Risk Assessment for Metam Sodium (Docket No. OPP-2004-0159)

Dear PIRIB and Mr. Seaton:

Thank you for this opportunity to comment on the Revised Risk Assessment for Metam Sodium. CASQA previously provided these same comments in an August 2, 2004 letter regarding the Preliminary Risk Assessment. It is our understanding that the compressed comment and review periods for this pesticide precluded your agency from preparing a response to comments on the Preliminary Risk Assessment before releasing the Revised Risk Assessment, so we are resubmitting our comments to place them into the record for the Revised Risk Assessment.

The California Stormwater Quality Association (CASQA) is composed of stormwater quality management organizations and individuals, including cities, counties, special districts, industries, and consulting firms throughout the state, and was formed in 1989 to recommend approaches to the State Water Resources Control Board (State Board) for stormwater quality management in California. In this capacity, we have assisted and continue to assist the State Board with the development and implementation of stormwater permitting processes. The main issue for CASQA regarding metam sodium is its label language.

Product Labels Should Clearly Prohibit Use in Storm Drains

Metam sodium is acutely toxic to aquatic life. Therefore, CASQA requests that U.S. EPA clarify its label language to ensure that the unfortunate consequences of a storm drain misapplication are avoided. While we understand that it is U.S. EPA's intent to avoid use of metam sodium in storm drain lines, the currently required label language is not clear in this regard. The label

language also has a confusing reference to "potable sewer systems." Clarifying the language will reduce the potential for confusion between sanitary sewer systems and separate storm drains, thus preventing inadvertent applications to storm drains that would be potentially harmful to the environment.

CASQA recommends eliminating all references to "potable sewer systems" from the label and adding, "Do not use this product in a separate storm drain system." to the label. U.S. EPA made a similar clarifying change to a label in response to a similar request regarding the use of chlorpyrifos on manhole covers¹ made by CASQA, when it was known as the Stormwater Quality Task Force (SWQTF).

Again, thank you for the opportunity to submit these comments on Revised Risk Assessment for Metam Sodium. Please contact me at (530) 753-6400, x 232 if you have any questions regarding this comment.

Sincerely,



Karen Ashby - Chair
California Stormwater Quality Association

cc: CASQA Executive Board and Executive Program Committee

¹ Request to Specifically Prohibit Use of Chlorpyrifos in "Storm Drain Systems" or "Separate Storm Sewer Systems" Under the Continuing Site of Use Referred to as "Manhole Covers" by USEPA (Docket # OPP-34203F) (SWQTF letter to PIRIB and Mr. Tom Meyers, July 25, 2001)