

Sanitation Districts of Los Angeles County  
1955 Workman Mill Road  
Whittier, CA 90601  
(562) 699-7411  
www.lacsd.org

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Public Information and Records Integrity Branch (PIRB)  
Office of Pesticide Programs (OPP)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 40460-001

Attn: Docket ID No. OPP-2004-0159

**Docket ID Number OPP-2004-0159- Metam-Sodium Revised Risk Assessments**

The purpose of this letter is to comment on EPA's Revised Risk Assessments for metam-sodium, which were made available for public comment on August 31, 2004 (69 FR 53058). The County Sanitation Districts of Los Angeles County (Districts) previously submitted comments on an earlier version of the risk assessments.<sup>1</sup> In these comments, the Districts expressed concerns that the risk assessments did not adequately consider impacts of metam-sodium as applied directly to sewers and that the risk assessments neglected potential adverse water quality impacts from the presence of n-nitrosodimethylamine (NDMA) in metam-sodium.

The second of these two concerns, relating to NDMA contamination in metam-sodium, was briefly addressed by EPA in the Revised Risk Assessments.<sup>2</sup> The Districts appreciate EPA's commitment to work with the Office of Water to investigate this matter in more detail. We would like to request that the investigation proceed in a timely manner, so that potential contamination of water resources with NDMA can be addressed in future metam-sodium risk assessments. Additionally, in its response to the Districts' comments, EPA implied that only metam-sodium applied to sewers is potentially contaminated with NDMA. We would like to restate our previous comment that metam-sodium used in non-sewer applications could also contain NDMA and thus have potentially significant adverse water quality impacts during use.

Furthermore, the Revised Risk Assessments did not address the Districts' concerns relating to potential adverse human health effects from application of metam-sodium root killing products to sewers, nor did they address the Districts' concerns regarding potential adverse impacts on downstream wastewater treatment plants from this application. We are therefore resubmitting our original comments on these subjects, and request that EPA consider these comments.

**Background**

The Districts are a confederation of 25 independent special districts that serve the water pollution control and solid waste management needs of over five million people in Los Angeles County, California.

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<sup>1</sup> Martyn, P. 2004. 7/27/04 Letter to Metam-Sodium Docket. County Sanitation Districts of Los Angeles County

<sup>2</sup> U.S. EPA. 2004. Environmental Fate and Ecological Risk Assessment for the Existing Uses of Metam-Sodium (August 2004). p. 11.

Fifteen of the districts have collectively constructed an extensive regional sewerage system known as the Joint Outfall System (JOS), which conveys and treats approximately 450 million gallons per day (MGD) of wastewater from 72 cities and unincorporated county areas. The JOS consists of seven treatment/water reclamation plants (WRPs) and 1,200 miles of trunk sewers that form a network connecting the treatment plants and ocean outfalls off White Point on the Palos Verdes Peninsula. The Districts also operate four WRPs in northern Los Angeles County serving the communities in and around the cities of Santa Clarita, Lancaster, and Palmdale. On an annual basis, over 50 MGD of reclaimed water is reused for applications including groundwater recharge, landscape irrigation and industrial uses. The remainder is discharged to inland surface waters. The designated beneficial uses of the receiving waters to which the Districts' WRPs discharge are diverse and vary depending on location. These existing and potential use designations include groundwater recharge, water recreation, warm fresh water habitat, wildlife habitat, commercial and sport fishing, and rare, threatened or endangered species spawning, reproduction, and early development. Wastewater solids removed during treatment are digested and dewatered. The resulting biosolids are either landfilled or beneficially reused for agricultural land application.

### **Risks Associated With Sewer System Applications**

In addition to various agricultural uses, metam-sodium is registered for use as a root-killing agent in sanitary sewer systems. The risks associated with use of metam-sodium to kill roots in sanitary sewers were not explored in EPA's risk assessments. Although the amount of active ingredient used in sewer root killing applications is small compared to the amount used for agricultural purposes, direct application of metam-sodium to sewers poses unique risks that need to be considered.

One risk associated with the application of metam-sodium to sewers is the risk that vapors from its degradation product, methyl isothiocyanate (MITC), may reach buildings and basements on treated sewer lines. The label for one metam-sodium root killer, Sanafoam Vaporooter II, states "Consideration must be given to all sewer service lines and building elevations and basements for the possibility of foam coming up out of drains. Consideration must be given to distance between houses and sewers to be treated, depth of sewers compared to drains in buildings, line obstructions, broken and empty traps. Drains which may be subject to backup and flooding must be plugged.... Building occupants should exit structures if the rotten egg or sulfur-like odor of metam-sodium is detected. Open windows and ventilate with fans." While this language does offer some suggestions for minimizing risks to residents during application of metam-sodium root killers, it does not ensure that there will be no exposure of residents. Such exposure could be significant, and should be considered by EPA in its risk assessments. Additionally, this language recommends that affected building occupants evacuate a structure if metam-sodium odors are encountered during sewer treatment. However, it does not state how this advice will be communicated to occupants on sewer lines being treated. Typically residents and other building occupants on sewer lines being treated with metam-sodium are not been notified prior to application. Thus, they would be unaware of the need to evacuate a structure if sulfur-like odors were encountered.

Additionally, metam-sodium root killers could have adverse impacts on the operation of wastewater treatment plants downstream of the sewers being treated. The label for Sanafoam Vaporooter II does include a maximum usage rate in sewers of 15 gallons of Sanafoam Vaporooter II Liquid Concentrate for each million gallon per day (MGD) of sewerage flow into a wastewater treatment plant. The risk assessments should include a discussion of potential adverse impacts to downstream wastewater treatment plants, along with supporting calculations to show that the recommended maximum application rate is safe for wastewater treatment plants.

Since wastewater treatment plants differ and some may be more sensitive than others, we recommend that the label instructions require notification of the downstream wastewater treatment plant prior to application. Currently labeling states, "Inform appropriate wastewater treatment plant officials prior to use so they may check for any unusual rotten egg or sulfur-like odor of metam-sodium above that

of sewage and monitor the performance of filter beds or digesters.” The Districts are not currently receiving notification of all uses of metam-sodium upstream of our wastewater treatment plants, so this language clearly needs to be strengthened. Suggested language is, “Downstream wastewater treatment officials must be informed prior to every application, regardless of size, so that potential impacts on the receiving wastewater treatment plant can be monitored. Potential impacts include unusual rotten egg or sulfur-like odors of metam-sodium above that of sewage, reduction in performance of biological treatment processes, and increased effluent concentrations of n-nitrosodimethylamine (a contaminant in metam-sodium).”

### Contact Information

The Districts appreciate your consideration of our comments. If you have any questions about this letter or require additional information, please contact Ann Heil of the Sanitation Districts’ Industrial Waste Section by phone at 562/699-7411, extension 2950, or by e-mail at [aheil@lacsdsd.org](mailto:aheil@lacsdsd.org).

Very truly yours,

James F. Stahl

Paul C. Martyn  
Head, Industrial Waste Section

Susan Hazen  
Office of Prevention, Pesticides and Toxic  
Substances (OPPTS)  
U.S. EPA Headquarters 7101M  
1200 Pennsylvania Avenue N.W.  
Washington, DC 20460

Mark Seaton  
Special Review and Reregistration Division  
U.S. EPA Headquarters 7508C  
Office of Pesticide Programs  
1200 Pennsylvania Avenue N.W.  
Washington, DC 20460

Jim Jones, Director  
Office of Pesticide Programs  
U.S. EPA Headquarters 7501C  
1200 Pennsylvania Avenue N.W.  
Washington, DC 20460

Wayne Nastri, Administrator, Region IX  
U.S. EPA Region IX, ORA-1  
75 Hawthorne Street  
San Francisco, CA 94105

Raymond Chavira  
U.S. EPA Region IX, CMD-5  
75 Hawthorne Street  
San Francisco, CA 94105

John Bishop, Executive Officer  
California Regional Water Quality Control  
Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013