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Public Information and Records Integrity Branch (PIRB) (7502C)  
Office of Pesticide Programs (OPP)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460  
Attn: Docket ID Number OPP-2005-0040

Submitted via electronic mail

To Whom It May Concern:

**Docket No. OPP-2005-0040- MGK 264 Risk Assessments**

The purpose of this letter is to comment on EPA's risk assessments for MGK 264, which were made available for public comment on April 27, 2005 (70 FR 21758). MGK 264 is a synergist that increases the efficacy of other pesticides, most notably pyrethrins and pyrethroids. Tri-TAC is concerned that the risk assessments do not evaluate the potential adverse water quality impacts associated with sewer discharges of MGK 264, particularly MGK 264 used in pet shampoos and other indoor-use products. We are also concerned that the risk assessments for MGK 264 only considered MGK 264 alone, and not MGK 264 in conjunction with the pesticides that it synergizes. As background, Tri-TAC is a technical advisory group for Publicly Owned Treatment Works (POTWs) in California. It is jointly sponsored by the California Association of Sanitation Agencies, the California Water Environment Association, and the League of California Cities. The constituency base for Tri-TAC collects, treats, and reclaims more than two billion gallons of wastewater each day and serves most of the sewered population of California.

**Comments**

While the EPA risk assessments for MGK 264 consider potential adverse water quality impacts arising from mosquito abatement uses and uses on lawns and ornamental plants, they do not consider such impacts from usage of MGK 264 in pet shampoos and other indoor use products. There are some 24 pet shampoos registered for use in California that contain MGK 264. Note that normal usage of pet shampoos includes a direct pathway to sewers, from rinsing of the shampoo after application.

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Even when pets are rinsed outdoors, the rinse water can enter storm drains or flow directly to creeks and rivers.

Additionally, EPA indicates that MGK 264 is persistent environmentally, and that it has a potential for bioaccumulation in aquatic organisms.<sup>1</sup> Because MGK 264 is persistent in the environment, it may not be well removed by wastewater treatment plants. Some of the MGK 264 discharged to sewers may pass through treatment plants into receiving water bodies. POTWs could be impacted if discharges of MGK 264 lead to water quality impacts such as downstream aquatic toxicity, either from MGK 264 alone or from MGK 264 acting in conjunction with other pesticides. Tri-TAC therefore requests that EPA evaluate potential adverse water quality impacts from sewer discharges of MGK 264.

### **Contact Information**

The Districts appreciate this opportunity to comment on the risk assessments for MGK 264. If you have any questions about this letter or require additional information, please contact Ann Heil by phone at 562/699-7411, extension 2950, or by e-mail at [aheil@lacs.org](mailto:aheil@lacs.org).

Sincerely,



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cc:Toby Jones, Asst. Director, Div. of Registration & Health Evaluation,  
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<sup>1</sup> EPA, Overview of the MGK 264 Risk Assessments, May 3, 2005.