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December 13, 2006

Mr. John Sanders
Department of Pesticide Regulations
Chief, Environmental Monitoring Branch
1001 I Street
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Follow Up to November 9, 2006 Tri-TAC Meeting

Dear Mr. Sanders:

Tri-TAC would like to thank you for attending our November 9, 2006 meeting. The discussion regarding the pyrethroids reevaluation was very informative and we look forward to working with you in the future. Tri-TAC would also like to thank you for the opportunity to review the draft protocol and report for pyrethroid uses that discharge to the sewer system. We look forward to reviewing these documents and providing technical comments.

As discussed in the meeting, in order to scientifically evaluate the impacts to aquatic organisms from the discharge of pyrethroids into wastewater collection systems it is important to have a mass balance for each wastewater treatment plant sampled during the reevaluation. The mass balance will provide information regarding the fate of pyrethroids during wastewater treatment and estimate the amount of pesticide reduced through treatment processes. In addition, by conducting a thorough evaluation of pyrethroid fate in wastewater treatment systems valuable information will be generated that could be useful for the future evaluation of other pesticides.

For a wastewater treatment plant, collecting and analyzing the influent, effluent, and biosolids will create a mass balance. The amount removed during treatment can then be estimated by the amount of pesticide in the influent minus the amount of pesticide in the effluent and biosolids. Since the majority of biosolids are reused, typically by land application, only sampling wastewater treatment effluent ignores a second potential pathway for pyrethroids to reach surface waters. For a complete assessment of the impacts to aquatic organisms, the influent, effluent, and biosolids at a representative number of facilities utilizing different treatment processes, flow rates, and pesticide use patterns should be analyzed during the reevaluation.

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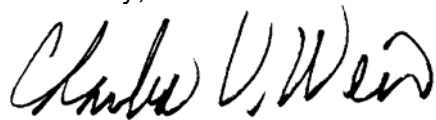
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The pyrethroids reevaluation is very important to Tri-TAC and we would like to be kept informed on the progress of the project. Tri-TAC will meet again in Sacramento on March 8, 2007. If you are available, we would like for you to attend the meeting and provide a brief update on the pyrethroid reevaluation.

We look forward to hearing from you and the registrants regarding any further assistance we can provide. Please feel free to contact either Ben Horenstein at (510) 287-1846 or bhorenst@ebmud.com, or Preeti Ghuman at pghuman@lacsdsd.org or (562) 699-7411, extension 2904 for further information.

Sincerely,



Charles V. Weir
Chair, Tri-TAC

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