



Ben Horenstein
Tri-TAC Chair
East Bay Municipal Utility District
375 – 11th Street, MS702
Oakland, CA 94607
(510) 287-1846
bhorenst@ebmud.com

January 13, 2010

Mr. Charles M. Andrews
Associate Director
Pesticide Programs Division
California Department of Pesticide Regulation
1001 I Street
Sacramento, CA 95814

RE: Pyrethroid Reevaluation – Future Steps for Wastewater Studies

Dear Mr. Andrews,

Tri-TAC is a technical advisory committee representing the League of California Cities, California Association of Sanitation Agencies, and California Water Environment Association. We seek to improve the effectiveness and accountability of environmental programs that affect municipal wastewater treatment plants (also known as “publicly owned treatment works” or “POTWs”) in California by working with regulatory agencies and interest groups on treatment plant-related issues. Tri-TAC appreciates that DPR has sought to involve stakeholders, including ourselves, in the reevaluation of pyrethroid insecticides that DPR initiated in 2006.

Recent research by Dr. Don Weston and colleagues has linked the presence of pyrethroid insecticides to the toxicity of undiluted municipal wastewater treatment plant effluent to a standard test organism. (The authors’ summary of this research is enclosed.) Dr. Weston’s findings have increased the urgency of the pyrethroid reevaluation for Tri-TAC members.

In light of this new information, Tri-TAC would like to meet with you, John Sanders, and State Water Resources Control Board representatives to discuss the next steps for the pyrethroid reevaluation. Tri-TAC proposes that this meeting take place in Sacramento in February 2010. At the meeting, Tri-TAC would like to discuss the goals of the wastewater pyrethroid reevaluation, data gaps that exist in light of recent research findings, and actions that should be taken to ensure that the reevaluation proceeds in a timely and productive manner. Tri-TAC would specifically like to discuss potential adjustments for the wastewater portion of the pyrethroid reevaluation in light of Dr. Weston’s recent findings. We would also like to discuss the stakeholder involvement process for the wastewater portion of the pyrethroid reevaluation.

While Tri-TAC sees a need for a meeting to discuss the course of the pyrethroid reevaluation, we do not wish to delay work in progress on development of a study protocol and analytical methods for POTW monitoring.

Vice Chair

Natalie Sierra
San Francisco Public
Utilities Commission
1145 Market Street, 5th Floor
San Francisco, CA 94103
(415) 934-5772
nsierra@sfgwater.org

Water Committee

Co-Chairs
Gail Chesler
Central Contra Costa
Sanitation District
5019 Imhoff Place
Martinez, CA 94553
(925) 229-7294
gchesler@ccentralsan.org

Lorien Fono

Carollo Engineers
2700 Ygnacio Valley Road,
Suite 300
Walnut Creek, CA 94598
(925) 932-1710
lfono@carollo.com

Air Committee

Co-Chairs
Jim Sandoval
CH2M Hill
1737 North First Street,
Suite 300
San Jose, CA 95112-4524
(510) 610-9301
jim.sandoval@ch2m.com

Jay Witherspoon

CH2M Hill
155 Grand Avenue,
Suite 1000
Oakland, CA 94612
(510) 251-2888
jay.witherspoon@ch2m.com

Land Committee

Co-Chairs
Greg Baatrup
Fairfield-Suisun Sewer
District
1010 Chadbourne Road
Fairfield, CA 94534
(707) 428-9162
gbaatrup@fssd.com

Matt Bao

Los Angeles County
Sanitation Districts
1955 Workman Mill Road
Whittier, CA 90601
(562) 699-7411 ext. 2809
mbao@lacsds.org

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Thank you for your consideration of Tri-TAC's input into the pyrethroid reevaluation. Please contact Ms. Preeti Ghuman at (562) 908-4288, extension 2904, or pghuman@lacsdsd.org with any questions and to make arrangements for the meeting with Tri-TAC representatives.

Sincerely,



Ben Horenstein
Chair

BKH:PG:llb

Enclosure: Pyrethroid Pesticides in the Sacramento-San Joaquin Delta: Sources and impacts on Delta waters (Summary of research results prepared by D. Weston & M. Lydy)

cc: Christopher Reardon, California Department of Pesticide Regulation
John Sanders, California Department of Pesticide Regulation
Nan Singhasemanon, California Department of Pesticide Regulation
Denise Alder, California Department of Pesticide Regulation
James Giannopoulos, California State Water Resources Control Board
Syed Ali, California State Water Resources Control Board
Tom Mumley, San Francisco Bay Regional Water Quality Control Board
Kelly Moran, UP3 Project
Geoff Brosseau, CASQA