



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

November 22, 2010

Office of Pesticide Programs (OPP)
Regulatory Public Docket (7502P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001

Attention: Ms. Yan Donovan

Docket No. EPA-HQ-OPP-2010-0684 – Cyfluthrin Registration Review Docket

The purpose of this letter is to comment on the Cyfluthrin Registration Review Docket that was made available for public comment on September 22, 2010 (75 FR 57782).

Tri-TAC is concerned that cyfluthrin has the potential to cause toxicity to aquatic organisms as a result of discharge into sewers from indoor uses; use in animal kennel/sleeping quarters (commercial), pet living/sleeping quarters, fabric treatments, pet products, automobiles, taxis, limousines, and recreational vehicles; and storm water inflow. Tri-TAC supports EPA's decision to conduct a down-the-drain assessment for cyfluthrin. Tri-TAC also supports the decision by the Offices of Pesticide Programs and Water to work together to refine the down-the-drain assessments for registration review. Finally, Tri-TAC supports EPA's decision to request monitoring data and additional aquatic toxicity data from publicly-owned treatment works (POTWs).

As background, Tri-TAC is a technical advisory group for 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. Our member agencies collect, treat, and reclaim more than two billion gallons of wastewater each day and we serve most of the sewered population of California.

In August 2010, Tri-TAC submitted comments on the open docket for bifenthrin. These comments are germane to the pyrethroid pesticide, cyfluthrin, for which a registration review workplan is proposed.

Cyfluthrin has been detected in POTW effluents and has very similar uses and pathways to bifenthrin. This cover letter provides the comments we shared with the bifenthrin docket and requests that the workplan for cyfluthrin be modified to address the same issues.

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@ccentralssan.org

Lorien Fono

Patricia McGovern Engineers
2242 Leavenworth Street
San Francisco, CA 94133
(510) 684-2993
lorienjf@gmail.com

Air Committee

Chair
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@lacsdsd.org

Conclusion

In conclusion, sewerage agencies need EPA's assistance to protect surface water from contamination from pesticides. POTWs are required by NPDES permits to meet effluent toxicity standards; however sewerage agencies do not have the authority to directly regulate pesticides. As detailed in the attached letter, when toxicity problems occur, they can be very costly for POTWs. Tri-TAC requests that information on the amount and use patterns of cyfluthrin discharged into sewers and the required aquatic toxicity data be collected, and the down-the-drain assessment be performed as part of the cyfluthrin registration review.

Tri-TAC appreciates the opportunity to comment on the Cyfluthrin Registration Review Docket. If you have any questions or require additional information, please contact Dr. Gail Chesler by phone at (925) 229-7294 or by email at gchesler@centralsan.org.

Sincerely,



Ben Horenstein
Tri-TAC Chair

Attachment: Tri-TAC Comment Letter on Bifenthrin

cc: Steve Owens, U.S. EPA Office of Preventing, Pesticides, and Toxic Substances
Steven Bradbury, U.S. EPA Office of Pesticide Programs
Rick P. Keigwin, Jr., U.S. EPA Office of Pesticide Programs
William R. Diamond, U.S. EPA Office of Pesticide Programs
Donald Brady, U.S. EPA Office of Pesticide Programs
Jack Housenger, U.S. EPA Office of Pesticide Programs
Timothy Kiely, U.S. EPA Office of Pesticide Programs
Lois Rossi, U.S. EPA Office of Pesticide Programs
Peter Silva, U.S. EPA Office of Water
Ephraim King, U.S. EPA Office of Water
James A. Hanlon, U.S. EPA Office of Water
Jared Blumenfeld, U.S. EPA Region 9
Alexis Strauss, U.S. EPA Region 9
Patti TenBrook, U.S. EPA Region 9
Syed Ali, California State Water Resources Control Board
Tom Mumley, RWQCB, San Francisco Bay Region
Nan Singhasemanon, California Department of Pesticide Regulation
Kelly D. Moran, Urban Pesticides Pollution Prevention Project
Dave Tamayo, CASQA
Jamison Crosby, CASQA