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October 15, 2012

Mr. Richard P. Keigwin, Jr.
Pesticide Reevaluation Division
Office of Pesticide Programs (7510P)
U. S. Environmental Protection Agency (EPA)
1200 Pennsylvania Ave., NW.
Washington, DC 20460-0001

Subject: FIFRA Pesticide Registration Review and ESA Consultation Processes;
Proposal Regarding Stakeholder Input - Docket ID Number EPA-HQ-
OPP-2012-0442

Dear Mr. Keigwin:

On behalf of Tri-TAC, we thank you for the opportunity to comment on U.S. EPA's "Proposal for Enhancing Stakeholder Input in the Pesticide Registration Review and ESA Consultation Processes and Development of Economically and Technologically Feasible Reasonable and Prudent Alternatives."

Tri-TAC is jointly sponsored by the California Water Environment Association, the League of California Cities, and the California Association of Sanitation Agencies. The constituency base for Tri-TAC collects, treats and reclaims more than 2 billion gallons of wastewater each day and serves most of the sewered population of California. Wastewater agencies must meet increasingly strict regulatory standards to protect our water resources for a broad array of beneficial uses. We take our responsibilities for safeguarding receiving waters seriously and are very concerned about discharges of certain chemicals into wastewater systems. It is essential that pesticide regulatory processes adequately consider impacts to wastewater treatment processes, wastewater effluent and biosolids, so that such impacts are prevented before they result in impairments to water quality, management issues with biosolids, and/or violations of NPDES permit requirements.

Tri-TAC supports the concept of EPA's proposed "Focus" meetings that would be held in advance of opening a registration review docket to solicit input early in the registration review process. However, Tri-TAC strongly recommends that EPA should make participation in "Focus" meetings available to all interested stakeholders, not just to registrants. Interested stakeholders would include wastewater treatment facilities as well as sister offices within US EPA, such as the Office of Wastewater Management, Office of Science and Technology, Office of Research and Development, and others. State regulatory programs should also be included.

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Thank you for your consideration of our comments. We look forward to providing whatever assistance is possible as this proposal is evaluated. If you have any questions or seek further clarification, please contact Greg Kester at gkester@casaweb.org or (916) 844-5262.

Sincerely,



Jacqueline Kepke, P.E.
Tri-TAC Vice-Chair

cc: Steven Bradbury, U.S. EPA Office of Pesticide Programs
Charles Andrews, California Department of Pesticide Regulation
Donald Brady, U.S. EPA Office of Pesticide Programs
Randy Hill, U.S. EPA Office of Wastewater Management
Betsy Southerland, U.S. EPA Office of Science and Technology
Chris Hornback, National Association of Clean Water Agencies