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Regulatory Public Docket (7502P)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460-0001  
Attn: Docket ID Number EPA-HQ-OPP-2008-0014

*Submitted electronically*

**Docket No. EPA-HQ-OPP-2008-0014- Tetramethrin Risk Assessments**

The purpose of this letter is to comment on EPA's risk assessments for tetramethrin, which were made available for public comment on February 27, 2008 (73 FR 10438). Tetramethrin is a pyrethroid pesticide used in indoor residential, commercial, institutional, and industrial sites for spot, crack, and crevice applications, house plants, clothing, bedding, pets, and pet premises. Tri-TAC is concerned that the ecological risk assessments do not provide adequate information to evaluate the potential adverse water quality effects associated with sewer discharges of tetramethrin from indoor uses. In addition to the environmental fate data provided by the registrants, information on the amount of tetramethrin used and the effects to aquatic organisms is needed for the ecological risk assessment. Furthermore, a Down-the-Drain model should be used to evaluate potential impacts to aquatic organisms due to the number of indoor uses with pathways to the sewers. As background, Tri-TAC is a technical advisory committee for publicly owned treatment works (POTWs) in California. Tri-TAC 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. Tri-TAC member agencies have been treating municipal wastewater for decades.

Tetramethrin is a broad-spectrum, first generation synthetic pyrethroid insecticide used for both indoor and outdoor residential, institutional, industrial, and horticultural use sites. It is also registered for use on pets and clothes. Tetramethrin is a rapid knockdown agent against flying and crawling insects. It is applied by spraying from an aerosol can, injection into

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cracks and crevices, by hand to pets, or dispersed into the air using a fogger can. It is frequently combined with a killing agent since knockdown may be transient. It may be co-formulated with synergists (PBO and MGK-264) and other active ingredients, such as permethrin, pyrethrins, and/or resmethrin, to provide residual activity against insects not exposed initially.

In the Revised Environmental Fate and Ecological Risk Assessment for the Reregistration Eligibility Decision on Tetramethrin dated February 5, 2008, EPA states that “The Down-the-Drain model will not be used to estimate exposure from indoor or outdoor uses, because the very short hydrolytic half-life of tetramethrin makes exposure via wastewater and wastewater treatment plant effluent unlikely.” Tri-TAC requests that EPA to conduct a Down-the-Drain Assessment on tetramethrin for several reasons.

Even though tetramethrin has a short hydrolytic half-life, tetramethrin discharged into the sewer system may be discharged in sufficient concentrations or may not degrade fast enough to prevent tetramethrin discharge into water bodies. In our decades of experience managing discharges of toxic pollutants to POTWs, we have found that even when most (70%, 90%, or even 99%) of a pollutant is removed, the small remainder can, in some cases, be sufficient to pose compliance challenges. Seemingly miniscule pollutant concentrations can exceed our effluent limitations, which can be established at part per billion, trillion, and quadrillion levels. POTWs also have a narrative standard prohibiting the discharge of toxics in toxic amounts. Also, transfers of pollutants into biosolids (e.g. metals) have limited biosolids disposal options for some California POTWs. These experiences make us acutely aware even though the vast majority of pollutant may degrade in the environment or be removed by POTW treatment processes, remainders of less than 1% can be problematic in some conditions.

EPA states in the Overview of Tetramethrin Risk Assessments dated February 2008, “due to the diffuse use patterns in primarily residential and commercial locations, annual usage data for tetramethrin is difficult to obtain.” An estimate of the amount of tetramethrin discharged into the sewer system is needed in order to estimate the amount of tetramethrin entering and exiting POTWs. If the annual indoor usage data for tetramethrin is difficult to obtain, the annual sales data for products with indoor uses may be an acceptable surrogate. Tri-TAC requests that EPA obtain an estimate of the amount of tetramethrin discharged into sewers in order to evaluate the potential adverse impacts to aquatic organisms from the indoor uses of tetramethrin.

Since the registrants of tetramethrin did not submit the required aquatic effects data, the impact to aquatic organisms was not fully evaluated in the ecological risk assessment. The acute toxicity of tetramethrin was tested in two species of freshwater fish and one freshwater invertebrate and tetramethrin was found to be very highly toxic to fish and invertebrates. However, no chronic toxicity data for freshwater animals or invertebrates, and no acute or chronic data for estuarine/marine fish or invertebrates were submitted. This data is essential to evaluate the potential adverse effects to

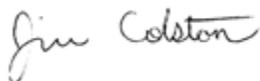
aquatic organisms from the use of tetramethrin. Tri-TAC objects to the reregistration of pesticides without required aquatic effects data and requests that EPA require the data prior to the reregistration of tetramethrin for indoor use.

Tri-TAC would like to clarify that tetramethrin can potentially enter the sewer system from many indoor uses. In addition to the use on clothing and pets, tetramethrin can enter the sewer system from use in indoor spot, crack, and crevice applications and application to indoor surfaces, floors, and carpets. Typically, indoor surfaces are usually cleaned with water (e.g. vinyl floors are mopped and carpets are steam cleaned) so tetramethrin also has a pathway to the sewer system from these uses.

In conclusion, sewerage agencies need EPA's assistance to protect surface water from contamination from pesticides. POTWs are required by National Pollution Discharge Elimination System permits to meet effluent toxicity standards; however Tri-TAC members do not have the authority to regulate pesticides. Tri-TAC requests that information on the amount of tetramethrin discharged into sewers and the required aquatic effects data be collected and evaluated prior to the reregistration of tetramethrin for indoor uses.

Thank you for the opportunity to comment on the risk assessments. If you have any questions or require additional information, please contact Ms. Preeti Ghuman by phone at (562) 699-7411 ext 2904, or by e-mail at [pghuman@lacs.org](mailto:pghuman@lacs.org)

Sincerely,



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