

From: [Doug Vangundy](#)
To: [Jennings, Jonathan \(ECY\)](#)
Subject: Comments to the draft NPDES permit for mosquito control
Date: Monday, March 08, 2010 2:15:43 PM
Attachments: [Comments to the draft NPDES permit for mosquito control.doc](#)

Dear. Mr Jennings,

Please find my comments to the draft NPDES permit for mosquito control in the form of a word document. Thank you for the opportunity to comment on this subject

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Comments to the draft Washington State “Aquatic mosquito control national pollutant discharge elimination system state waste discharge general permit “

I have recently reviewed the online version of the draft NPDES permit for mosquito control. During this review I was unable to locate a citation under allowable active ingredients for mosquito adulticides for the active ingredient etofenprox. This oversight is understandable since Etofenprox, under the trade name Zenivex E 20, is new to mosquito control. Zenivex was first presented to mosquito control in 2009.

Etofenprox is a pyrethroid ether, and as such, the chemistry is different than that of conventional pyrethroids. The Etofenprox molecule contains only carbon, hydrogen, and oxygen and does not contain side chains associated with some traditional pyrethroids that can cause skin sensitivity and respiratory irritation. Etofenprox has an extremely low avian and mammalian toxicity profile, rat oral LD50 value is >42,880 mg/kg, which is significantly lower than items commonly found in the household such as aspirin and caffeine. The EPA has given etofenprox a reduced risk classification.

The formulation of etofenprox is also unique among formulated pyrethroid mosquito adulticides. The Zenivex E20 product does not contain the synergist piperonyl butoxide (PBO) that is included in other pyrethroid mosquito products. Etofenprox controls mosquitoes at low application rates and as such the formula does not require PBO to control mosquitoes. This lack of PBO reduces the environmental load for PBO. Zenivex E20 is currently registered with the State of Washington.

Zenivex (etofenprox) offers the mosquito abatement districts in Washington State a reduced risk tool for use in the fight against disease carrying mosquitoes. I urge you to correct the oversight and place etofenprox among the mosquito adulticide choices that are listed in the draft permit.

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