

FINAL June 13, 2012

SFIREG POM Issue Paper

Pyrethroid Label Issues for Outdoor Applications

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Priority: High

Issue:

Current EPA required label language significantly restricts applications of pyrethroids to outdoor surfaces to “spot” and “crack & crevice applications”. While labels allow applications to be made for foundations to a height of 3 feet, eaves to be treated and door and window frames to be treated under “spot” and “crack & crevice” treatment, the siding areas from 3 feet to the eaves (excluding the windows and doors) continue to act as insect harborage and require treatment that is neither “spot” or “crack & crevice” (as defined in PR Notice 73-4) treatment.

The same pyrethroid labels allow broadcast applications to turf, ornamentals and foundation barrier applications immediately adjacent to outdoor surfaces without restrictions that similarly limit application.

Background:

A number of SLA’s including the CDPR, Indiana State Chemists Office, the Michigan Department of Agriculture & Rural Development, the Minnesota Department of Agriculture, the Ohio Department of Agriculture and the New Mexico Department of Agriculture have been receiving questions from applicators asking what the pyrethroid label restrictions mean in the context of how and where they have historically applied these products.

More SLA’s are expected to receive similar questions as the label restriction issue becomes better known to applicators and SLA’s and as the brown marmorated stink bug invasion moves to other states.

SLA’s such as the Minnesota Department of Agriculture are concerned that applicators inability to control exterior pests such as box elder bugs, Asian lady beetles and cluster flies (medical suites) and newly emerging pests such as the brown marmorated stink bug and kudzu bug may result in a greater number of outdoor applications to surfaces by professional applicators, excess applications by homeowners to both outdoor and indoor surfaces and possibly the misuse of products not labeled for such use or the use of inappropriate alternate products.

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Background (cont.)

In some instances, exterior surfaces are wooden (cedar siding, log homes) and require a complete protective surface spray to protect the wood from carpenter bees and other wood chewing insects. Complete exterior surface applications also occur in situations where forest pests such as gypsy moth and tent caterpillar infestations completely cover the exterior of a structure. In many cases these structures are located in suburban settings which are typically surrounded by treatable areas and rural settings where few if any impervious surfaces exist.

Single applications to siding from the 3 foot level to eaves should minimize the total number of applications and the overall amount of active ingredient applied.

The terms “spot” and crack and crevice” as defined in PR Notice 73-4 were intended to be used for residual insecticides in food handling establishments and are not consistent with conventional treatments to the exterior of buildings.

Recommendations:

EPA

1. SFIREG POM requests that EPA revisit current pyrethroid labeling to address the issues detailed in this issue paper.
2. SFIREG POM requests EPA assistance in clarifying and publishing a Pyrethroid Applicator Q&A.

The Q&A should address:

- **application process** (can application be made with a power sprayer, if more than a one story building do applications have to be made with a ladder or can someone use a power sprayer on street level, can crack & crevice applications be made along with spot treatments?);
- **under eaves** (precautions over impervious surfaces, is it limited to spot application or can a broadcast application be made?);
- **applications when rain/precip is predicted** (what is legally required?);
- **clarification of label language regarding Cluster Fly control** – APPLICATION FOR OUTDOOR PERIMETER PESTS (appears to allow application to siding – could be misinterpreted to allow application above 3 feet);

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Recommendations (cont.)

- **clarification regarding APPLICATION FOR WOOD-INFESTING PESTS** – Wood-Infesting Beetles (appears to allow to wood surfaces without limitation/except that a covering of impervious surfaces is required, what about other wood infesting insects?);
- **clarification regarding whether cleanup is mandatory** for spilled granular product on impervious surfaces

SFIREG POM

1. Assist EPA in the development of pyrethroid label Q&A's on the EPA's website for outdoor applications.
2. Provide alternative DRAFT label language to EPA to allow exterior surface application of pyrethroids above 3 feet for a limited number of applications to surfaces covering an area that is greater than a spot or crack and crevice application, total product used for each application (i.e. max amount of product/XXXX sq. ft.) and prohibition of applications to exterior surfaces that are located above impervious surfaces or a requirement to cover impervious surfaces to capture overspray or runoff.