



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Mr. Derrick Lastinger
President, Association of Structural Pest Control Regulatory Officials
Program Director, Structural Pest Control Section
Georgia Department of Agriculture
19 Martin Luther King, Jr. Drive SW
Atlanta, Georgia 30334-4201

Ms. Bonnie M. Rabe
Chair, ASPCRO Label Stewardship Committee
Division Director, New Mexico Department of Agriculture

Dear Mr. Lastinger and Ms. Rabe:

Thank you for your letter of June 13, 2012, on behalf of the Association of Structural Pest Control Regulatory Officials (ASPCRO) regarding EPA's 2009 labeling initiative for pyrethroid non-agricultural outdoor products. EPA appreciates your feedback on this initiative and welcomes the opportunity to address the concerns raised by the ASPCRO Label Language Committee.

As you know, the goal of EPA's 2009 labeling initiative was to limit offsite runoff of pyrethroids in non-agricultural outdoor products while ensuring the application of these products in an efficient and efficacious manner to treat the target pests. The new label statements regarding good stewardship, best management practices, and environmental hazards are meant to clarify how outdoor pyrethroid products are intended to be used by both professional pesticide control operators (PCOs) in residential, commercial, institutional, and industrial areas and residential/homeowner users. EPA recognizes that any time labeling changes are required, despite our best attempts at label clarity, questions and unique situations may arise in the field. We are happy to receive input and provide clarifications and/or revisions, where appropriate.

Your letter discussed approximately 10 issues and concerns with various label statements included in the 2009 labeling initiative including the Environmental Hazards Statements, statements regarding preconstruction termiticide treatments, limitations regarding spot and crack-and-crevice treatments, and applications to vertical surfaces. I appreciated the opportunity to provide background information as a member of the "Pyrethroid Label Changes" panel during the State FIFRA Issues Research & Evaluation Group (SFIREG) meeting here at EPA on June 18, 2012, and to discuss ASPCRO's concerns with you and the states in person.


Since many pyrethroid product labels containing the updated language have started to reach the consumer market, EPA has received similar questions on the 2009 pyrethroid labeling initiative

from other groups such as the National Pest Management Association (NPMA), SFIREG, and the California Department of Pesticide Regulation (CDPR). While many of the labeling comments and requests for clarification focus on similar aspects of the pyrethroid initiative, each stakeholder group has different viewpoints, priorities, and specific recommendations. The group of stakeholders interested and affected by the non-agricultural pyrethroid outdoor labeling is broad (e.g. states, pesticide registrant companies, applicators, homeowners, non-profit groups), and EPA must use a comprehensive approach and weigh available options to determine the best path forward.

The Agency is currently evaluating the input we have received and is considering the best course of action for responding to and accommodating these labeling concerns. In the coming months, as a path forward is developed, EPA will be in contact with interested stakeholders to discuss more specific proposals, and at that time the Agency will respond to the specific concerns raised in ASPCRO's letter. Because ASPCRO's questions could affect other stakeholders, the Agency plans to make your June 13 letter and this response letter publicly available on our website for the 2009 pyrethroid non-agricultural outdoor product labeling initiative¹.

Again, thank you for your letter. If you have further questions or comments, please contact Monica Wait of my staff at wait.monica@epa.gov or (703) 347-8019.

Sincerely,


Richard P. Keigwin, Jr., Director
Pesticide Re-evaluation Division
Office of Pesticide Programs

cc: Steven P. Bradbury, Director, Office of Pesticide Programs
Lois Rossi, Director, Registration Division
Monica Wait, Pesticide Re-evaluation Division
Richard Gebken, Registration Division
Mark Suarez, Registration Division
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¹ <http://www.epa.gov/oppsrrd1/reevaluation/environmental-hazard-statement.html>