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February 25, 2013  
Label Language Stewardship Committee  
2013 ASPCRO Mid-Year Board Meeting Report

On behalf of the ASPCRO Label Language Stewardship Committee, (3C), I submit the following report for the 2013 mid-year board meeting.

Since the annual meeting report, the committee continued to primarily work on issues related to EPA's pyrethroid label language. Also, some continued work was completed to finalize the previous efforts addressing problematic bed bug language.

### **Pyrethroid Non-Ag Outdoor Label Language**

As discussed in the previous report in August 2012, ASPCRO and NPMA planned and conducted a hands-on workshop for EPA staff on September 18, 2012 at the NPMA offices. The workshop provided an opportunity to demonstrate and discuss the management of structural pests and how treatment using pyrethroids is affected by the pyrethroid mitigation language. Approximately 25 EPA staff, members of ASPCRO and AAPCO, pest management industry representatives, and researchers gathered for a presentation on pertinent pest management situations frequently encountered in residential settings. Dr. Dan Souter, University of Georgia, Mike Waldvogel, North Carolina State University and Jim Fredericks, NPMA made presentations. The group then walked over to a nearby home for further demonstration and visuals of the situations discussed including foundation types, exterior coverings, construction types, landscaping, and pest harborage and treatment areas.

After the training, further discussion continued with EPA to finalize the label language. The committee members provided further input on additional suggestions. EPA proposed further revisions adding additional language to which the committee and ASPCRO provided comment from a regulatory standpoint. This included stating:

- The application for occasional and congregating pests allowed by the proposed revised language did not increase the risk of runoff, the main reason for the mitigation language, as it still only permitted applications over allowable areas;
- A concern for setting the precedent of requiring pest presence and the burden of enforceability;
- Language such as 'likely to occur' or 'recently observed' is not clear and concise (observed by whom and what is 'likely'?).

After further discussion of the above concerns, EPA agreed to final language supported by ASCPRO, AAPCO/SFIREG, and NPMA. In January 2013 EPA indicated their acceptance of the revised language (see attachment 1). Information and the final language can be found on the EPA website at:

<http://www.epa.gov/oppsrrd1/reevaluation/environmental-hazard-statement.html>

The final revised language is as follows:

“All outdoor applications, if permitted elsewhere on this label, must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses, if allowed elsewhere on this label:

1. Applications to soil or vegetation, as listed on this label, around structures;
2. Applications to lawns, turf, and other vegetation, as listed on this label;
3. Applications to the side of a building, up to a maximum height of 3 feet above grade;
4. Applications to underside of eaves, soffits, doors, or windows permanently protected from rainfall by a covering, overhang, awning, or other structure;
5. Applications around potential pest entry points into buildings, when limited to a surface band not to exceed one inch in width;
6. Applications made through the use of a coarse, low pressure spray to only those portions of surfaces that are directly above bare soil, lawn, turf, mulch or other vegetation, as listed on this label, and not over an impervious surface, drainage or other condition that could result in runoff into storm drains, drainage ditches, gutters, or surface waters, in order to control occasional invaders or aggregating pests.

ASPCRO has agreed to produce a guidance document that explains the decision, promotes IPM, etc. The committee is working on that document. Plans are to make it available on the ASPCRO website.

### **Label Language Guideline Document**

While members of the committee continue efforts in development of a label language guideline document, due to the focus on pyrethroid language, further revisions have not been completed. Discussion will also continue on development of a consolidated approach to label issues as indicated in the previous committee report.

### **Problematic Bed Bug Language**

The document provided in the annual meeting report was given another review by the bed bug committee, who provided further comments. RISE also provided comments. See attachment 2 for the current draft report. Upon final review by the Board, the document will be sent to EPA for consideration. It is hoped this will result in improved language a better understanding of the language for those utilizing bed bug products and fewer issues related to misuse of pesticides for treatment of bedbugs.

Respectfully submitted,



Bonnie Rabe, Chair and ASCPRO Past President

