



April 9, 2012

Rick Keigwin
Director
Pesticide Re-evaluation Division
Office of Pesticide Programs
United States Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Mr. Keigwin:

Thank you for making time to meet with me and other pest management professionals (PMPs) from Ohio relative to the label changes for non-agricultural outdoor uses of pyrethroid insecticides. We were very pleased to have the opportunity to meet with you because this is a very important matter to us. We all appreciated the opportunity to briefly discuss our issues and concerns, and most importantly that you were willing to have us give you direct input about this matter. We also appreciate that you stated that some issues can still be negotiable!

So, here is our input and we ask that you give consideration to our concerns and comments for the non-agricultural outdoor uses of pyrethroids.

Our biggest concern is the substantial limitations of the allowable uses of pyrethroids for outdoor surface applications to structures. The concerns we have are with the effect that these limitations will have on our ability to provide effective control of occasional invaders, particularly spiders, box-elder bugs, Asian multi colored lady beetles, cluster flies, and the recently increasing brown marmorated stink bugs. We feel that broader coverage is necessary to effectively control these target pests by directly contacting those pests that are resting on the structure at the time of the application and to provide an effective residual barrier against those target pests that will migrate to these areas following the application. It is common for these pests to rest on these treated surfaces, particularly as dusk arrives and they are seeking heat sources as the evening air cools, which then provides for their control. Our treatment goal is to provide control of these seasonal pests outdoors *before* they get into the structures.

Achieving control with outdoor applications is critically important. These applications are designed to prevent entry to the indoor environment of the property thereby limiting or eliminating the need for interior applications of

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pesticides. The mere treatment around doors and windows is not adequate to provide effective control in many, if not most, situations.

Many exterior sidings are comprised of overlapping, “clapboard style” coverings that provide an extensive array of cracks and crevices across the entire expanse of the exterior area of the structure. Even brick and mortar exteriors offer difficult to reach cracks that can permit access of pests to the interior of the structure eventually leading to the need for indoor treatments.

Without a doubt, performing treatments indoors for these pests is best avoided if possible as it will require more frequent applications of a variety of pesticide products – fogs in attics, dusts in wall voids, sprays around window sills, vents etc., and yet will not provide anywhere near the level of control. Once these pests gain access into the attic, walls, overhangs, behind siding, etc. and the weather cools off, these pests will not go back outside until the next spring, but they will come into the heated areas of structures resulting in the property owner/resident’s need to deal with the pests through additional interior pesticide applications performed by either themselves or a professional.

Another aspect of these label changes/limitations is the concept that the treatment to the exterior surface of a home will contribute to runoff away from the structure. Our thinking is that what might run off a vertical exterior surface, will run off to the foundation area and /or the soil perimeter of the structure where an application is allowable. So, if the product will end up in the same place as it is allowable, what is the problem?

Lastly, I don’t know how aware you are of the fact that in most cases of broadcast or general exterior building surface treatments, the actual concentration of the spray mixture is considerably lower than the full label rate! The concept being that we can apply a lower actual amount of active ingredient using a larger volume of the carrier (water) so we can provide a more thorough application to the exterior surfaces. The full label rate in these broad spray treatments is not necessary for these occasional invader pests, what is critically important is the timing of the application and the broad coverage.

Specifically, we would like you to consider altering the revised labeling to allow the application of these products:

1. for the above referenced pests (occasional invaders, including spiders, box-elder bugs, Asian multi colored lady beetles, cluster flies, and brown

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- marmorated stink bugs) , provided that:
2. the application to the siding (vertical surface) is at a lower concentration.
 3. Care should be given to avoid runoff on impervious surfaces.

Please review our concerns and comments and I hope that you will agree that there should be some more work done in the review of the allowable outdoor uses for pyrethroids.

As members of the Ohio Pest Management Association and the National Pest Management Association, we look forward to a continuing dialog and the opportunity to work on these important matters with you. Please call on us for any additional information that you may need.

Sincerely,

A handwritten signature in black ink, appearing to read "Hank Althaus". The signature is fluid and cursive, with a prominent initial "H" and a long, sweeping tail.

Hank Althaus
President
Ohio Pest Management Association