



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MEMORANDUM

Subject: Enforcement Case Review # FY01-VII-025, dated September 17, 2001
Products: Demand CS Insecticide
EPA Registration Number: 10182-361

OCT 31 2001

From: Richard J. Gebken
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Registration Division/OPP 7505C

TO: Mary McDonnell
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Washington, D.C. 20460

The Insecticides Branch (IB) has reviewed the subject pesticide label, and associated documentation submitted for the Enforcement Case Review FY01-VII-025, dated September 17, 2001.

The subject product Demand CS Insecticide was officially transferred on February 23, 2001, and the new EPA registration number is 100-1066.

The Directions for use list the following information:

GENERAL INFORMATION: STRUCTURAL AND PERIMETER PEST CONTROL

FOR USE AS A GENERAL SURFACE (NONFOOD/NONFEED AREAS), CRACK AND CREVICE OR SPOT TREATMENT IN, ON, AND AROUND BUILDINGS AND STRUCTURES AND THEIR IMMEDIATE SURROUNDINGS AND ON MODES OF TRANSPORT. PERMITTED AREAS OF USE INCLUDE, BUT ARE NOT LIMITED TO, INDUSTRIAL BUILDINGS, HOUSES, APARTMENT BUILDINGS, LABORATORIES, BUSES, GREENHOUSES (NON-COMMERCIAL), STORES, WAREHOUSES, VESSELS, RAILCARS, TRUCKS, TRAILERS, AIRCRAFT (CARGO AND OTHER NON-CABIN AREAS ONLY), SCHOOLS, NURSING HOMES, HOSPITALS, RESTAURANTS, HOTELS, LIVESTOCK/POULTRY HOUSING, PET KENNELS, FOOD GRANARIES, FOOD GRAIN MILLS, AND FOOD MANUFACTURING, PROCESSING AND SERVICING ESTABLISHMENTS.

Although the label does not specify "Boat Houses" directly, the description above would include such a structure. In addition, the application of this product around vessels would be acceptable.

Within the section entitled "Outdoor Surface Use" the following label language is listed:

For control of ants, bees, centipedes, cockroaches, crickets, fleas, flies, millipedes, mosquitoes, scorpions, sowbugs, pillbugs, spiders, termites (above ground only), ticks, wasps and other similar perimeter arthropod pests. Apply with either hand or power application equipment as a residual treatment to ornamental plants next to foundations of buildings and to surfaces of buildings, porches, screens, window frames, eaves, patios, garages, refuse dumps and other similar areas where these insect pests are active."

This is consistent when evaluating Boat Houses as a use site for this product. The terms "surfaces of buildings," and "eaves" are components of a boat house.

It is agreed by the Agency's Insecticide Branch that application of this product would require careful use to insure that runoff during surface application does not occur to conform to the Environmental Hazard's statement of "Do not apply to water" or other restrictive language such as "Do not allow applications to contact water inhabited by fish, . . .". the term "Use of this pesticide adjacent to water may affect aquatic organisms."

The statement: "To protect these organisms, do not apply this pesticide within 25 feet of lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries and commercial fish farm ponds." is intended to apply for applications to Lawns/turf grass and ornamentals, where a buffer zone is necessary to prevent inadvertent spray or runoff.

If you have any questions, you may contact Richard J. Gebken, at (703) 305-6701.

attachments