

EFFICACY STUDY REVIEW

by Kevin J. Sweeney, Entomologist - IB

Kevin J. Sweeney
9/19/02

To: William Sproat

Date: September 18, 2002

EPA Reg. No. or File Symbol: 1021-1667 and the data has been submitted to also support the efficacy of 7056-185, a substantially similar product.

Product Name: Evercide House and Garden Spray 2664

Registrant: MGK

PM: George LaRocca

Action: 305

Submission No. S615352 DP # : D283211

Chemical: 0.2% permethrin; tetramethrin 0.2% Type: (I) Insecticide

OPPTS Guidelines: 810.35

Sites indoor and outdoor residential

Pests: many residential pests

Formulation: RTU

Studies Submitted:

MRID 45666601 Evercide House and Garden Spray 2664 Product Performance/Efficacy Reports by MGK Company.

This is a compilation of efficacy studies with the following pests: German cockroaches, mosquitoes, yellow jackets, brown dog ticks, fleas, deer ticks, ticks, and scorpions. Data are included for "kills only" claims and to support residual product performance. My comments are based on the 24 hour mortality results for the direct spray and aged panel studies.

In these studies tetramethrin and neo-pynamin are the same chemical.

Entomologist's Comments and Recommendations:

1. The data support German cockroach "kills only" and fast knockdown claims for the subject products.
2. The data support the mosquito "kills only" claims for the subject products.
3. The yellow jacket studies were conducted with synergized pyrethroid formulations that were not substantially similar to the formulation of the subject products. Therefore, these efficacy data are considered supplementary data and do not support labeled yellow jacket claims. Submit or cite data.
4. The data do not support residual claims with brown dog ticks when applied at the rate of 1 gallon/1000 square feet. The aged panel studies were only successful for foil but were below the performance standard for wood and tile. The product should be efficacious on all tested surfaces.
5. Data were also submitted from testing with dogs. Direct spray application and pet dip data were submitted for permethrin treatment only. However, the labels says not to spray the product on pets and humans. Data from pet treatments cannot be bridged or used to satisfy residual surface treatment claims. The data should be generated with the subject product, not just one active ingredient. Formulas substantially similar to the subject products need to be tested.
6. The data support the "kills only" claims against scorpions with the subject products. However, product specific data or data performed with 0.2% concentrations of the subject active ingredients should be done and submitted in the future.
7. In conclusion, the registrant needs to cite/submit data for American cockroaches, bedbugs, biting lice, ticks, yellow jackets, hornets, wasps, biting flies, fleas, and dust mites or remove these claims from the label. In addition, the fast or quick knockdown claims are only supported for German cockroaches.