

## EFFICACY STUDY REVIEW

by Kevin J. Sweeney, Entomologist - IB

To: Ann Sibold

Date: May 3, 1999

EPA Reg. or File No.: 241-EUP-141

Product Name: Phantom Termiticide-Insecticide

Registrant: American Cyanamid

PM: Marion Johnson

Action: 715

Submission No(s). S561028, DP D255507

Chemical: chlorfenapyr insecticide (I)

Label review for amended EUP application. Addition of more site-use patterns and pests.

**Studies Submitted: NONE**

The amended application requests more outdoor uses on the label, including termite control in trees and ant control with a residual perimeter or direct treatment (one the most common outdoor pesticide applications sold by PCOs and sought by homeowners). The species to be controlled by perimeter treatment are not specified but may be inferred to be the same as those named below for indoor treatments. For direct outdoor treatments to ants, the label instructs the user to apply to sites of fire ant mounds and/or carpenter ant colonies. The carpenter ant treatments include outdoor sites such as wooden structures, decking etc. For indoor use, the label lists many common non-food and food/feed sites. The label lists the following ants: acrobat ants, Argentine ants, carpenter ants, fire ants, odorous house ants, pavement ants, Pharaoh's ant, pyramid ants, and a caveat, and "other ants", that allows the user to make application for the control of any house-hold or structure invading ant. For termites, the registrant requested the addition of foam applications for treatment of hard to access location in order to maintain a continuous barrier. The same application rates are requested for termite and ant control.

The application to termite infested trees was requested again. It should be denied because: 1) in trees, systemic translocation with chlorfenapyr is not apparent; 2) the most common target species, the Formosan termite, is found on trees most frequently beneath the tree bark where a chlorfenapyr application can not affect them; and 3) the use of this long lived insecticide in trees may present exposure or toxicity hazards to wildlife and/or humans.

Further comment or review from HED and EFED on wildlife hazards, residential exposure, food tolerances etc., should be considered before approving the indoor and outdoor ant control uses.

My recommendations are as follows:

1. Approve the addition of foam applications for termite control.
2. Deny the request to apply chlorfenapyr to control termites in trees.
3. Approve outdoor ant control if EFED approves.
4. Indoor ant use - the label is fine if the uses are allowed but please consider the hazards and exposures of such applications with this long lived compound. The food/feed areas issue needs to be resolved before approving this use pattern.
5. I see no problem with the addition of more states.
6. The precautionary statement does not read as instructed in Marion's March 6, 1998 letter.
7. The instructions for the section entitled "Accessible Crawl Spaces" do not conform to Marion's instructions in his March 6, 1998 letter or PR Notice 96-7. The disclaimer has been changed but doesn't appear to fulfill Marion's directive either.
8. In the section entitled "Inaccessible Crawl Spaces", in paragraph 1, replace the phrase, "horizontal treated zone" with the phrase, "horizontal treated barrier" and in paragraph two, replace the phrase, "horizontal zone", with the phrase "horizontal barrier". This wording is required as outlined in PR Notice 96-7.
9. Under carpenter ants - remove "trees"

