



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MEMORANDUM

PC Code: 097805

DATE: October 31, 2012

SUBJECT: Verification Memorandum for Deltamethrin for SF Bay Species

FROM: Joel Wolf, Chemical Review Manager
Risk Management & Implementation Branch 2
Pesticide Re-evaluation Division (7508P)
AND
Mark Suarez, Product Manager 13
Insecticide Branch, Registration Division (7505P)

THRU: Cathryn Britton, Team Leader
Risk Management & Implementation Branch 2
Pesticide Re-evaluation Division (7508P)

TO: Rochelle Richardson
Executive Assistant to the Director
Environmental Fate and Effects Division (7507P)

This memorandum serves to provide additional information on the use pattern of deltamethrin not captured in the LUIS process. RD and PRD's role in the verification process are to fill information gaps and provide division appropriate expertise as outlined in the LUIS Verification SOP for RD and PRD.

PRD provides information and status regarding changes to the chemical use (such as application parameters, cancellations, or label language) that occurred as a result of the reregistration process. RD provides information regarding changes to the chemical use that may have occurred after the date of the LUIS label extraction. In the case a "Data Doer Only"¹ report was conducted, the CRM and PM will ensure that all highest application rates are reflected on the EFED Spreadsheet. The CRM and PM have drafted the "Registration and Reregistration

¹ This type of LUIS report is conducted when the AI of interest has more than 50 products. This report will contain: 1. Products actively registered to the data doer; 2. All technical registrations regardless of registrant; 3. All active California special local needs (SLN) registrations.

Verification” section of this memo to clarify knowledge gaps a risk assessor may encounter while using the data contained in the LUIS report.

Finally, if further clarification is needed, please contact Joel Wolf (703-347-0228) and Mark Suarez (703-305-0120).

Registration and Reregistration Verification

Date and Scope of the RED

- Deltamethrin did not go through the reregistration process because the Agency first registered this active ingredient after the re-registration cutoff date of November 1, 1984 [FIFRA, sec 4(a)]. Therefore, a RED was not completed for deltamethrin, which was first registered in 1994.

Required Through the RED Process

- List any cancelled uses as part of the reregistration process.
 - Not applicable, not subject to a RED
- List any rate changes that occurred as part of the reregistration process.
 - Not applicable, not subject to a RED
- Indicate whether mitigation has been required through the reregistration process and whether any or all of the mitigation has been implemented on the product labels.
 - Not applicable, not subject to a RED

Product Reregistration

- Deltamethrin did not go through the reregistration process because the Agency first registered this active ingredient after the re-registration cutoff date of November 1, 1984 [FIFRA, sec 4(a)]. Therefore, a RED was not completed for deltamethrin, which was first registered in 1994.

Label Extraction Analysis

- A “Refined” LUIS report (previously known as “data doer”/partial reports) was conducted for deltamethrin on September 17, 2012. The chemical review manager has verified, by checking labels that were not extracted in the LUIS report, that the Ecological Fate and Effects Spreadsheet includes the maximum use rates that appear on the active labels.

- The highest use rates for deltamethrin Section 3 registrations are for applications that would not be used on a per acre basis. Those applications are spot or crack and crevice applications, around utility poles and building perimeters, indoor pest control, pole and tree banding, pallets, wood surfaces, ant and termite mounds, and sewer manholes.
- The highest rate appears on product number 13283-23 (granular) which have a maximum application rate of 27.2 lb a.i./A with applications confined primarily to around telecommunication and utility equipment (cables, poles, etc.). The area where the application occurs is limited to the location of the equipment and, thus, would not be used on a per acre basis.
- Other high application rates for deltamethrin are 26.329 lb a.i./A (432-763 and 87276-9), 26.12 lb a.i./A (432-1514), 25.996 lb a.i./A (53883-276), and 13.61 lb a.i./A (13283-27). These rates are for applications such as indoor pest control, spot or crack and crevice applications, pole and tree banding, pallets, wood surfaces and sewer manholes which would not be used on a per acre basis.
- The highest rate that can be applied outdoors as a general surface spray to areas around buildings like lawns and ornamental plants is 0.2177 lb ai/A (432-832). These applications are made with handheld or power sprayers.

Registration Division Review

- No actions have occurred nor applications received since October 5, 2012 that impacts the use or application of the active ingredient (including new uses, deletion of uses, changes to application parameters, etc.).
- No application rates have changed since October 5, 2012. The corrected LUIS report provided by BEAD on October 1, 2012 for deltamethrin accurately reflects label application rates.