

## APPENDIX L. Additional Use Information for Deltamethrin

### *Mitigation Measures*

**Agricultural products mitigation measures:** The agricultural mitigation measures are included in the following website: <http://www.epa.gov/oppsrrd1/reevaluation/epa-letter.pdf>, accessed 01/23/2013.) “In the reregistration process for permethrin and cypermethrin [synthetic pyrethroids like deltamethrin], the Agency determined that the existing spray drift language for pyrethroid agricultural products needed to be updated to comply with FIFRA. Because of similarities in use patterns, and concern for exposure to aquatic resources, the Agency believes that this updated label language is necessary for all pyrethroid products used on agricultural crops. In a [letter from the Agency](#), dated February 21, 2008, registrants were instructed to incorporate the revised spray drift language onto their agricultural labels, and submit the amended labels to the Agency.” (Information obtained from the following site accessed 01/23/2013: <http://www.epa.gov/oppsrrd1/reevaluation/pyrethroids-pyrethrins.html#eco>.) Label restrictions included the use of a 10 ft vegetative filter strip of grass or other permanent vegetation “between the field edge and down gradient aquatic habitat (such as, but not limited to, lakes; reservoirs; rivers; permanent streams; marshes or natural ponds; estuaries; and commercial fish farm ponds).” Furthermore, the agricultural products should not be applied by ground equipment within a distance of 25 ft, or by aerial equipment within a distance of 150 ft, or by ULV within a distance of 450 ft from freshwater or estuarine/marine bodies of water (*e.g.* lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries and commercial fish farm ponds). Other restrictions regarding wind direction and speed, temperature inversions and, particularly droplet size, were required. A medium or coarser droplet (ASAE S572) should be used in agricultural settings. The chemical should not be applied when wind speed exceeds 15 mph.

**Non-agricultural products mitigation measures:** The non-agricultural mitigation measures are included in: <http://www.epa.gov/oppsrrd1/reevaluation/environmental-hazard-statement.html>, accessed 01/23/2013. “To reduce exposure from residential uses of pyrethroids, EPA is requiring revised Environmental Hazard Statements and general Directions for Use for pyrethroid pesticide products used in non-agricultural outdoor settings. The label statements spell out good stewardship and best-management practices and clarify how these types of products are intended to be used.

These label statements will serve to reduce the potential for runoff and drift to water bodies that can result from applications of pyrethroid end-use products in residential, commercial, institutional, and industrial areas, applied by both professional pesticide control operators and residential consumers.”

“The revised “Environmental Hazard Statements” and “Directions for Use” label language are captured in the Environmental Hazard and General Labeling for Pyrethroid Non-Agricultural Outdoor Products [Label Table](#).” “A [notification letter](#) was sent to all pyrethroid registrants on June 4, 2009, requesting that they adopt these label statements on their products containing pyrethroid active ingredients with registered uses on non-agricultural outdoor areas by June 4, 2010.” The statements should be found in the Environmental Hazards or Directions for Use

sections of the labels (refer to the [Label Table](#)). Mitigation and instructions in the labels are summarized below:

- For liquid applications (*i.e.*, liquid concentrate or liquid ready to use, except aerosols), and dust consumer products, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters, further, suggest applying in calm weather and when rain is not forecasted for the next 24 hours.
- For products labeled for preconstruction termiticide applications (such as deltamethrin), the treatment site must be covered prior to a rain event in order to prevent runoff of the pesticide to non-target areas, the applicator must cover the treated soil within 24 hours of application (or in lieu of the applicator, a contractor must do it). Furthermore, the labels state, “[d]o not apply within 10 feet of storm drains. Do not apply within 25 feet of aquatic habitats (such as, but not limited to, lakes; reservoirs; rivers; permanent streams; marshes or ponds; estuaries; and commercial fish farm ponds),” among other restrictions.
- The following is a restriction for general outdoor surface and space sprays, except for foggers: “All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:
  - (1) Treatment to soil or vegetation around structures;
  - (2) Applications to lawns, turf, and other vegetation;
  - (3) Applications to building foundations, up to a maximum height of 3 feet.”
 “Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches and structural surfaces (such as windows, doors, and eaves) are limited to spot and crack-and-crevice applications, only.”
- General Application Restrictions for all products that contain directions for use in drains or sewers: “Do not apply directly to sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur, except as directed by this label.”

**Table L1. Uses Not Assessed**

USE	REASON WHY IT IS NOT ASSESSED
SOYBEANS	Crop is not grown in CA.
ANIMAL BURROWS, HARBORAGES OR DENS OF PLAGUE RESERVOIR HOSTS	Limited exposure to wildlife is expected.
ANIMAL HOUSING PREMISES (INDOOR)	Indoor treatments are expected to have limited exposure to wildlife.
AUTOMOBILES, TAXIS, LIMOUSINES, RECREATIONAL VEHICLES, & TIRES	Indoor treatments are expected to have limited exposure to wildlife.
Barley, Oats, Rice, Rye, Wheat (Stored Commodity), GRAIN/CEREAL/FLOUR BINS-EMPTY; GRAIN/CEREAL/FLOUR STORAGE AREAS-EMPTY	Indoor treatments are expected to have limited exposure to wildlife.
BEVERAGE PROCESSING PLANT PREMISES (NONFOOD CONTACT)	No dosage conversion
<b>CABLES/CABLE COVERINGS (VERT. PEST CONTROL)</b>	<b>CHECK</b>
COMMERCIAL/INSTITUTIONAL/INDUSTRIAL PREMISES/EQUIP. (INDOOR)	Indoor treatments are expected to have limited exposure to wildlife.
COMPOST/COMPOST PILES	No dosage conversion
DAIRY FARM MILK STORAGE ROOMS/HOUSES/SHEDS	No dosage conversion
<b>DOGS/CANINES (ADULTS/PUPPIES)</b>	<b>CHECK</b>
FRUITS (UNSPECIFIED) (Trunk Drench)	No dosage conversion

USE	REASON WHY IT IS NOT ASSESSED
GREENHOUSE-EMPTY; GREENHOUSES-IN USE	Indoor treatments are expected to have limited exposure to wildlife.
HOUSEHOLD/DOMESTIC DWELLINGS INDOOR FOOD HANDLING AREAS	Indoor treatments are expected to have limited exposure to wildlife.
HOUSEHOLD/DOMESTIC DWELLINGS INDOOR PREMISES	Indoor treatments are expected to have limited exposure to wildlife.
MORGUES/MORTUARIES/AUTOPSY/EMBALMING ROOM PREMISES	Indoor treatments are expected to have limited exposure to wildlife.
PAPER/PAPER PRODUCTS	Indoor treatments are expected to have limited exposure to wildlife.
PUBLIC BUILDINGS/STRUCTURES (VERT. PEST CONTROL)	No dosage conversion
SHIPS AND BOATS	Indoor treatments are expected to have limited exposure to wildlife.
WOOD PROTECTION TREATMENT TO BUILDINGS/PRODUCTS INDOOR	Indoor treatments are expected to have limited exposure to wildlife.
WOOD PROTECTION TREATMENT TO FOREST PRODUCTS (SEASONED)	No dosage conversion