

US EPA ARCHIVE DOCUMENT



**US Environmental Protection Agency  
Office of Pesticide Programs**

**Record of Meeting Memorandum of  
October 8, 2009, with S.C. Johnson Company**

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## RECORD OF MEETING MEMORANDUM

**SUBJECT: October 8, 2009 Meeting with S. C. Johnson Company**

**FROM: Jim Roelofs, Government and International Services Branch  
Field and External Affairs Division, Office of Pesticide Programs**

Meeting was requested by S.C. Johnson Company (hereafter, SCJ) and attended by 7 company representatives. Eight EPA employees attended including the OPP Office Director for part of the meeting. EPA indicated that the meeting was viewed as a listening session for the Agency and that there would be no substantive discussion of the Agency's on-going assessment of TRFs.

### 1. Purpose of the meeting.

To have SCJ present their views on some of the issues raised in the NY petition to classify total release foggers (TRFs) for restricted use, including:

- How SCJ tests product efficacy
- Relative benefits of TRFs
- Issue of flammability risk
- Additional ways to mitigate risk
- Further work being done by SCJ to mitigate risk concerns.

### 2. Efficacy testing

- SCJ described TRF efficacy testing which involves a partially partitioned room with a TRF on one side and roaches sheltered in covered cups on the other side of the partition.
- SCJ showed a video of the test procedure.
- SCJ contended this is a reasonable test simulation of conditions of use.

### 3. Benefits

- SCJ stated that professional pest control treatment in NY City would cost at least \$100 and likely more.
- SCJ stated that their own consumer surveys indicate high satisfaction with TRFs.

### 4. Flammability issue.

- SCJ stated that the risk of fires and explosions is quite low.
- SCJ showed a video of 3 TRFs set off in a small room with 3 active ignition sources; no fire or explosion resulted.
- SCJ indicated that there is a non-flammable propellant being used in some products, but is difficult to get from overseas source and may be taken out of consumer products in the future since it is a green house gas.

5. Further steps by SCJ to mitigate risk.

- SCJ indicated support for label improvements as recommended in the Morbidity and Mortality Weekly Report article of October 2008.
- SCJ noted that they had undertaken label improvements in the 1990s in response to the reports of the Consumer Labeling Initiative.
- SCJ indicated support for the general idea of marketing smaller units and fewer units per package.
- SCJ agreed with MMWR article recommendation to warn others of a treatment and showed EPA a door hang-tag that could be provided with TRF products that would accomplish this.
- SCJ is working on a TRF that would have delayed release so user can better vacate premises; however, test models have reliability problems. A video of such a prototype product was shown.
- SCJ is continuing to look for alternative propellants.

**Conclusion**

EPA stated that the Agency assessment was on-going, but EPA encouraged SCJ to continue to pursue the various mitigation steps the company described. EPA noted that label improvements could be achieved in a relatively short time, while engineering improvements such as delayed activation may have to be pursued over a longer time.