Update: Total Release Foggers

Issues and Petition to Restrict

Concerns about Total Release Foggers (TRFs) were brought to EPA's attention from several sources.

- July 2008 EPA received a report involving TRFs human exposures investigated by the Washington State Department of Health (WADH):
  - 19 incidents over 2 years;
  - Recommended label improvements.
- October 2008, an article on TRF incidents appeared in the "Morbidity and Mortality Weekly Report" published by the Centers for Disease Control and Prevention (CDC):
  - 466 incidents, from 8 states over 6 years;
  - Recommended label improvements.
- March 2009, Assistant Commissioner, New York City Department of Health petitioned EPA to classify TRFs for restricted use;
  - Included NY City incident data on 344 incidents over 7 years.
  - Petition did not support label changes and made no recommendations.

EPA Analysis

- Risks assessments of pyrethrins and pyrethroids did not show risks of concern from normal use; over-use scenarios still have substantial margins of safety.
- EPA and national poison control center incident data showed:
  - Incidents are overwhelmingly minor in nature;
  - Incidents are not frequent in relation to TRF usage – range from 0.02 percent of sales involving minor incidents to 0.001 percent involving moderate and serious incidents.
  - Fire and explosion incidents are even rarer than exposure incidents.
- Analyses by WADH, CDC and the petition show that many incidents result from a few basic errors – failure to vacate premises, early reentry, failure to adequately ventilate/air out treated premises, and failure to warn others.

Conclusions/label changes

- Some incidents are attributable to poorly placed or unclear precautions: label improvements can mitigate these risks.
- EPA is calling for a set of specific label changes on TRF products: most were suggested by WADH and/or CDC, and some on EPA's initiative: The changes called for are:
  - Describe treatment area capacity in terms of ordinary room dimensions – width, length and ceiling height in feet, not cubic feet.

- Use pictograms to illustrate certain precautions (e.g., air out room, cover food, do not use multiple foggers, etc.).
- Stronger language on not using in confined spaces.
- Use large and/or bolded headings for each step in the directions for use.
- Prominent instruction to vacate immediately.
- Add "Breathing spray mist may be harmful."
- Add "Does not control bedbugs".
- Prominent "do not reenter for X hours" with a clock pictogram.
- Door hang-tag to inform others area has been treated.
- Include directions and precautions in Spanish as well as English.

Petition conclusion

- EPA concluded weight of evidence does not meet the criteria in FIFRA and its regulations for restricted use classification:
  - Risks do not appear widespread or serious from current use;
  - Risks can be further mitigated through label improvements;
  - There are benefits to low-cost residential pest control products.

Current Status:

- On March 24, EPA sent a letter to TRF registrants calling for the label changes listed above.
  - Response deadlines vary somewhat by chemical; some are due by June 30, others up to October 29, 2010.
  - Products in market should have new labels by September 2011.

- EPA will also continue to work with industry and recommend design and marketing changes, such as:
  - Avoiding multipacks of foggers for consumer use.
  - Adopting smaller unit sizes for TRFs (e.g., 2 oz. instead of 6 oz.)
  - Adopt short time-delay release mechanism.
  - Switch to non-flammable propellants.

- On March 24, EPA sent a letter denying the petition to reclassify TRFs for restricted use.

The letter to TRF registrants, the petition denial, and many supporting documents are available on EPA's pesticide program website.
http://epa.gov/oppfead1/cb/csb_page/updates/2010/new-foggers.html