



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

JUN - 2 2010

THE ADMINISTRATOR

The Honorable Ted Strickland
Governor of Ohio
77 South High Street
Columbus, Ohio 43215

Dear Governor Strickland:

Thank you for your letter of April 19, 2010, regarding the State of Ohio's emergency exemption request for the use of propoxur to control bed bugs. I want to assure you EPA is aware of the difficult challenges and distress facing those who are trying to combat the resurgence of this pest and we are taking many active steps towards potential solutions to this growing pest problem. I appreciate the opportunity to address your concerns.

EPA staff have reviewed Ohio's emergency exemption request for the pesticide active ingredient, propoxur. Although EPA recognizes the severe and urgent challenges that Ohio is facing from bed bugs, the results of the risk assessment do not support the necessary safety findings as required by the Food Quality Protection Act (FQPA) and the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). In particular, the requested use presents an unacceptable risk to children who might be exposed to propoxur in and around rooms treated for bed bugs. EPA is required to make a safety finding in support of newly requested pesticide uses, including those that are sought on an emergency basis, such as this use of propoxur on bed bugs. Propoxur, along with other members of its chemical class, is known to cause nervous system effects. The Agency's health review for its use on bed bugs suggests that children entering and using rooms that have been treated may be at risk of experiencing nervous system effects. The specific exposure scenarios that are of most concern involve inhalation risk and also hand-to-mouth behaviors on the part of children.

We are collaborating with experts and stakeholders nationwide to determine what other pesticides may be effective for bed bug control. The issue of resistance to bed bug control products is a national, and even international, concern. To help address this serious challenge, my staff has been communicating with pesticide regulatory authorities and industry experts throughout the United States to discern if there are new and effective registered products under development. As of this writing, an immediate solution has not been identified; however, we are continuing to engage the industry. Pesticides are an important element in an integrated bed bug control program, and EPA is open to new chemical control options that meet the safety findings of FIFRA and FQPA.

EPA continues to take a leadership role in bringing together many key leaders, both in the public and private sector to identify and develop solutions to the bed bug issue. The seriousness of bed bug problems prompted EPA to convene the National Bed Bug Summit in April 2009. The Summit was very well attended and provided a forum for open dialogue about solutions for

all stakeholders involved with bed bug issues, including many Federal and State agencies. Collaboration promises to be key to sustainable bed bug control efforts. EPA continues to be actively engaged with States, municipalities, and Federal agencies that are grappling with bed bug issues.

EPA is supporting research into techniques that can be used in an Integrated Pest Management (IPM) approach to bed bug control. IPM is an effective and environmentally sensitive approach to pest management that considers pest life cycles and relies on a combination of common-sense chemical and non-chemical solutions. EPA is supportive of stakeholders involved in bed bug issues who are studying non-chemical practices to control bed bugs. Some of these practices appear to have utility in homes and commercial settings (e.g., hotels and apartments), including the use of heat or cold to kill all life-stages of bed bugs and physical exclusion techniques to prevent bed bugs from entering areas where people reside and sleep (e.g., mattress encasements).

EPA is working with the Centers for Disease Control and Prevention, the Department of Housing and Urban Development (HUD), and the Department of Agriculture's Agricultural Research Service (ARS) to coordinate programs for IPM techniques to address bed bugs. Also, while not an immediate solution, ARS is currently evaluating for efficacy several dozen new compounds (both natural and synthetic) that may be effective against bed bugs. We understand from Dr. Peter J. Ashley of HUD's Office of Healthy Homes and Urban Development that HUD has conducted IPM training for the Cincinnati Metropolitan Housing Authority and that the Cincinnati Health Department was involved in the planning for the IPM training. Dr. Ashley can be reached at (202) 402-7595.

Regardless of the ultimate solution to this challenge, education and outreach are key components to bed bug control on a community-wide basis. EPA will be issuing a *Request for Proposal* in mid-June to make \$550K available in the form of grants to state and tribal agencies to be used in pilot projects to expand education and outreach. EPA also recently launched a web site devoted to bed bug issues that provides information on IPM techniques, current research efforts, links to educational materials developed by reputable sources, and other useful information that will be helpful for the public suffering from bed bug problems and professionals on the front lines of this battle. EPA's website can be found at: <http://epa.gov/pesticides/controlling/bedbugs.html>.

Again, thank you for your letter. We are committed to working with you to address this problem. If you have any further questions or concerns, please contact me or your staff may call Sarah Hospodor-Pallone, Deputy Associate Administrator for Intergovernmental Relations, at (202) 564-7178.

Sincerely,



Lisa P. Jackson