



# BEYOND PESTICIDES

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July 2, 2009

George S. Hawkins  
Director  
Department of the Environment  
District of Columbia  
51 N Street, NE 6th Floor  
Washington, DC 20002

Dear Mr. Hawkins:

We are writing to request that you take immediate emergency action to suspend the use of bug bombs, or total release foggers (TRF), in the District of Columbia until it can be determined that the residents of the District are adequately protected from these products. The July 1 residential explosion involving the use of a TRF illustrates how dangerous these pesticide products are to consumers, threatening the lives of children and families.

Total release foggers are pesticides that have caused numerous explosions, acute illnesses and even death due to exposures to toxic chemicals. Because the District cannot ensure label compliance with these products and with a small margin for consumer error, the current threat to future harm is just too great. This incident and the registration of pesticides under your authority raises serious concern about the District's reliance on a federal U.S. Environmental Protection Agency (EPA) pesticide registration process that has documented deficiencies, unrealistic label requirements, poor assumptions about user capabilities, lack of training, and inadequate understanding of dangers.

Together, this situation constitutes an unacceptable threat to the residents of the District of Columbia and presents an unreasonable potential adverse effect and an imminent hazard. As you know, the District has the authority to step in and issue a stop sale order on these products until it can determine that the residents of the District of Columbia are adequately protected. Given the availability of less and non-toxic alternatives for insect management in residences, this threat is unjustifiable, unnecessary, and unreasonable.

According to a Centers for Disease Control and Prevention (CDC) report entitled, "Illnesses and Injuries Related to Total Release Foggers - Eight States, 2001-2006," released in its *Morbidity and Mortality Weekly Report*, a total of 466 cases of acute, pesticide-related illness or injury were associated with exposure to total release foggers (TRF) between 2001 and 2006. The report states that "these illnesses or injuries often resulted from inability or

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failure to vacate before the TRF discharged, reentry into the treated space too soon after the TRF was discharged, excessive use of TRFs for the space being treated, and failure to notify others nearby.” (Centers for Disease Control and Prevention (CDC). “Illnesses and Injuries Related to Total Release Foggers- Eight States, 2001-2006.” *Morbidity and Mortality Weekly Report*. 57(41);1125-1129, 2008.)

The CDC findings also show that TRFs pose risks to bystanders and neighbors. Foggers are considered a cheap way to kill and prevent insects such as cockroaches, fleas, and other bugs from invading homes. They work using flammable aerosol propellants to release pesticide chemicals all at once to fumigate an area.

Aside from fire and explosive dangers, most foggers contain synthetic pyrethroids, such as permethrin, which are linked to cancer, endocrine disruption, respiratory problems, reproductive effects, neurotoxicity and other health and environmental issues. With a high incidence of illness, explosions and even death from the use of these products, their use must be suspended now and ultimately eliminated or highly restricted. Last October, the state of New York took a stand against these pesticide products and moved to classify them as a “restricted-use product”- meaning only licensed pesticide applicators, rather than the general public, will be able to obtain them.

EPA notes on its website <http://www.epa.gov/opp00001/factsheets/fogger.htm> that consumers should take precautions when using these products, including following label directions, not using more than necessary, keep away from ignition sources, properly ventilate treated area and notify neighbors and anyone that may enter the treated area. However, it is clear that these are not enough. This type of warning is insufficient, relies on complete understanding of the instructions and threat, does not provide information on safer methods for preventing and managing insect problems, and is ultimately unenforceable by the District of Columbia, given limited resources for public education, and training, as well as investigative and enforcement staff. The labels on these products have limited label use and hazard information, and there is limited information available for consumers to make informed decisions when buying pesticides and choosing less hazardous products. The labels are sometimes not clear to consumers, particularly vulnerable populations who now may not have the means or ability to realize a product’s hazards. EPA knows historically from its label improvement program that it has a difficult time getting people to read labels and its findings justify District action to protect its residents.

Additionally, instead of using toxic pesticide chemicals that may explode in homes, injuring residents and causing illness, consumers should be educated by the District on safer, least- toxic options available to manage household pests. With a sound integrated pest management (IPM) system, which utilizes a variety of methods and techniques,

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including management, biological and structural strategies, consumers can prevent and control a multitude of pest problems. At IPM's foundation is prevention of a pest problem; that is, resident education, maintaining proper sanitation practices, destroying pest shelters and breeding sites, sealing cracks and crevices, monitoring pests and utilizing least-toxic chemical options, (e.g. boric acid, diatomaceous earth), only as a last resort. IPM has been proven to be safe and effective for long-term pest management. A recent study found that IPM reduced pests by 75 percent after three months and by 88 percent after six months. For more information, visit Beyond Pesticides [www.beyondpesticides.org](http://www.beyondpesticides.org).

We request that the District act immediately to stop on an emergency basis the sale of TRFs (bug bombs) within the District of Columbia. Please consider this a formal petition to initiate the process for you to take expedited action.

We appreciate your attention to this urgent matter.

Sincerely,

Jay Feldman  
Executive Director

cc. The Honorable Yvette Alexander  
The Honorable Marion Barry  
The Honorable Muriel Bowser  
The Honorable Kwame R. Brown  
The Honorable Michael A. Brown  
The Honorable David Catania  
The Honorable Mary M. Cheh  
The Honorable Jack Evans  
The Honorable Jim Graham  
The Honorable Vincent C. Gray  
The Honorable Phil Mendelson  
The Honorable Harry Thomas, Jr.  
The Honorable Tommy Wells  
The Honorable Adrian M. Fenty