



PIRT Action Item: Identifying Problem Pesticide Labels

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History

- 2007 - WSDA presented EPA with DOH label issues for household foggers and aerosols.
- 2008 – WSDA followed up with EPA. EPA interested in specific problem labels.
- Current WSDA-DOH project: test new coding developed by DOH to identify problem labels.



DOH data review

2005-2006

DPP cases

Non-occupational

Formulations: foggers, aerosols, pressurized liquids

Results: 65 incidents, 69 people

Foggers – 19 incidents, 22 people

Aerosols – 46 incidents, 47 people

1. Posting or notification didn't occur.
2. People were exposed in the treated area during application.
3. Structure not adequately ventilated before allowing people to re-enter.
4. Early re-entry.
5. Required eye protection not worn.
6. Other required PPE not worn.
7. PPE in poor repair, not maintained, not worn correctly.
8. Spill or splash (not involving equipment failure)
9. Product not stored properly / within reach of children.
10. Decontamination not adequate or timely.
11. Misuse of a pesticide.
12. Other label violations identified.
13. No label violation identified but person still became exposed/ill.
14. Equipment failure.
15. Drift.
16. Applicator not properly trained and/or supervised.
17. Other.
18. Unknown.

Causal Factors (Pcodes)

Foggers ($n = 22$)

- Causal Factors identified:
 - Use instructions not followed (13)
 - Re-entry exposures (7)
 - Stored within reach of children (5)
 - fogger malfunction (3)
 - No label violation identified (3)
- Pesticide Products
 - Raid Concentrated Deep Reach Fogger (15/22)

Ideas for comments to EPA foggers

- Reduce package size (1 can/1000 cu ft)
- Add safety device to turn off fogger.
- Child proof activation button.
- Improve label language “ Leave the treated area” to “Leave the premises.”
- Make warning statements more prominent “breathing fogger can make you and your pets sick.” Add warning for sensitive subpopulations.
- Review of Raid conc. deep reach fogger

Aerosols, etc. ($n = 47$)

- No label violations identified (18)
- Use instructions not followed (13)
- Improper storage (11)
- Re-entry and/or ventilation issues (4)
- Equipment failure/accidents (3)

Ideas for comments to EPA aerosols

- Remove young children before spraying in a room.
- Warning about respiratory symptoms in sensitive individuals.

Next steps

- Barb to finish write-up of findings.
- Ann and Barb to review labels and draft comments to EPA
- Input or suggestions from PIRT panel ?

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