



WASHINGTON STATE PEST MANAGEMENT ASSOCIATION

9024 Wyatt Ct SE | Tumwater, WA 98501

www.WSPMA.com | smalone@wspma.com

February 8th, 2023

Mary Elissa Reaves, Ph.D.
Director, Pesticide Re-Evaluation Division
Office of Pesticide Programs
U.S. Environmental Protection Agency (EPA)
1200 Pennsylvania Ave., NW
Washington, DC 20460-001

Via electronic submission to www.regulations.gov

Re: Comments Regarding Proposed Interim Decisions for the Rodenticides: Docket EPA-HQ-OPP-2017-0750

Brodifacoum, Case Number 2755 | Bromadiolone, Case Number 2760 | Bromethalin, Case Number 2765 | Chlorophacinone, Case Number 2100 | Cholecalciferol, Case Number 7600 | Difenacoum, Case Number 7630 | Difethialone, Case Number 7603 | Diphacinone (and its sodium salt), Case Number 2205 | Strychnine, Case Number 3133 | Warfarin (and its sodium salt), Case Number 0011 | Zinc Phosphide, Case Number 0026

Dear Dr. Reaves,

Introduction

The Washington State Pest Management Association (WSPMA) is the only trade group representing the structural pest control industry in the state of Washington. We sincerely appreciate the opportunity to comment on the Environmental Protection Agency's Proposed Interim Decision for Rodenticides.

Founded in 1957, WSPMA serves nearly 165 member companies across the state. Our members strive to protect all Washingtonians from pests by ensuring public health and safety while preserving property through safe, effective pest management services. WSPMA also offers educational materials and opportunities to our members to promote the most effective and compliant workforce for our industry. WSPMA's member companies use anticoagulant rodenticide products to control mice and rats in countless commercial, residential, and institutional settings.



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Impacts of Restricted Use Pesticide (RUP) Status

Washington state experiences a prevalence of several species of rodents, each destroying or contaminating spaces including, single-family and multi-family dwellings, ports, food storage, processing, and retail facilities, hospitals, and schools. The most common rodent species are the Norway rat, the roof rat (commonly known as the black rat), and the house mouse. All three are non-native species to Washington.¹ These rodents commonly contaminate food supplies and storage through their waste and destroy electrical wires, building support structures, and even insulation.² Western Washington has become home to many pharmaceutical and Bio-Tech facilities that require a sterile environment and cannot operate with airborne contamination commonly caused by rodents. Several crops and other food related items are grown, made and/or processed in Washington State. Rodents can and do cause contamination of the food chain. If not addressed in a safe and swift manner, rodent problems will continue to raise public health concerns, spread diseases, and decimate Washingtonians' personal property. Rodenticides are an essential tool in rodent control because of the bacteria, viruses, and other disease-causing pathogens that rodents can transmit to humans. Rodents are known to transmit diseases like murine typhus and salmonellosis indirectly through their droppings, saliva, urine, as well as hosting fleas. According to the U.S. Centers for Disease Control and Prevention (CDC), rodents transmit over 35 diseases such as: hantavirus, rat bite fever, trichinosis, plague, infectious jaundice, Weil's disease, and leptospirosis.³ Leptospirosis results in an estimated 1.03 million annual cases and 58,900 deaths around the world.⁴ While the majority of deaths caused by leptospirosis occur in the developing world, the United States is not immune, as three people in New York City were infected in 2017, resulting in one death.⁵

In Washington state, our industry already works under heavily regulated oversight in accordance with the guidelines set by the EPA and our state Department of Agriculture. Giving a Restricted Use Pesticide (RUP) designation to rodenticides creates an unnecessary burden for pest management professionals and their customers. In Washington, the

¹ Living with wildlife: Rats. Washington Department of Fish & Wildlife. (2023). <https://wdfw.wa.gov/species-habitats/living/species-facts/rats#facts>

² Ibid.

³ "Rodents," Centers for Disease Control and Prevention, Centers for Disease Control and Prevention, www.cdc.gov/rodents/diseases/direct.html.

⁴ Costa, Federico et al., "Global Morbidity and Mortality of Leptospirosis: A Systematic Review" PLoS neglected tropical diseases vol. 9,9 e0003898, 17 Sep. 2015, doi:10.1371/journal.pntd.0003898

⁵ Sarah Larimer, "This Rare Disease Spreads through Contact with Rat Urine. In New York, It Has Left 1 Dead," The Washington Post, WP Company, 15 Feb. 2017, www.washingtonpost.com/news/toyourhealth/wp/2017/02/15/this-rare-disease-spreads-through-contact-with-rat-urine-in-new-york-it-has-left1dead/?utm_term=.8403bf117a4e.



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Department of Agriculture orders that “for non-forestry commercial applications, licensed applicators must be physically present and always within eye and earshot of the unlicensed person whenever the application occurs”.⁶ If rodenticides are designated as RUP status, the oversight requirement for all licensed applicators doing routine rodent services will add unnecessary time and require an additional EPA license for applications on federal tribal lands.

Additionally, designating rodenticides as RUPs will add strain to the compliance and workplace educational processes provided by state agencies in Washington. WSPMA is concerned that RUP status for rodenticides will lead to an influx of technicians seeking certification and licensure, stretching the capacity of an already overextended Department of Agriculture process, which lacks online capabilities and currently takes up to 8 weeks or longer. The lack of a streamlined exam and licensing process will push the costs to the consumers. This designation will also place an undue burden on the various public health authorities throughout the state due to increased rodent populations.

Impact of Additional Personal Protective Equipment (PPE)

Ensuring employee and customer safety is a top priority for pest management business owners. The pest control industry relies on the EPA to mandate appropriate personal protective equipment (PPE) to reduce or eliminate exposure that will result in unacceptable risks to applicators. However, it is also imperative that the PPE recommendations and risk assumptions are grounded in real world scenarios and in consultation with the professionals who conduct this work daily.

The Draft Human Health Risk Assessment for Registration Review of Anticoagulant Rodenticides (EPA-HQ-OPP-2015-0768-0043) concludes with the statements:

“Based upon the available hazard and toxicity profile, HED concludes that FGAR and SGAR pesticides are extremely acutely toxic by all routes of exposure. Labeled uses of these products should be modified, as needed, to assure that occupational dermal and inhalation exposures are limited to the extent possible. HED notes that many anticoagulant product labels indicate gloves among the PPE for occupational handlers, but respiratory protection is not indicated. Likewise, any non-occupational exposures should also be limited to the extent possible.”

⁶ Washington Pesticide Laws and Related Regulations Handbook. Washington Department of Agriculture Pesticide Management Division. (2019), pg. 3. <https://cms.agr.wa.gov/WSDAKentico/Documents/Pubs/079-PesticideLawsRulesHandoutBooklet.pdf>



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As acknowledged by the Agency in the paragraph prior to this statement, occupational exposure incidents are rare.

The statements above about the hazards and toxicity of rodenticides presents a concern as they're meant to kill rodent, but we would challenge the term "acutely toxic" when the applicator follows the label and the current PPE protocols are being followed these risks are extremely rare as the draft indicates. Furthermore, the risks of exposure to rodent borne diseases and allergens presents a much higher risk to public health and would likely affect the most vulnerable among us, as they'd likely be in a situation where they may not be able to afford rodent control services and resort backed into either living with rodents or attempting to clean up and control rodent infestations on their own.

In Washington state, we use gloves however, we do not use thick, 14-mil gloves as part of our rodent control services for several reasons. First, the sheer cost of these gloves will lead to less being purchased and the likelihood that some of the thicker gloves being reused over time instead of proper disposal. These gloves are at least four to five times the cost of existing gloves, which will also impact the service cost for customers. Next, the thickness of these gloves is better suited for services where live animals are involved, not for the application of baits and servicing of bait stations. Lastly, the lack of dexterity can also lead to more incidents of cross contamination, as our industry uses scanners, handheld devices, and paper to report our work in compliance of the law. These are used to access service orders, record the materials used, the location of applications, and the quantity for each application. Presently, the recording process is simple and effective with the 3-6 mil disposable gloves, but with the heavier, reusable 14-mil gloves, the technician will need to constantly take them off throughout the service to document the process.

Impact of Mandatory Carcass Search Requirements

The proposed mandatory carcass search for Zinc Phosphide products requires daily return visits and this will increase the cost of services and negatively impact both pest control companies and consumers. Industry professionals estimate the increase will be at least \$75 more for each service, which will result in a rise in the prices that the customers will have to take on and the less access to quality pest control in lower-income and at-risk communities. Typically, technicians complete 10-12 services a day and if they are required to complete these searches in addition to their normal workload it will create issues with quality control. Professionals predict that companies would resort to designating the carcass searches to one technician, which would require them to hire additional employees during an already existing labor shortage.



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We are concerned with the language around the carcass removals. As written, its ambiguity creates uncertainty of the liability of the pest management professional if the animal carcass either cannot be found or ends up on a different property. Additionally, the required and recommended, carcass search requirement will add additional burdens when assisting with the unhoused communities in our major cities by presenting further safety concerns when police escorts aren't available and carcass searches are required. Rodent activity has become a growing public health concern affecting entire communities. Both scenarios may affect our insurance prices, which we see as yet another unintended but certainly damaging consequence of the RUP designation.

Conclusion

Thank you for the opportunity to provide comments on the proposed interim decision on rodenticides. In conclusion, we urge the EPA to consider and implement this feedback to ensure that the structural pest management industry continues to have the flexibility needed to provide effective professional pest management services to protect public health, food, and property from pests. If you have questions, or for additional information, I can be reached via email randym@unitedpestsolutions.com

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Moffat".

Randy Moffat

President

Washington State Pest Management Association

Email: randym@unitedpestsolutions.com

Phone: (623) 512-9797