

# BioSpotVictims.org

September 30, 2009

Information Quality Guidelines Staff (Mail Code 2811R)  
U.S. EPA  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

RE: Meeting of the FIFRA Scientific Advisory Panel, October 6-9, 2009; Request for comments;  
Federal Register Vol. 74, No. 141, P. 36708, July 24, 2009; Docket No. EPA-HQ-OPP-2009-0516

Ladies & Gentlemen:

Thank you for the opportunity to comment on the EPA's Draft Technical Guidelines for the Standard Operating Procedures for Residential Pesticide Exposure Assessments.

On page 218 of the Draft Technical Guidelines, under Application Rate (AR) for pet treatments, it states:

“The pesticide label should be used to determine the amount of active ingredient used during each treatment. The maximum application rates allowed by labels are always considered in risk assessments. For pet pesticide formulations which specify application rate in relation to animal weight (i.e., collars and top-spots), a rate should be quantified for small, medium and large weight classifications as assigned by the Agency. The weight ranges are as follow [sic]:”

“Cats – Small (up to 5 lbs), Medium (6 to 12 lbs), Large (13 lbs and up).”

“Dogs – Small (up to 20 pounds), Medium (21 to 50 lbs) and Large (51 lbs and up).”

I believe there is a contradiction in the above statement. If the maximum application rate allowed by labels are always considered in risk assessments, the application rate for animals in the small and medium weight classifications should not be considered because the worst-case scenario, which the maximum application rate hopes to capture, only involves exposure to animals in the large weight classification.

By considering the application rate for animals in the small and medium weight classifications, the risk posed to toddlers from treated animals in the large weight classification is greatly underestimated. That should be a real concern because the most popular pet pesticide products are spot-on treatments, which are formulated for a range of animal weights. Some spot-on treatments for large dogs contain almost as much as active ingredient as spot-on products that are formulated for horses.

When people purchase spot-on treatments, they have a right to assume that it will not pose harm to their children or their pets – regardless of the weight of their children or their pets.

Sincerely,

James TerBush  
Website Administrator

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