

Franklin County Board of Health

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January 15, 2010

The Franklin County Board of Health strongly supports the Ohio Department of Agriculture's Section 18 Waiver Request to allow the use of propoxur for the treatment of bed bugs in residential buildings. Our health district comprises suburban Columbus Ohio, and during the last three years, we have observed a significant and rising, incidence of bed bugs throughout our community. We have infestations in schools, fire houses, apartment buildings and many other buildings.

The current treatment regime for bed bugs is largely unworkable and has caused many problems for the residents of Greater Columbus due to residents' financial limitations, pesticide misuse, and ongoing and repeated pesticide exposure due to pesticide resistance exhibited by bed bugs.

Further, in order to rid themselves of the bed bugs, people are discarding bedding and upholstered furniture, which is being collected by individuals for reuse or resale, thus spreading the infestations.

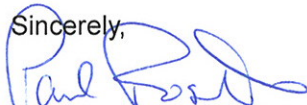
Cost: Current treatment technology requires multiple treatments at a significant cost to our residents. On average, eradication costs between \$800 - \$1,500. For many of our lower-income residents, this cost is far greater than they can afford, and many are resorting to other unsafe methods of treatment, including procuring farm, lawn care, and garden chemicals, to rid their home of the pests. Others have used untested herbal and chemical substances that may present a significant health hazard to them.

Compliance: Preparation for treatment is an extensive process. Many people are unable to do all of the work required for proper treatment, or they fail to do what is required of them after treatment.

Pesticide Resistance: We have observed instances in our area of bed bugs that appear to have developed widespread resistance to the pyrethroids that are available now. We have some buildings in Greater Columbus that have been treated multiple times, and the bed bugs have not been eradicated.

The Franklin County Board of Health strongly support the Ohio Department of Agriculture's Section 18 Waiver Request to allow the use of propoxur for the treatment of bed bugs in residential buildings.

Sincerely,



Paul Rosile, R.S. M.P.H.

Director of Environmental Health