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CHILD-RESISTANT PACKAGING REVIEW
Technical Review Branch

IN 08/09/99 OUT 08/10/99

Reviewed by Rosalind L. Gross 08/10/99

EPA Reg. No. or File Symbol 64240 - 34

DP Barcode D258466

EPA Petition or EUP No. _____

Date Division Received 07/08/99

Type Product(s) Insecticide

Data Accession No(s) 448683-01 (99-06) 448684-01 (99-05)

Product Mgr./Chemical Review Mgr./Contact Person PM 03 Division RD

Product Name(s) Combat Large Roach Bait F .03

Company Name(s) Combat Insect Control Systems

Submission Purpose Examine to ascertain if packaging is CRP

Active Ingredient(s), PC code, & % Fipronil

Summary of Findings

Neither study 99-06 nor study 99-05 can be used alone to support any CRP certification. However, the two studies, which are similar packages, are a pass of the child test according to the sequential test chart in 16 CFR 1700.20. The CRP certification dated 6/25/99 is acceptable based on 99-06 and 99-05.

MRID 448683-01 (99-06)

Station tested is 82.55 x 82.55 x 17.5 mm with holes 12.7 mm. The station is 30ml black HIPS base and 30 ml black HIPS lid index weld. **The station sold is not the same as the station tested. The station sold is debossed according to the certification whereas the one tested is not. Normally this discrepancy would require retesting. This study cannot be used alone to support any CRP certification.** Since package 99-05 was a similar package and it is debossed this study will be acceptable based on both 99-05 and 99-06. Station containing lipstick

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placebo mixture tested with children getting 48 stations (as 12 4-ups) at the beginning of the test. Failure was defined as evidence of lipstick indicator on the child or meeting a set of criteria agreed to by EPA and the registrant. A child failure was defined as access to more than eight individual bait stations. The results indicate a total of 0 children accessed one or more bait stations. There was one instance where the age was miscalculated, but stayed in the same age group, another where the test date was misentered. The station sold is debossed according to the certification whereas the one tested is not. **Normally this discrepancy would require retesting. This study cannot be used alone to support any CRP certification. Since package 99-05 was a similar package and it is debossed this study will be acceptable based on both 99-05 and 99-06.** There were no child failures. The study is a pass of the child test according to the sequential test chart in 16 CFR 1700.20. The CRP certification dated 6/25/99 is acceptable based on 99-06 and 99-05.

MRID 448684-01 (99-05)

Station tested is 82.55 x 82.55 x 17.5 mm with holes 12.7 mm. The station is 30ml black HIPS base and 30 ml black HIPS debossed lid index weld. The station sold is the same as the station tested. Station containing lipstick placebo mixture tested with children getting 8 stations (as 2 4-ups) at the beginning of the test. Failure was defined as evidence of lipstick indicator on the child or meeting a set of criteria agreed to by EPA and the registrant. A child failure was defined as access to more than eight individual bait stations. The results indicate a total of 1 child accessed one bait stations. There were no child failures. **While no child accessed more than eight individual bait stations, no child was given enough bait stations (at least 9 bait stations) to ascertain whether or not a failure occurred. This study cannot be used alone to support any CRP certification.** However, the study along with 99-06, which is a similar package, is a pass of the child test according to the sequential test chart in 16 CFR 1700.20. The CRP certification dated 6/25/99 is acceptable based on 99-06 and 99-05.

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