



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND
TOXIC SUBSTANCES

July 11, 2001

NOTE TO PM 03 Ann Sibold

SUBJECT: Notification of Resin Change and Compliance with Child-Resistant Packaging Regulations EPA FILE NO: 64248-1, 64248-2, 64248-3, 64248-10, 64248-11, 64248-12, 64248-15

Please note that a **change in the resin** is effectively a **change in the Child-Resistant Packaging (CRP)** for the product, which must be an **amendment** not a notification. The registrant should be advised that an amendment and a new CRP certification should be submitted for each of these products EPA FILE NO: 64248-1, 64248-2, 64248-3, 64248-10, 64248-11, 64248-12, 64248-15. Since the new resin DK13 has lower softening and heat deflection temperatures than KK38, the CRP certification should include a statement indicating that the lower temperature will not affect the child-resistance of the bait station in hot climates for the life of the product (e.g. the Arizona desert). The registrant should be informed that while this change in resin is being accomplished by self certification samples of the old and new resin along with the data supporting their equivalency must be retained for the life of the registration in accordance with the CRP regulations in 40 CFR Part 157.

Please place a copy of this note and the resin information in the registration jackets for each of the above named products. If you have any questions please contact me at (703)-308-7368.

Rosalind L. Gross
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