



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

OFFICE OF
PREVENTION, PESTICIDES
AND
TOXIC SUBSTANCES

April 14, 2000

NOTE TO PM 03 Ann Sibold

SUBJECT: Certification to Compliance with Child-Resistant Packaging Regulations
EPA FILE NO: 64240-33

Please note the child-resistant packaging (CRP) certification sent for EPA FILE NO:64240-33 is based on the bracketing of three CRP studies (98-079, 99-03, and 98-071), which have been previously reviewed and **are acceptable in combination**. The three CRP studies cited 98-079, 99-03, and 98-071 must be used in combination because 98-071 was a marginal study and could only be used as a stand alone for the situation tested. Bracketing is permitted because 98-079, 99-03 were acceptable studies.

The CRP certification for EPA FILE NO:64240-33 **is acceptable** regarding compliance with the standards of 40 CFR 157.32 including the revised effectiveness standards in 16 CFR 1700.15(b), and the revised testing procedures in 16 CFR 1700.20 as published in 60 FR 37710 (July 21, 1995).

Please place a copy of this note and the CRP certification in the registration jacket for the above named product. Additionally please advise the registrant that this CRP certification is acceptable. If you have any questions please contact me at (703)-308-7368.

Rosalind L. Gross
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