CHILD-RESISTANT PACKAGING REVIEW Technical Review Branch

IN <u>12/03/98</u> <u>. OUT 05/14/99</u>
Reviewed by Rosalind L. Gross 5/14/99 Rosalind L. Gross
EPA Reg. No. or File Symbol 64248 -11
DP Barcode D251341
EPA Petition or EUP No
Date Division Received 10/06/98
Type Product(s) <u>Insecticide</u>
Data Accession No(s).446681-01 (98-082)
Product Mgr./Chemical Review Mgr/Contact Person PM 03 Division RD
Product Name(s) <u>Maxforce Roach Bait F.05</u>
Company Name(s) Maxforce Insect Control Systems
Submission Purpose Examine to ascertain if packaging is CRP
Active Ingredient(s), PC code, & % Fipronil

Summary of Findings

Station tested is 2.25" x 2.25" x 0.375" with holes 0.25". The station is 25ml black HIPS base and 30ml red K resin debossed lid index weld. The station sold is the same as the station tested. Station containing lipstick placebo mixture tested with children getting 72 single (not attached to each other) stations 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 data indicate two children (#29, a 45 month old male, and #43, a 51 month old female) gained access to one bait station each. The data on page 59 indicate that child #43, broke a bait station at the base of bait well, bit on a cracked corner and tore the bait station towards the well. On page 5 the set of criteria agreed to by EPA and the registrant indicates that "Any cracks, holes or other breaks that affect rectangular bait well zone in Diagram One August 17, 1998." are a station failure. While two children and not one child (as noted in the summary and electronic data) accessed one bait station, no children accessed more than eight individual bait stations. 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 10/5/98 is acceptable.