

CHILD-RESISTANT PACKAGING REVIEW

Technical Review Branch

IN 02/18/98 OUT 04/17/98

Reviewed by Rosalind L. Gross *RLL* 04/17/98

EPA Reg. No. or File Symbol 64240-33 and 9 related EPA Reg No.

DP Barcode D243277

EPA Petition or EUP No. _____

Date Division Received _____

Type Product(s) Insecticide

Data Accession No(s) 443021-01, etc.

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

Product Name(s) _____

Company Name(s) _____

Submission Purpose Examine to ascertain if packaging is CRP

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

Summary of Findings

See attached chart for multiple products and reviews

FIPRONIL

Fipronil has an acute dietary NOEL of 0.5mg/kg for neurotoxicity (memorandum S.Diwan;R.Keigwin 6/25/96)
 A failure for fipronil is access to 5.7mg of fipronil.¹ A worst case scenario is assumed when the number of stations per retail package or the amount of bait per station varies for the same EPA REG #.

EPA REG #	MRID	GLM#	PKG ID	# STAT /PKG	#STAT TEST WITH CHILD	# G BAIT/ STAT	% AI	AMT AI/ STAT MG	AMT AI/ PKG MG	FAIL = 5.7MG AI = # STATION ¹
64240-32	444652-01	15619A	UNIVERSAL BAIT STATION 97-121	12	1	1	0.05	0.5	6	11 (11.4)
64240-32	444652-02	15620A	UNIVERSAL BAIT STATION 97-122	12	12	1	0.05	0.5	6	11 (11.4)
64248-12	443881-01	15419A	97-072	48	48	2.75	0.03	0.825	39.6	7 (6.9)
64240-34	443881-01	15419A	97-072		48	2.75, 1.75	.03	0.825, 0.525		
64240-30	443875-01	15463A	97-091A [F1995.0244 WEATHERED ANT STAKE 18 COUNT]	18	18	1.5 (per label)	.01	0.15	2.7	38
64240-3 hydra - methylnon	443875-01	15463A	97-091A	18	18	1.5	1	15 hydra - methyl- non	270 hydra - methyl- non	FAIL=9120 MG hydra - methylnon = 608

¹5.7mg = 0.5mg/kg times 11.4kg , which is the NOEL for acute neurotoxicity times the weight of a 25 lb child.

EPA REG #	MRID	GLM#	PKG ID	# STAT /PKG	#STAT TEST WITH CHILD	# G BAIT/ STAT	% AI	AMT AI/ STAT MG	AMT AI/ PKG MG	FAIL = 5.7MG AI = # STATION¹
64240-GT	443251-01	15040A	97-007A	6,12, 18	12	1.5	.001	.015	.09, .18, .27	380
64240-33	443021-01	15218A	97-046	12, 24(2 boxes)	24	1.4 (tested 1.5 g)	0.03	0.42 (test 0.45)	5.04, 10.08 (test 10.8)	14 (13.6) [test 13 (12.7)]
64248-RA	443021-01	15218A	97-046	2, 3	24	0.04 (1.5 table 3)	1.00	0.4 (15)	0.8, 1.2 (30, 45)	15 (14.25) [1 (0.38)]
64240-UN	443021-01	15218A	97-046	12, 24	24	0.04 (contact, 1.4 (bait))	1.00 (cont act), 0.03 (bait)	0.4 (contact), 0.42 (bait) = 0.82 per station	9.84, 19.68	7 (6.95)
64240-30	443021-01	15218A	97-046	3, 6, 12 (table 1 + 3)	24	1.4	0.01	0.14	0.42, 0.84, 1.68	41 (40.7)
64248-11	443021-01	15218A	97-046	72	24	1.5	0.05	.75	54	8 (7.6)
64248-RI	443021-01	15218A	97-046	8	24	0.04 (contact, 1.5 (bait))	1.00 (cont act), 0.03 (bait)	0.4 (contact), 0.45 (bait) = 0.85 per station	6.8	7 (6.7)

EPA REG #	MRID	GLM#	PKG ID	# STAT /PKG	#STAT TEST WITH CHILD	# G BAIT/ STAT	% AI	AMT AI/ STAT MG	AMT AI/ PKG MG	FAIL = 5.7MG AI = # STATION'
64248-RI	443021-01	15218A	97-046	72	24	0.04 (contact), 1.5 (bait)	1.00 (cont act), 0.03 (bait)	0.4 (contact), 0.45 (bait) = 0.85 per station	61.2	7 (6.7)
64248-10	443021-01	15218A	97-046	24	24	1.5	0.01	0.15	3.6	38
64240-GT	443021-01	15218A	97-046	6, 12, 18	24	1.5	.001	0.015	.09, .18, .27	380
64240-GI	443021-01	15218A	97-046	2, 3	24	0.04	1.00	0.4	0.8, 1.2	15 (14.25)
64248-RI	441357-01	14358A	96-075A	8, 72	12	0.04 (contact), 1.5 (bait)	1.00 (cont act), 0.03 (bait)	0.4 (contact), 0.45 (bait) = 0.85 per station	6.8, 61.2	7 (6.7)
64248-RA	441357-01	14358A	96-075A	2, 3	12	0.04 (1.5 table 3)	1.00	0.4 (15)	0.8, 1.2 (30, 45)	15 (14.25) [1 (0.38)]

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EPA REG #	MRID	GLM#	PKG ID	PKG DESCRIPTION INCL THICKNESS	COMPANY DATA
64240-32	444652-01	15619A	UNIVERSAL BAIT STATION 97-121	Package tested is 5.8cmx5.8cmx1.2cm. The station is black 30ml HIPS base, red 30ml K resin lid, index weld. Station tested individually with children.	The station is black 30ml HIPS base, red 30ml K resin lid, index weld. Station containing lipstick placebo mixture tested with children receiving only one station. Children did not receive another station regardless of whether or not station was accessed. Results indicate two children accessed 1 station each and a third child (pkg 6) chewed off pieces of black plastic, but station was not considered accessed.
64240-32	444652-02	15620A	UNIVERSAL BAIT STATION 97-122	Package tested is 5.8cmx5.8cmx1.2cm. The station is black 30ml HIPS base, black 25ml HIPS lid, index weld. Station attached to each other.	The station is black 30ml HIPS base, black 25ml HIPS lid, index weld. Station attached to each other. Station containing lipstick placebo mixture tested with children receiving 12 stations at the start of the test. Results indicate 5 children accessed at least one bait station, one child accessed two bait stations. Additionally, the data indicate that a number of children (pkg 6, 24, 50, 46, 23, 31) cracked the station or product fell out, but these instances were not considered access to the bait station.
64248-12	443881-01	15419A	97-072	Package tested is 8.2cmx8.2cmx1.7cm. The station is black 40ml HIPS base, black 40ml HIPS lid, improved smear weld.	The station is black 40ml HIPS base, black 40ml HIPS lid, improved smear weld. Children were each given 12 4-ups (48 stations). Results indicate 2 children accessed one bait station each and a third child (pkg 29) tore plastic, but station was not considered accessed.

EPA REG #	MRID	GLM#	PKG ID	PKG DESCRIPTION INCL THICKNESS	COMPANY DATA
64240-34	443881-01	15419A	97-072	Package tested is 8.2cmx8.2cmx1.7cm. The station tested is black 40ml HIPS base, black 40ml HIPS lid, improved smear weld.	The station tested is black 40ml HIPS base, black 40ml HIPS lid, improved smear weld. Children were each given 12 4-ups (48 stations). Results indicate 2 children accessed one bait station each and a third child (pkg 29) tore plastic, but station was not considered accessed.
64240-30	443875-01	15463A	97-091A [F1995.0244 WEATHERED ANT STAKE 18 COUNT]	Package tested is 5.7cmx5.7cmx1cm. The station is weathered 6 weeks in AZ, grey 25ml HIPS base and black 25ml HIPS lid, index welded. Black ant stake is involved.	The station is weathered 6 weeks in AZ, grey 25ml HIPS base and black 25ml HIPS lid, index welded. Ant stake is involved. Each child was given 3 6-ups and 18 stakes at the beginning of the test. Three children accessed one bait station by breaking pieces of the top off during the second 5 minutes test period. The report states "The tester made the determination that the child could possibly have accessed the material...." There were an additional 37 instances where the child was reported to have broken off some of the plastic or a corner of the bait station, but these cases were not considered accessing the station.
64240-3 hydra - methylnon	443875-01	15463A	97-091A [F1995.0244 WEATHERED ANT STAKE 18 COUNT]	A description of the package to be sold is not given as no plans to market 64240-3 with this station in near culture.	The station tested was a weathered 6 weeks in AZ, grey 25ml HIPS base and black 25ml HIPS lid, index welded. Ant stake is involved. For further details see review under EPA Reg. # 64240-30

EPA REG #	MRID	GLM#	PKG ID	PKG DESCRIPTION INCL THICKNESS	COMPANY DATA
64240-GT	443251-01	15040A	97-007A	STATION TESTED: 30ml HIPS green lid, 25ml HIPS black base, smear weld. Original retail package of station tested: contains green lid & black base with green "L" shape stake (7.5 cm long 4.5 cm on top & 0.5cm diameter); station 5.2cm x 5.2 cm x 1.0 cm high with 0.7cm diameter hole for stake, and 4 holes 0.7cm wide for insect to access bait. Station intended for sale is unknown	Weathered station (3 months per ASTM G7-89) tested by give child 12 stations (2 6-ups) at beginning of test with 12 stakes. Initially, written report was not submitted for this study. After review was done written report was submitted and examined. The written report indicated that 4 children accessed ≥one bait station (2 before & 2 after demonstration). 2 children opened one bait station & 2 children opened two bait stations. There were a number of additional children (pkg 19, 20, 6, 28, 3) that broke off pieces of the bait station or poked holes in it, but these instances were not considered access to the bait station.

EPA REG #	MRID	GLM#	PKG ID	PKG DESCRIPTION INCL THICKNESS	COMPANY DATA
64240-33	443021-01	15218A	97-046	Package tested is 5.7cm x 5.7cm x 1cm. The station is 25ml black HIPS base, 25ml black HIPS lid, index weld, "easy break", 3 prong base, not weathered. Station given as 24 singles at begin test to child.	The station is 25ml black HIPS base, 25ml black HIPS lid, index weld, "easy break", 3 prong base, not weathered. Station containing lipstick placebo mixture tested with children getting 24 stations as singles (not attached to frame or each other) at begin test. Note when sold stations are attached to each other. Failure was defined "as gaining access to the contents of a bait station. The presence of the red indicator on a child's hands was used to help determine access." Results indicate none of the children were able to access the contents of bait stations. Additionally, the data indicate 8 children (10, 14, 4, 5, 22, 32, 27, 33) bit or broke off pieces of the bait station, smashed the bait station, cracked the bait station, lifted the edge of the bait station, but these instances were not considered access to the bait station.
64248-RA	443021-01	15218A	97-046	Package tested is 5.7cm x 5.7cm x 1cm. The station is 25ml black HIPS base, 25ml black HIPS lid, index weld. The station to be sold differs from the one tested in that it has 30 ml red K resin lid.	The product is a viscous liquid applied to the upper inner lid of station.

EPA REG #	MRID	GLM#	PKG ID	PKG DESCRIPTION INCL THICKNESS	COMPANY DATA
64240-UN	443021-01	15218A	97-046	Package tested is 5.7cm x 5.7cm x 1cm. The station is 25ml black HIPS base, 25ml black HIPS lid, index weld. The station to be sold is identical to the station tested.	The product is a viscous liquid applied to the upper inner lid of station and a bait portion purportedly similar to the bait in study GLM 15218A.
64240-30	443021-01	15218A	97-046	Package tested is 5.7cm x 5.7cm x 1cm. The station is 25ml black HIPS base, 25ml black HIPS lid, index weld. The station to be sold differs from the one tested in that it has a grey base.	The station to be sold differs from the one tested in that it has a grey base. It should not involve an ant stake based on table 1.
64248-11	443021-01	15218A	97-046	Package tested is 5.7cm x 5.7cm x 1cm. The station is 25ml black HIPS base, 25ml black HIPS lid, index weld. The station to be sold differs from the one tested in that it has a red lid.	The station to be sold differs from the one tested in that it has a red lid.
64248-RI	443021-01	15218A	97-046	Package tested is 5.7cm x 5.7cm x 1cm. The station is 25ml black HIPS base, 25ml black HIPS lid, index weld. The station to be sold differs from the one tested in that it has 30 ml red K resin lid.	The product is a viscous liquid applied to the upper inner lid of station and a bait portion purportedly similar to the bait in study GLM 15218A.

EPA REG #	MRID	GLM#	PKG ID	PKG DESCRIPTION INCL THICKNESS	COMPANY DATA
64248-RI	443021-01	15218A	97-046	Package tested is 5.7cm x 5.7cm x 1cm. The station is 25ml black HIPS base, 25ml black HIPS lid, index weld. The station to be sold differs from the one tested in that it has 30 ml red K resin lid and is 5.3cm x 5.3cm x 1.1cm.	The product is a viscous liquid applied to the upper inner lid of station and a bait portion purportedly similar to the bait in study GLM 15218A.
64248-10	443021-01	15218A	97-046	Package tested is 5.7cm x 5.7cm x 1cm. The station is 25ml black HIPS base, 25ml black HIPS lid, index weld. The station to be sold differs from the one tested in that it has a red lid and a grey base.	The station to be sold differs from the one tested in that it has a red lid and a grey base
64240-GT	443021-01	15218A	97-046	Package tested is 5.7cm x 5.7cm x 1cm. The station is 25ml black HIPS base, 25ml black HIPS lid, index weld. The properties of the station to be sold are unknown.	The properties of the station to be sold are unknown. This station does not involve a stake per table 1.
64240-GI	443021-01	15218A	97-046	Package tested is 5.7cm x 5.7cm x 1cm. The station is 25ml black HIPS base, 25ml black HIPS lid, index weld. The station to be sold differs from the one tested in size, it is 5.2 cm x 5.2 cm x 1.1 cm.	The product is a viscous liquid applied to the upper inner lid of the station.

EPA REG #	MRID	GLM#	PKG ID	PKG DESCRIPTION INCL THICKNESS	COMPANY DATA
64248-RI	441357-01	14358A	96-075A	Package tested is 5.3cm x 5.3cm x 1.1cm. The station is 25ml black HIPS base, 30ml red K resin lid, smear weld. The station to be sold differs from the one tested in that it is index welded.	The children were given 2 6-ups at the beginning of the test. One child opened 4 stations and one child opened one station. For further information see the review for GLM 14358A. The product is a viscous liquid applied to the upper inner lid of station and a bait portion purportedly similar to the bait in study GLM 14358A.
64248-RA	441357-01	14358A	96-075A	Package tested is 5.3cm x 5.3cm x 1.1cm. The station is 25ml black HIPS base, 30ml red K resin lid, smear weld. The station to be sold differs from the one tested in that it is index welded.	The children were given 2 6-ups at the beginning of the test. One child opened 4 stations and one child opened one station. For further information see the review for GLM 14358A. The product is a viscous liquid applied to the upper inner lid of station.

FIPRONIL

EPA REG #	MRID	GLM#	PKG ID	CRP CERT ²	CONCLUSIONS
64240-32	444652-01	15619A	UNIVERSAL BAIT STATION 97-121		The station is black 30ml HIPS base, red 30ml K resin lid, index weld. Station containing lipstick placebo mixture tested with children receiving only one station. Children did not receive another station regardless of whether or not station was accessed. Results indicate two children accessed 1 station each and a third child (pkg 6) chewed off pieces of black plastic, but the station was not considered accessed. A definition of access needs to include any access to bait (e.g. expose bait, touch bait, suck bait, crack station, ripping the station, putting a hole in it, bait fall out, poking the bait out, etc.). The CRP test for this bait station needs to address all of these possibilities. This study did not follow the prescribed procedures for testing bait stations as described in 16 CFR 1700.20 and clarified in PR Notice 97-9. Furthermore, a review of discussions with the registrant indicated that no alternative testing scheme with a test such as this one was considered. Additionally, one tester exceeded 30% of the children tested. Therefore, no conclusions may be drawn from the data. This study may not be used as a stand alone and may not be used in any bridging of data.

EPA REG #	MRID	GLM#	PKG ID	CRP CERT ²	CONCLUSIONS
64240-32	444652-02	15620A	UNIVERSAL BAIT STATION 97-122	4/2/98	The 8/4/97 CRP certification based on GLM 15218A is unacceptable (per PR97-9) and replaced by 4/2/98 certification. The station is black 30ml HIPS base, black 25ml HIPS lid, index weld. The stations are attached to each other. Stations containing lipstick placebo mixture were tested with children receiving 12 stations at the start of the test. Results indicate 5 children accessed at least one bait station, one child accessed two bait stations. Additionally, the data indicate that a number of children (pkg 6, 24, 50, 46, 23, 31) cracked the station or had product fall out of the station, but these instances were not considered access to the bait station. A definition of access needs to include any access to bait (e.g. expose bait, touch bait, suck bait, crack station, ripping the station, putting a hole in it, bait fall out, poking the bait out, etc.). The CRP test for this bait station needs to address all of these possibilities. Therefore, no conclusions could be drawn from the data. Since no conclusions could be drawn from the data, the 4/2/98 CRP certification is unacceptable.
64248-12	443881-01	15419A	97-072	1/8/98 & 9/24/97	The station is black 40ml HIPS base, black 40ml HIPS lid, improved smear weld. Children were each given 12 4-ups (48 stations). Results indicate 2 children accessed one bait station each and a third child (pkg 29) tore plastic, but station was not considered accessed. It is unclear as to whether stations were attached to each other or to plastic frame. This is a pass of the child test according to the sequential test chart in 16 CFR 1700.20. Although acceptable, registrant should be reminded that definition of access needs to include any access to bait (e.g. expose bait, touch bait, suck bait, crack station, ripping the station, putting a hole in it, bait fall out, poking the bait out, etc.). The CRP test needs to address all of these possibilities. Since study is a pass the CRP certifications are acceptable.

EPA REG #	MRID	GLM#	PKG ID	CRP CERT ²	CONCLUSIONS
64240-34	443881-01	15419A	97-072		The station tested is black 40ml HIPS base, black 40ml HIPS lid, improved smear weld. Results indicate 2 children accessed one bait station each and a third child (pkg 29) tore plastic, but station was not considered accessed. Registrant should be reminded that definition of access needs to include any access to bait (e.g. expose bait, touch bait, suck bait, crack station, ripping the station, putting a hole in it, bait fall out, poking the bait out, etc.). The CRP test needs to address all of these possibilities. This is a pass of the child test according to the sequential test chart in 16 CFR 1700.20. This study will only support the CRP certification for EPA Reg No 64240-34 if the station to be sold is the same number of bait stations per retail box, smear welded, the size, color, type plastic, plastic thickness, etc. are the same as the station tested. The CRP certification needs to identify station size, color, type plastic, plastic thickness, and type of welding to determine its acceptability.

EPA REG #	MRID	GLM#	PKG ID	CRP CERT ²	CONCLUSIONS
64240-30	443875-01	15463A	97-091A [F1995.0244 WEATHERED D ANT STAKE 18 COUNT]	9/25/97 (18 station)	The station is weathered 6 weeks in AZ, grey 25ml HIPS base and black 25ml HIPS lid, index welded. Ant stake is involved. Each child was given 3 6-ups and 18 stakes at the beginning of the test. Three children accessed one bait station by breaking pieces of the top off during the second 5 minutes test period. The report states "The tester made the determination that the child could possibly have accessed the material...." There were an additional 37 instances where the child was reported to have broken off some of the plastic or a corner of the bait station, but these cases were not considered accessing the station. A definition of access needs to include any access to bait (e.g. expose bait, touch bait, suck bait, crack station, ripping the station, putting a hole in it, bait fall out, poking the bait out, etc.). The CRP test for this bait station needs to address all of these possibilities. Therefore, no conclusions could be drawn from the data. Since no conclusions could be drawn from the data, the 9/25/97 CRP certification is unacceptable.
64240-3 hydra - methylnon	443875-01	15463A	97-091A [F1995.0244 WEATHERED D ANT STAKE 18 COUNT]	9/25/97 (18 station)	The study reviewed under EPA Reg. # 64240-30 but no conclusions could be drawn from the data. Since no conclusions could be drawn from the data, the 9/25/97 CRP certification is unacceptable. The CRP certification indicates no plans to market 64240-3 using this station.

EPA REG #	MRID	GLM#	PKG ID	CRP CERT ²	CONCLUSIONS
64240-GT	443251-01	15040A	97-007A	9/4/97	Weathered station (3 months per ASTM G7-89) tested by give child 12 stations (2 6-ups) at beginning of test with 12 stakes. Initially, written report was not submitted for this study. After review was done written report was submitted and examined. The written report indicated that 4 children accessed <u>one</u> bait station (2 before & 2 after demonstration). 2 children opened one bait station & 2 children opened two bait stations. This was determined to be a pass of the child test according to the sequential test chart in 16 CFR 1700.20. However, the written report revealed there were a number of additional children (pkg 19, 20, 6, 28, 3) that broke off pieces of the bait station or poked holes in it, but these instances were not considered access to the bait station. A definition of access needs to include any access to bait (e.g. expose bait, touch bait, suck bait, crack station, ripping the station, putting a hole in it, bait fall out, poking the bait out, etc.). The CRP test for this bait station needs to address all of these possibilities. Therefore, the study is <u>no longer considered a pass of the child test according to the sequential test chart in 16 CFR 1700.20</u>. At this time, no conclusions could be drawn from the data. Since no conclusions could be drawn from the data the 9/4/97 CRP certification is unacceptable. It should be noted as the study was originally done on a specific bait station as described herein, it will only support the CRP certification for EPA Reg No 64240-GT if the station to be sold is same number of bait stations per retail box, smear welded, the size, color, type plastic, plastic thickness, etc. are the same as the station tested. The CRP certification needs to identify station size, color, type plastic, plastic thickness, and type of welding to determine its acceptability.

EPA REG #	MRID	GLM#	PKG ID	CRP CERT ²	CONCLUSIONS
64240-33	443021-01	15218A	97-046	8/4/97 & 7/31/97	The station is 25ml black HIPS base, 25ml black HIPS lid, index weld, "easy break", 3 prong base, not weathered. Station containing lipstick placebo mixture tested with children getting 24 stations as singles (not attached to each other) at begin test. Failure was defined "as gaining access to the contents of a bait station. The presence of the red indicator on a child's hands was used to help determine access." Results indicate none of the children were able to access the contents of bait stations. Additionally, the data indicate 8 children (10, 14, 4, 5, 22, 32, 27, 33) bit or broke off pieces of the bait station, smashed the bait station, cracked the bait station, or lifted the edge of the bait station, but these instances were not considered access to the bait station. The fact that aforementioned 8 children did not pry off the bait station lid or have red on their hands is noted. However, it is unclear as to whether or not the bait was accessible in one or more of these instances. A definition of access needs to include any access to bait (e.g. expose bait, touch bait, suck bait, crack station, ripping the station, putting a hole in it, bait fall out, poking the bait out, etc.). The CRP test for this bait station needs to address all of these possibilities. Additionally, one tester exceeded 30 % of the children tested. Therefore, no conclusions could be drawn from the data. Since no conclusions could be drawn from the data, the 8/4/97 & 7/31/97 CRP certifications are unacceptable.

EPA REG #	MRID	GLM#	PKG ID	CRP CERT ²	CONCLUSIONS
64248-RA	443021-01	15218A	97-046	2/23/98	The station to be used is different than the station tested in that the lid is a different thickness, color, and type of plastic from the one tested. Additionally, the number of stations tested is different than the number of stations per package. The station to be used must be tested and the children should be given at least 9 bait stations to ascertain whether or not the package is CRP, based on 0.4 mg of Fipronil per station. It is recommended that samples of the placebo and the station with the placebo be submitted and discussed to agree on what constitutes a failure before testing is done. GLM 15218A can not be used for this CRP certification. Therefore the 2/23/98 CRP certification is unacceptable.
64240-UN	443021-01	15218A	97-046	2/14/98	GLM 15218A could be used to certify the 24 station size of this product. However, no conclusions could be drawn from the data in GLM 15218A. Therefore, the 2/14/98 CRP certification is unacceptable. It is recommended that samples of the placebo and the station with the placebo be submitted and discussed to agree on what constitutes a failure before testing or recertification is done.
64240-30	443021-01	15218A	97-046	7/31/97	The station to be used is different than the station tested in that it has a grey base. Additionally, the number of stations tested is different than the number of stations per package. GLM 15218A can not be used for this CRP certification. Therefore the 7/31/97CRP certification is unacceptable.
64248-11	443021-01	15218A	97-046	7/31/97	The station to be sold differs from the one tested in that it has a red lid. It is unclear whether the number of stations per package are 24 or 72. Even if GLM 15218A could be used to certify the 24 station size of this product no conclusions could be drawn from the data in GLM 15218A. Therefore, the 7/31/97 CRP certification is unacceptable.

EPA REG #	MRID	GLM#	PKG ID	CRP CERT ²	CONCLUSIONS
64248-RI	443021-01	15218A	97-046	2/23/98	The station to be used is different than the station tested in that the lid is a different thickness, color, and type of plastic from the one tested. Additionally, the number of stations tested is different than the number of stations per package. It is recommended that samples of the placebo and the station with the placebo be submitted and discussed to agree on what constitutes a failure before testing is done. GLM 15218A can not be used for this CRP certification. Therefore the 2/23/98 CRP certification is unacceptable.
64248-RI	443021-01	15218A	97-046	2/17/98	The station to be used is different than the station tested in that it is a different size, and the lid is a different thickness, color, and type of plastic from the one tested. Additionally, the number of stations tested is different than the number of stations per package. It is recommended that samples of the placebo and the station with the placebo be submitted and discussed to agree on what constitutes a failure before testing is done. GLM 15218A can not be used for this CRP certification. Therefore the 2/17/98 CRP certification is unacceptable.
64248-10	443021-01	15218A	97-046	7/31/97	GLM 15218A could be used to certify the 24 station size of this product if the color of the lid and base had been the same (assuming it is the indoor use involving no stake). However, no conclusions could be drawn from the data in GLM 15218A. Therefore the 7/31/97CRP certification is unacceptable.
64240-GT	443021-01	15218A	97-046	9/4/97	None of the properties of the station to be sold are known so a determination regarding the use of GLM 15218A for CRP certification can not be made. Additionally, the number of stations tested is different than the number of stations per package. The 9/4/97CRP certification is unacceptable.

EPA REG #	MRID	GLM#	PKG ID	CRP CERT ²	CONCLUSIONS
64240-GI	443021-01	15218A	97-046	2/14/98	The number of stations tested differs from the number of stations per package to be used. Additionally, the size of the station tested (per GLM 15218A) is different than the size of the station to be used (per the CRP certification). The station to be used must be tested and the children should be given at least 9 bait stations to ascertain whether or not the package is CRP, based on 0.4 mg of Fipronil per station. It is recommended that samples of the placebo and the station with the placebo be submitted and discussed to agree on what constitutes a failure before testing is done. GLM 15218A can not be used for this CRP certification. Therefore the 2/14/98 CRP certification is unacceptable.
64248-RI	441357-01	14358A	96-075A	2/14/98	The station to be used is different than the station tested in that it is index welded instead of smear welded. Additionally, the number of stations tested is different than the number of stations per package. GLM 14358A can not be used for this CRP certification. Therefore, the 2/14/98 CRP certification is unacceptable.
64248-RA	441357-01	14358A	96-075A	2/14/98	The station to be used is different than the station tested in that it is index welded instead of smear welded. Additionally, the number of stations tested is different than the number of stations per package. GLM 14358A can not be used for this CRP certification. Therefore, the 2/14/98 CRP certification is unacceptable.

1. If the # Station is more than 9, then according to 16 CFR 1700.20 access to 9 stations (more than 8) is a failure.

2. Child test only, new certifications required per PR 96-2 by 1/21/98.