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CHILD-RESISTANT PACKAGING REVIEW

Technical Review Branch

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

Reviewed by Rosalind L. Gross  04/17/98

EPA Reg. No. or File Symbol 64240-GT

DP Barcode _____

EPA Petition or EUP No. _____

Date Division Received _____

Type Product(s) Insecticide

Data Accession No(s) 443251-01

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

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 \geq one 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 no longer considered a pass of the child test according to the sequential test chart in 16 CFR 1700.20.**

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.

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