

CHILD-RESISTANT PACKAGING REVIEW

Technical Review Branch

IN 02/12/98 OUT 04/17/98

Reviewed by Rosalind L. Gross 04/17/98

EPA Reg. No. or File Symbol 64240-30

DP Barcode D243142

EPA Petition or EUP No. \_\_\_\_\_

Date Division Received \_\_\_\_\_

Type Product(s) Insecticide

Data Accession No(s) 443875-01

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**

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.