

CHILD-RESISTANT PACKAGING REVIEW

Technical Review Branch

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

Reviewed by Rosalind L. Gross 04/17/98

EPA Reg. No. or File Symbol 64240-32

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

Date Division Received 02/12/98

Type Product(s) Insecticide

Data Accession No(s) 444652-01

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

Product Name(s) Combat Gold

Company Name(s) Combat Insect Control Systems

Submission Purpose Examine to ascertain if packaging is CRP

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

**Summary of Findings**

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..