

CHILD-RESISTANT PACKAGING REVIEW

Technical Review Branch

IN 10/07/98 OUT 01/19/99Reviewed by Rosalind L. Gross *RL Gross* 01/19/99EPA Reg. No. or File Symbol 64240-33, 64248-11, 64248-10DP Barcode D250087

EPA Petition or EUP No. _____

Date Division Received _____

Type Product(s) InsecticideData Accession No(s) 446476-01, (GLM 15218A, 97-046)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 CRPActive Ingredient(s), PC code, & % Fipronil**Summary of Findings****EPA REG NO 64240-33**

Initially, the data indicated 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. Registrant amended report to clarify these comments. Clarification indicates that the cracks were around the weld for packages 10, 14, 5, 22, 32, and 27; packages 4 and 33 were not opened/torn. A reexamination of the other packages was also undertaken and indicates that the cracks were around the weld and other tears for packages 34, 47 (7 stations), and 45. Results indicate none of the children were able to access the contents of bait stations. One tester exceeded 30% of the children tested. Based on the clarification of

the bait station cracks and access to more than 8 stations is a failure the study is a pass of the child test according to the sequential test chart in 16 CFR 1700.20. The CRP Certification is acceptable.

EPA REG NO 64248-11

The station to be sold differs from the one tested in that it has a red lid and is sold as 72 singles. Based on the understanding that the label **limits the maximum number of stations to 24 in 1 residence** GLM 15218A could be used to support this CRP certification.

EPA REG NO 64248-10

The station to be sold differs from the one tested in that it has a red lid and grey base. GLM 15218A could be used to support this CRP certification.