

CHILD-RESISTANT PACKAGING REVIEW

Technical Review Branch

IN 10/07/98 OUT 01/19/99Reviewed by Rosalind L. Gross*R.L. Gross*
01/19/99EPA Reg. No. or File Symbol 64240-30DP Barcode D250158

EPA Petition or EUP No. _____

Date Division Received _____

Type Product(s) InsecticideData Accession No(s) 446477-01, (GLM 15463A, 97-091A)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 64240-30**

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 initially considered accessing the station.** Registrant amended report to redefine a failure as access to more than 8 bait stations. Additionally, based on a worst case scenario the aforementioned 37 instances where the child

was reported to have broken off some of the plastic or a corner of the bait station as well as one case (26) where the child tried to pry off bait station lid were counted as bait station failures. 41 out of 50 children accessed 1 bait station each. Based on the definition of failure as access to more than 8 stations the study is a pass of the child test according to the sequential test chart in 16 CFR 1700.20 despite 41 out of 50 children accessing 1 bait station each. The CRP certification is acceptable only for 97-091A where 18 stations were tested and 12 stations are sold, as there have been other 12 station studies for this EPA REG # 64240-30 (e.g. 97-007A, GLM 15040A, MRID 443251-01 despite different seal, size, thickness). The CRP certification is not acceptable for 98-078 and 98-077, which have not yet been reviewed and accepted.