

CHILD-RESISTANT PACKAGING REVIEW
Technical Review Branch

IN 09/11/2000 OUT September 21, 2000

Reviewed by Rosalind L. Gross *R. L. Gross* September 21, 2000

EPA Reg. No. or File Symbol 64240 - 32

DP Barcode D268892

EPA Petition or EUP No. _____

Date Division Received 09/11/2000

Type Product(s) Insecticide

Data Accession No(s). MRID (99-14) (Clorox sample 2000-122)

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 results of CRP test to see if the CRP certification is acceptable for this 18 station retail package with a 12 month in use claim

Active Ingredient(s), PC code, & % Fipronil 0.05%

Summary of Findings

The results of study 99-14 indicate a total 0 failures, but 1 child accessed one bait station. 4 children were eliminated from the test. The study is a pass of the child test according to the sequential test chart in 16 CFR 1700.20.

The CRP certification for 99-14 is acceptable for 12 month product life. CRP certification can be up to 16 month product life because package aged for 16 months according to p12 (p 3, 6, & CRP certification state 16.5 months). MRID 446590-01 & 447332-01 for study 98-071 is a pass of the child test according to the sequential test chart in 16 CFR 1700.20, because no child accessed more than eight individual bait stations needed for a child failure. The 98-071 study was **marginal** because there were numerous instances of 3-5 stations being cracked/torn per child. Since the package being used is the same as the package tested in could be used for a CRP certification of the package new.

Company Data

Station tested was a reuse of station originally as 99-03 per 8/29/00 Clorox meeting notes. Station tested is 5.72cm x 5.72cm x 1.07cm with holes 0.65cm. The station is 25ml black HIPS base and 25ml black HIPS debossed lid index weld. The station sold is the same as the station tested. Station containing lipstick placebo mixture tested with children getting 18 stations (as singles) at the beginning of the test. Failure was defined as evidence of lipstick indicator on the child or meeting a set of criteria agreed to by EPA and the registrant. A child failure was defined as access to more than eight individual bait stations. The results indicate a total 0 failures, but 1 child accessed one bait station. 4 children were eliminated from the test.

Discussion of Results and Conclusion

Station tested was a reuse of station originally as 99-03 per 8/29/00 Clorox meeting notes. The results of 99-03 indicate a total of 0 children accessed one or more bait stations. There were no child failures.

Station tested is 5.72cm x 5.72cm x 1.07cm with holes 0.65cm. The station is 25ml black HIPS base and 25ml black HIPS debossed lid index weld. The station sold is the same as the station tested. Station containing lipstick placebo mixture, which is still viable (per 8/29/00 Clorox meeting notes), tested with children getting 18 stations (as singles) at the beginning of the test. (Stations in retail package will be attached to each other.) Failure was defined as evidence of lipstick indicator on the child or meeting a set of criteria agreed to by EPA and the registrant. A child failure was defined as access to more than eight individual bait stations. The results indicate a total 0 failures, but 1 child accessed one bait station. 4 children were eliminated from the test. **The study is a pass of the child test according to the sequential test chart in 16 CFR 1700.20.**

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