CHILD-RESISTANT PACKAGING REVIEW
Technical Review Branch

IN 08/23/2000 OUT 08/24/2000

Reviewed by Rosalind L. Gross 08/24/2000

EPA Reg. No. or File Symbol 64240 - 32

DP Barcode _____

EPA Petition or EUP No. _____

Date Division Received 08/10/2000

Type Product(s) Insecticide

Data Accession No(s). _____

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 Weld strength test method and results for sample stations retained at factory 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

Adequate information has not been provided to support CRP for the life of the product. The data submitted indicate the weld strength for 12 months and new bait stations were the same. However, weld strength is only one indicator of child-resistance. The child-resistance is also a function of the plastic used, its thickness, flexibility strength, tear strength, tensile strength, and cross directional strength factors, bait station climate conditions during use, and the product formulation. No information was provided regarding force applied to the bait station in any direction other than the upward direction. The plastic flexing strength, tear strength, tensile strength in both machine and cross machine directions were not tested. These factors influence whether or not the bait station can be compromised. Furthermore, the conditions under which the 12 month old samples were retained and their comparability to use conditions were not discussed.

Company Data

An internal test method (46222.001-1) for testing bait station weld strength was submitted. The test method 46222.001-1 involved a Chatillon Digital Force gauge and an Instron tester. The registrant claimed the weld strength is the primary indicator of child-resistance. The weld strength of sample bait stations retained at the manufacturing plant for 12 months and new bait stations were tested using the Chatillon Digital Force gauge. The results of the test indicate the weld strength of both samples were the same.

Discussion of Results and Conclusion

An internal test method (46222.001-1) for testing bait station weld strength was submitted. The test method 46222.001-1 involved a Chatillon Digital Force gauge and an Instron tester. The test method 46222.001-1 involved three test procedures, which were:

1. A physical inspection of weld strength of select samples from a sheet of bait stations;

2. Chatillon Digital Force gauge test of weld strength for bait stations;

3. An Instron tester of weld strength for bait stations.

The test discussed sampling from each horn set, but a horn set is not defined. The registrant claimed the weld strength is the primary indicator of child-resistance. The weld strength of sample bait stations retained at the manufacturing plant for 12 months and new bait stations were tested using the Chatillon Digital Force gauge. The results of the test indicate the weld strength of both samples were the same.

Weld strength is one indicator of child-resistance but it is not the only indicator. The child-resistance is also a function of the plastic used, its thickness, flexibility strength, tear strength, tensile strength, and cross directional strength factors, bait station climate conditions during use, and the product formulation. No information was provided regarding force applied to the bait station in any direction other than the upward direction. The plastic flexing strength, tear strength, tensile strength in both machine and cross machine directions were not tested. These factors influence whether or not the bait station can be compromised. Furthermore, the conditions under which the 12 month old samples were retained and their comparability to use conditions were not discussed.

In conclusion adequate information has not been provided to support CRP for the life of the product.

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