



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND  
TOXIC SUBSTANCES

January 24, 2000

NOTE TO PM 03 Ann Sibold

SUBJECT: Certification to Compliance with Child-Resistant Packaging Regulations  
EPA FILE NO: 64248-12

Please note the child-resistant packaging (CRP) certification sent for EPA FILE NO:64248-12 is based on two CRP studies, which have been previously reviewed and **are acceptable in combination**. The two CRP studies cited Clorox 99-06 and 99-05 must be used in combination because:

The station sold is debossed according to the certification whereas the one tested in 99-06 is not. Normally this discrepancy would require retesting. Study 99-06 cannot be used alone to support any CRP certification. Since package 99-05 was a similar package and it is debossed this study will be acceptable based on both 99-05 and 99-06.

In study 99-05 no child was given enough bait stations (at least 9 bait stations) to ascertain whether or not a failure occurred. This study cannot be used alone to support any CRP certification. However, the study along with 99-06, which is a similar package, is a pass of the child test according to the sequential test chart in 16 CFR 1700.20.

The CRP certification for EPA FILE NO:64248-12 **is acceptable for both the 2.75 and 1.75 g sizes** regarding compliance with the standards of 40 CFR 157.32 including the revised effectiveness standards in 16 CFR 1700.15(b), and the revised testing procedures in 16 CFR 1700.20 as published in 60 FR 37710 (July 21, 1995).

Please place a copy of this note and the CRP certification in the registration jacket for the above named product. Additionally please advise the registrant that this CRP certification is acceptable. If you have any questions please contact me at (703)-308-7368.

*Rosalind L. Gross*  
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