

CHILD-RESISTANT PACKAGING REVIEW

Technical Review Branch

IN 09/24/98 & 01/11/99 (amended) OUT 01/25/99Reviewed by Rosalind L. Gross *Rosalind L. Gross*
01/25/99EPA Reg. No. or File Symbol 64240-30DP Barcode D249814 D252406

EPA Petition or EUP No. _____

Date Division Received _____

Type Product(s) InsecticideData Accession No(s) .446536-02, (GLM 16369A, 98-070) amended report MRID
447333-02Product 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 Based on Amended Report**

In conclusion, no child accessed 9 stations which is the amount needed for a child failure, the study is a pass of the child test according to the sequential test chart in 16 CFR 1700.20. The certification for 1/8/99 12 pack is acceptable for 98-070. Certification of the 6 pack based on 98-070 will be permitted, because technically a child should have received at least 9 stations in order to ascertain whether or not a failure occurred.

The station is 25ml beige HIPS base, 25ml beige HIPS lid, index weld, and flower print debossed on lid. Ramp height is ≤ 1 cm. Station containing lipstick placebo mixture tested with children getting 12 stations attached to one another at the beginning

of the test. Failure was defined as evidence of the lipstick indicator on the child or meeting a set of criteria agreed to by EPA and the registrant. The results indicate two children (1 and 33) each accessed one bait station. The results on page 44 indicates child 47 tore up the side of wall but not past weld on a station, but neither the raw data nor page 45 ever mention a child 47. It should be noted that while no access was achieved there were several instances where child tore one or more stations either during separation from each other or during testing. Since no child accessed 9 stations which is the amount needed for a child failure, the study is a pass of the child test according to the sequential test chart in 16 CFR 1700.20. The certification for 1/8/99 12 pack is acceptable for 98-070. Certification of the 6 pack based on 98-070 will be permitted, because technically a child should have received at least 9 stations in order to ascertain whether or not a failure occurred.