

CHILD-RESISTANT PACKAGING REVIEW
Technical Review Branch

IN 12/09/98

OUT May 27, 1999

Reviewed by Rosalind L. Gross

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May 27, 1999

EPA Reg. No. or File Symbol 64240 - 30

DP Barcode D251530

EPA Petition or EUP No. _____

Date Division Received 09/08/98

Type Product(s) Insecticide

Data Accession No(s). 446679-02 (98-078) 446679-01 (98-077)

Product Mgr./Chemical Review Mgr./Contact Person PM 03 Division RD

Product Name(s) Combat Ant Bait F1

Company Name(s) Combat Insect Control Systems

Submission Purpose Examine to ascertain if packaging is CRP

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

Summary of Findings

MRID 446679-02 (98-078)

Station tested is 2.25" x 2.25" x 0.375" with holes 0.25". The station is 25ml gray 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 12 stations (2 6-ups with stations attached to one another) 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 no children accessed any bait stations. The raw data on page 50 indicate child (35), a 48 month old male, cracked the bait well. On page 5 the set of criteria agreed to by EPA and the registrant indicates that "Any cracks, holes or other breaks that affect rectangular bait well zone in Diagram One August 17, 1998." are a station failure. While one child instead of no children (as noted in the summary and electronic data)

accessed one bait station, no children accessed more than eight individual bait stations. There were no child failures. The study is a pass of the child test according to the sequential test chart in 16 CFR 1700.20. The CRP certification dated January 8, 1999, which replaces the October 5, 1998 and September 4, 1998 certification is acceptable.

MRID 446679-01 (98-077)

Station tested is 2.25" x 2.25" x 0.375" with holes 0.25". The station is 25ml gray 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 6 stations (1 6-ups with stations attached to one another) 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 of 6 children accessed one or more bait stations. A 44 month old male (15) accessed two bait stations, a 46 month old female, a 48 month old female, a 49 month old male, and two 49 month old females (# 17, 25, 47, 36, 37) each accessed one bait station. **In conclusion, no child accessed more than eight individual bait stations, which means there were no child failures. However, technically a child should have received at least 9 stations in order to ascertain whether or not a failure occurred. The January 8, 1999 certification for the 6 pack will be accepted based on 98-078.** The CRP certification dated January 8, 1999 replaces the October 5, 1998 and September 4, 1998 certification.