

CHILD-RESISTANT PACKAGING REVIEW
Technical Review Branch

IN 01/31/00 OUT 02/04/00

Reviewed by Rosalind L. Gross *R.L. Gross* 02/04/00

EPA Reg. No. or File Symbol 64248 - 14

DP Barcode D262679

EPA Petition or EUP No. _____

Date Division Received 06/25/99

Type Product(s) Insecticide

Data Accession No(s). _____

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

Product Name(s) RBF 5

Company Name(s) Maxforce Insect Control Systems

Submission Purpose Examine to ascertain if CRP required and acceptable for
refillable bait station

Active Ingredient(s), PC code, & % Fipronil 0.01%

Summary of Findings

CRP is not required for the product **if the total amount Fipronil per package is below 28.5 mg, the label and marketing strategy clearly limit the product to PCO use for crack and crevice, or the label and marketing strategy clearly limit the product to PCO use in bait stations to less than 57 stations with the maximum amount of Fipronil per station 0.5mg.** These restrictions would limit the child exposure as estimated in the April 21, 1998 memorandum from Dr. Mark Dow to Susan Lewis. The current label pin punched 06/25/99 does not clearly indicate these restrictions.

CRP has been waived for PCO use of Fipronil Gel 0.01% based on the inclusion of bitrex, its use as crack and crevice, and the assumption a child would only ingest one swallow. These assumptions were based on an April 21, 1998 memorandum from Dr. Mark Dow to Susan Lewis.

Product is a Fipronil Gel for use in refillable bait station or B & G Patrol station in a number of areas including residential areas. The product label does not indicate any

limitation of product to PCO use, the total amount of Fipronil per container, and it does not limit use of the product to crack and crevice. Product use directions indicate a maximum of 5 g/station, 2 stations/side, 4 sides per residence, which is 4 mg of Fipronil (0.5mg Fipronil per station). The 4 mg of Fipronil is well below the toxic or harmful amount of 28.5 mg (2.5mg/kg x 11.4 kg). Based on a February 1, 2000 telephone conversation with Ms. Evelyn Lawson at Clorox the formulation has bitrex in it and per a June 1999 meeting with the Agency Clorox believes CRP is not required for this product.

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