

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 - 17

DP Barcode D262680

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) Maxforce ABF 5

Company Name(s) Maxforce Insect Control Systems

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

Active Ingredient(s), PC code, & % Fipronil 0.0005%

Summary of Findings

In conclusion, CRP is not required for the retail package or the refillable bait stations since the total amount Fipronil per package (5.45mg) and per residential area according to the label (5.8mg) is below 28.5 mg the toxic or harmful amount of Fipronil.

The question is should the retail package and/or the refillable bait stations be CRP. A liquid Fipronil product is packaged in 16 - 33 fl oz (500 -1000 ml) container for use in refillable bait station or B & G Patrol station in a number of areas including residential areas. The bait stations are for both indoor and outdoor use. Product use directions indicate a maximum of 133 ml/station, 2 stations/side, 4 sides per residence. Based on a February 1, 2000 telephone conversation with Ms. Evelyn Lawson at Clorox the Fipronil liquid formulation has a density of 1.09g/cc and per a June 1999 meeting with the Agency Clorox believes CRP is not required for this product.

The amount of Fipronil is 5.45 mg for the total package (1000ml x 1.09g/ml x 1000mg/g x 0.0005% Fipronil). The maximum amount per residence based on a worst

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case scenario is 5.8 mg of Fipronil, which is more than one package. The calculation is based on the label, which indicates a maximum 1064 ml (133 ml/station x 2 stations/side x 4 sides per residence). Therefore, the maximum amount is 1064ml x 1.09g/ml x 1000mg/g x 0.0005% Fipronil = 5.8mg. The 5.45 or 5.8 mg of Fipronil is well below the toxic or harmful amount of 28.5 mg (2.5mg/kg x 11.4 kg). In conclusion, CRP is not required for the retail package or the refillable bait stations.