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CHILD-RESISTANT PACKAGING REVIEW
Technical Review Branch

IN 05/24/2000 OUT 06/05/2000

Reviewed by Rosalind L. Gross 06/05/2000

EPA Reg. No. or File Symbol 64240 - 34

DP Barcode D266285

EPA Petition or EUP No. _____

Date Division Received 04/11/2000

Type Product(s) Insecticide

Data Accession No(s). _____

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

Product Name(s) Combat Large Roach Bait F .03

Company Name(s) Combat Insect Control Systems

Submission Purpose Examine change in CSF to ascertain if CRP Certifications are still valid

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

Summary of Findings

A worst case calculation was done based on the following assumptions: the percentage of Fipronil per bait station is present at the upper certified limit (0.043%); the maximum amount of bait per bait station is 2.75g (based on previous CRP certifications and CRP studies reviewed). The results of the worst case calculation are that the **amount of Fipronil per bait station would increase to 1.2 mg per bait station and a failure (28.5 mg Fipronil) would decrease to 24 bait stations.** A child failure is defined as access to a toxic or harmful amount or 9 bait stations, whichever number is lower. **In conclusion, the definition of a child failure would remain at 9 bait stations for CRP testing and the CRP certifications would remain acceptable.** The registrant should be advised that changes in the amount of active ingredient have the potential to alter the CRP status of the bait station.

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