

US EPA ARCHIVE DOCUMENT

CHILD-RESISTANT PACKAGING REVIEW

Technical Review Branch

IN 02/17/98 OUT 04/17/98

Reviewed by Rosalind L. Gross *RLL* 04/17/98

EPA Reg. No. or File Symbol 64240-32

DP Barcode D243232

EPA Petition or EUP No. _____

Date Division Received 02/12/98

Type Product(s) Insecticide

Data Accession No(s) 444652-02

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

Product Name(s) Combat Gold

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

The 8/4/97 CRP certification based on GLM 15218A is **unacceptable (per PR97-9) and replaced** by 4/2/98 certification. The station is black 30ml HIPS base, black 25ml HIPS lid, index weld. The stations are attached to each other. Stations containing lipstick placebo mixture were tested with children receiving 12 stations at the start of the test. Results indicate 5 children accessed at least one bait station, one child accessed two bait stations. Additionally, the data indicate that a number of children (pkg 6, 24, 50, 46, 23, 31) cracked the station or had product fall out of the station, but these instances were not considered access to the bait station. **A definition of access needs to include any access to bait (e.g. expose bait, touch bait, suck bait, crack station, ripping the station, putting a hole in it, bait fall out, poking the bait out, etc.).** The CRP test for this bait station needs to address all of these possibilities. Therefore, no conclusions could be drawn from the data. Since no conclusions could be drawn from the data, the 4/2/98 CRP certification is unacceptable.