

US EPA ARCHIVE DOCUMENT

CHILD-RESISTANT PACKAGING REVIEW

Technical Review Branch

IN 09/24/98 & 01/11/99 (amended) OUT 01/25/99

Reviewed by Rosalind L. Gross *Rosalind L. Gross* 01/25/99

EPA Reg. No. or File Symbol 64240-30

DP Barcode D249814 D252406

EPA Petition or EUP No. \_\_\_\_\_

Date Division Received \_\_\_\_\_

Type Product(s) Insecticide

Data Accession No(s) 446536-01, (GLM 16367A, 98-068) amended report MRID 447333-01

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

Product Name(s) \_\_\_\_\_

Company Name(s) \_\_\_\_\_

Submission Purpose Examine to ascertain if packaging is CRP

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

**Summary of Findings**

**EPA REG NO 64240-30 Based on Amended Report**

**In conclusion, while no child accessed 9 stations which is the amount need for a child failure, the study is Rejected because the quality of data is unacceptable.** CRP certification based on 98-068 is Rejected. Certification of the 6 pack based on 98-070 will be permitted, because technically a child should have received at least 9 stations in order to ascertain whether or not a failure occurred.

The station is 25ml beige HIPS base, 25ml beige HIPS lid, index weld, and flower print debossed on lid. Ramp height is  $\leq 1$ cm. Station containing lipstick placebo mixture tested with children getting 6 stations attached to one another at the beginning of the test. Failure was defined as evidence of the lipstick indicator on the child or

1/2

meeting a set of criteria agreed to by EPA and the registrant. The results submitted electronically, on pages 5-9, 21, and 47 indicate two children (51 and 52) each accessed one bait station. The results on pages 43-46 indicate three children (51, 52, and 41) accessed bait stations and that child 52 accessed 2 bait stations. child 41 and child 52 accessed the bait station by gaining access half way up the ramp. No access was reported for: child 12 gained access 0.5cm up the ramp of one station; child 9 ripped two bait stations up to the ramp; and child 33 ripped one bait station up to the ramp and made a hole in station with teeth, which was not clarified; and child 46 cracked the disk base, which was not clarified. Based on the data submitted at least 4 children (51,52, 41, and 12) accessed one or more bait stations. Child 12 gained access 0.5cm up the ramp of one station, which is  $\frac{1}{2}$  way up the ramp based on the dimensions of the station. Clarification for child 33 making a hole in station with teeth and child 46 cracked the disk base would have been helpful. **In conclusion, while no child accessed 9 stations which is the amount needed for a child failure, the study is Rejected because the quality of data is unacceptable.** The data is unacceptable based on too many discrepancies within the report and electronic data as noted above regarding whether certain children accessed stations and how many. Therefore the CRP certification based on 98-068 is Rejected. Certification of the 6 pack based on 98-070 will be permitted, because technically a child should have received at least 9 stations in order to ascertain whether or not a failure occurred.