

US EPA ARCHIVE DOCUMENT

CHILD-RESISTANT PACKAGING REVIEW
Technical Review Branch

IN 01/31/2000 OUT 02/07/2000

Reviewed by Rosalind L. Gross *R.L. Gross* 02/07/2000

EPA Reg. No. or File Symbol 64240 - 34
DP Barcode D262712
EPA Petition or EUP No. _____
Date Division Received 09/01/99
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 F03

Company Name(s) Combat Insect Control Systems

Submission Purpose Examine to ascertain CRP certification acceptable

Active Ingredient(s), PC code, & % Fipronil 0.03%

Summary of Findings

Please note the child-resistant packaging (CRP) certification sent for EPA FILE NO:64240-34 is based on two CRP studies, which have been previously reviewed and **are acceptable in combination**. The two CRP studies cited Clorox 99-06 and 99-05 must be used in combination because:

The station sold is debossed according to the certification whereas the one tested in 99-06 is not. Normally this discrepancy would require retesting. Study 99-06 cannot be used alone to support any CRP certification. Since package 99-05 was a similar package and it is debossed this study will be acceptable based on both 99-05 and 99-06.

In study 99-05 no child was given enough bait stations (at least 9 bait stations) to ascertain whether or not a failure occurred. This study cannot be used alone to support any CRP certification. However, the study along with 99-06, which is a similar package, is a pass of the child test according to the sequential test chart in 16 CFR 1700.20.

The CRP certification for EPA FILE NO:64240-34 is **acceptable for both the 2.75 and 1.75 g sizes** regarding compliance with the standards of 40 CFR 157.32 including the revised effectiveness standards in 16 CFR 1700.15(b), and the revised testing procedures in 16 CFR 1700.20 as published in 60 FR 37710 (July 21, 1995).

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1