OCT 2 2 1993

Mr. Mike Compton, Registration Manager C. J. Martin Company 606 West Main Street P.O. Box 631090 Macogdoches, TX 75963

Dear Mr. Compton:

Subject: PAPTIN'S COPPER BAIT 50

EPA Registration No. 299-212

Your Submissions Dated September 10, 1993

and October 10, 1993

We have reviewed your progress report dated September 10, 1993, for the period from June 10 to September 10, 1993. It is not clear to us whether the progress reported toward meeting Density and Storage Stability data requirements applies to this product or only to baits registered by the Animal and Plant Health Inspection Service (APHIS) of the U.S. Department of Agriculture. These data requirements are formulation-specific. Tests of one or two formulations cannot be used to represent the market. Your specific bait formulation must be tested.

The proposed revised labeling submitted for this product is acceptable except for problems with the "USE RESTRICTIONS" portion of the "DIRECTIONS FOR USE. On your final printed labels for this product, this section must be revised to read as indicated below.

USE RESTRICTIONS: This product may be used to control pocket gophers (Geomys spp., Thomomys spp., and Pappogeomys spp.) in manual, subterranean applications only in rangelands, pastures, croplands, and noncrop areas. Do not apply this product by use of a mechanical burrow builder. Do not apply this product above ground over agricultural crops or anywhere else.

Submit five (5) copies of the final printed labeling, revised as indicated above, before you release this product for shipment.

CONCURRENCES								
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DATE								
EPA Form 1320-1 (12-70)			TOUR COST				OFFICIAL FILE COPY	

BEST AVAILABLE CUPY

- STS

The proposed new name for this product (MARTIN'S GOPHER BAIT 50) is acceptable. The old name (MARTIN'S GOPHER BAIT 35) may not be used any longer as it refers to the old 0.35% Strychnine formulation and would be misleading if used for the new formulation.

The Confidential Statement of Formula (CSF) which you submitted on October 13, 1993, is acceptable and supersedes all CSFs previously accepted for this product. Your Storage Stability and Density studies must be run with the formulation described by this CSF.

Sincerely yours,

Robert A. Forrest Acting Product Manager 14 Insecticide—Rodenticide Branch Registration Division (7505C)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Convulsive Poison! Poisonous if swallowed. Do not breathe dust, Do not contaminate feed and foodstuffs. Keep away from children, pets and domestic animals. Wash thoroughly with soap and water after handling and before eating or smoking. Clean clothing should be used daily. Do not touch bait with bare hands. Wear gloves while handling bait.

This product is to be used only for subsoil application as directed.

STATEMENT OF PRACTICAL TREATMENT IF SWALLOWED: CALL A PHYSICIAN OR POISON CONTROL CENTER IMMEDIATELY. If less than ten (10) minutes have passed since the poison was taken, give 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Repeat until vomit fluid is clear. Have patient lie down in quiet, darkened room and keep warm and quiet. Do not induce vomiting or give anything by mouth to an unconscious person.

IF INHALED: Remove victim to fresh air. Apply artificial respiration if indicated.

IF ON SKIN: Remove contaminated clothing and wash affected areas with soap and water. IF IN EYES: Fluch eyes with plenty of water. Get medical attention if irritation persists.

NOTE TO PHYSICIAN

- A. Administer 100% Oxygen by positive pressure to provide as much pulmonary gas exchange as possible despite seizuros.
- B. Administer ANTICONVULSANT DRUGS intravenously to control convulsions.

CAUTION: It may be difficult or impossible to stop the seizure activity without stopping respiration. Be prepared to maintain pulmonary ventilation mechanically. Tracheotomy may be necessary if seizures are prolonged.

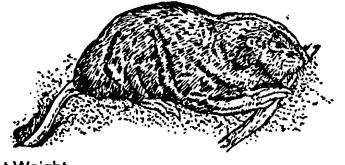
ENVIRONMENTAL HAZERDS

This product is tobic to fish, prids, and other wildlife. Baits exposed en soil surfaces may be hazardous to birds and other wildlife. Do not apply directly to lakes, streams, or ponds. Do not contaminate water കു-cleaning of equipment or disprisal of viastes.

ENDANGERED SPECIES-CONSIDERATIONS NOTICE: The killing of a member of an endangered species during strychnine baiting operations may result in a fine under the Endangered Species Act. Before baiting, the user is advised



STRYCHNINE TREATED GRAIN BAIT FOR SUBSOIL APPLICATION ONLY



Net Weight: 45 Pounds



ACTIVE INGREDIENT:

INERT INGREDIENTS:

Strychnine Alkaloid

KEEP OUT OF REACH COMMENTS **CHILDREN**

DANGER

OCT 22 19

ACCEPTED

See Antidote Statement and Other Warnings on Side P

50%

to contact the Re Service (Endange local Fish and Ga tion on endange should not be use the following spe and procedures California condor. Canada goose, marsh harvest n bear.

DIRE It is a violation of in a manner incon

USE RESTRICT only to control poproduct by use of BAITING: Rem side of the burrow by probing with Resistance on the are in the main ru bait into the burn died spoon if nec soil. Do not perm of bait will treat 1 number of acres t to above direction noticed.

STORAG STORAGE: Stor place. Store in a l dren, pets and a water, food or fee PESTICIDE DISF acutely hazardous pesticide, spray n of Federal Law. posed of by use contact your Sta Control Agency, o sentative at the n

guidance. **CONTAINER DIS** container. Comple sanitary landfill or state and local au litting out of smoke

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