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MAR -1 1993

Mr. Brent Hazen  
Fort Dodge Chemical, Inc.  
P.O. Box 2021  
Lompoc, CA 93438

Dear Mr. Hazen:

Subject: FORT DODGE MOLE BAIT  
EPA Registration No. 322-6  
Your Letters Dated December 10, 1992

The Agency has reviewed the submissions referred to above and has the following comments:

1. We have examined the protocol for the field efficacy trials of this product with eastern moles. The method seems to be basically appropriate for assessing the effectiveness of a single bait concentration with one species. Specific comments on the method, including some prescribed changes, are listed below.
  - a. Both your contractor and our staff feel that applying bait at 8-10" intervals in runways would constitute an excessive treatment rate, if the baits were attractive to moles, and one which would prove rather costly to users. Keeping in mind that the rate used in your field trials will be prescribed on the product's label, we suggest that you explore the use of less intense baiting for the efficacy study.
  - b. We suggest that pretreatment activity censusing conclude at least one day before the day of treatment to permit moles to recover from any effects that disturbance of their tunnels might have on their foraging behavior. Posttreatment activity censusing should be initiated one day after treatment. Intervals between burrow system disturbance and checking for repair by moles may be extended from 24 hours to 48 hours if your contractor feels that such an extension would improve the study. The interval used must be uniform throughout the study.

It might be a good idea to run a second posttreatment census period several days after the conclusion of the first to determine whether there are any delayed effects of treatment. If the effects of the treatment

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

appear to be rather poor, a second baiting period could be incorporated into the testing program. If the second treatment did not appear to be successful, it would be highly likely that the moles were not attracted (or had become adverse) to the bait.

- c. We suggest that you use mole-infested areas apart from those used for the primary efficacy study for work with radio telemetry and burrow excavation. In this way, the results obtained with the collapsed tunnels and opened burrows methods would not be confounded in any way by the activities associated with trapping, radio-equipping, and tracking moles, or with burrow excavation. We suggest that any carcasses of nontarget animals found in burrows or on treated plots and carcasses of at least six moles be collected and frozen for residue analyses. Residue analyses on moles and other small mammals should be either whole-body (minus fur and skin), or of stomach and duodenum (and their contents) and of muscle. For larger animals, muscle and gut samples should be analyzed separately.

In order to investigate the effects of radios on moles, we suggest that you monitor several moles trapped on untreated areas not involved in the efficacy assessment portion of the study. Moles recovered from this study also could be frozen to serve as "blanks" in the residue portion of the study.

- 2. The label submitted with your letter of December 10, 1992, does not correspond to any label previously accepted for this product. To permit your proposed study to be performed under an accepted and appropriate label, we have stamped this label "ACCEPTED with COMMENTS" and have accepted it conditionally, based upon the following conditions:
  - a. that the product only will be used for efficacy testing until such time as EPA has accepted an efficacy study with moles, such as the one proposed by the protocol submitted on December 10, 1992;
  - b. that any formulation changes needed for field tests be covered by amendments to this product's Confidential Statement of Formula submitted and accepted before the studies are begun; and
  - c. that the label changes indicated under item "4." below be made before any product is shipped for field testing.

4. The changes listed below must be made to the "DIRECTIONS FOR USE" portion of the label before this product is shipped for field testing:

a. Place the statement

"It is a violation of Federal law . . . labeling."

immediately below "DIRECTIONS FOR USE" and above "USE RESTRICTIONS".

b. amend the "USE RESTRICTIONS" subsection to read as follows:

"USE RESTRICTIONS: This product can be used to control eastern moles (Scalopus aquaticus) in applications directly to burrow systems in lawns, turf, golf courses, other non-crop areas, or in agricultural fields. Bait must be applied underground. Do not broadcast bait. Do not apply bait directly to food or feed crops."

c. Insert the subheading "APPLICATION DIRECTIONS" below the "USE RESTRICTIONS" paragraph. The first paragraph of "APPLICATION DIRECTIONS" should read as follows:

"APPLICATION DIRECTIONS: For best results, the directions below should be followed explicitly. As moles are active throughout the year, they may be baited at any time. However, the most opportune time is when fresh signs of mole activity are present."

The remaining paragraphs ("TUNNELS ARE OF TWO TYPES", "RIDGES OR RUNWAYS", and "MOLE HILLS OR MOUNDS") should follow as part of the "APPLICATION DIRECTIONS". Changes to these paragraphs will be deferred until the efficacy study has been completed.

If you plan to run efficacy trials in 1993 with species other than the eastern mole, submit a proposed revised label with the species to be tested and a protocol for the proposed test(s).

Sincerely yours,

Robert A. Forrest  
Product Manager (14)  
Insecticide-Rodenticide Branch  
Registration Division (H7505C)

PH 14 322-6

REGISTERED  
with COMMERCIAL  
in EPA Letter Dates  
MAR - 1 1983

322-6  
registered under EPA Reg  
under the Federal Insecticide  
Fungicide and Rodenticide  
Act amended, for the purpose  
of sale and use in the United States

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS  
AND DOMESTIC ANIMALS  
---DANGER---**

Convulsive person! Poisonous if swallowed. This bait may cause an allergic reaction; wear rubber gloves and long-sleeved adequate protective clothing when handling. Do not breathe dust. Do not contaminate feed and foodstuffs. Wash arms, hands, and face with Germicidal soap and water after using and before eating or accepting anything by mouth or smoking. All spilled bait must be cleaned up immediately. Keep away from children, pets, and domestic animals.

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish, birds, and other wildlife. Baits exposed on soil surface may be hazardous to birds and other wildlife. Do not contaminate water in lakes, streams, or ponds. Do not contaminate water by cleaning of equipment or disposal of wastes.

**ENDANGERED SPECIES RESTRICTIONS**

**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 to contact the Regional U.S. Fish and Wildlife Service (Endangered Species Specialist) or the local Fish and Game Office for specific information on endangered species. Strychnine baits should not be used in the geographic ranges of the following species except under programs and procedures approved by the U.S. EPA: San Joaquin kit fox, Aleutian Canada goose, Morro Bay kangaroo rat, Salt Marsh Harvest mouse, gray wolf, and grizzly bear.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**STORAGE:** Store only in original container, in a dry place inaccessible to children and pets, under lock and key in a posted storage area.

**PESTICIDE DISPOSAL:** Securely wrap original container in several layers of newspaper and discard in trash.

**NOTICE:** Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

# FORT DODGE



## MOLE BAIT SOFT PELLETS

ACTIVE INGREDIENT:		
Strychnine Alkaloid	0.50%	
INERT INGREDIENTS:	99.50%	
TOTAL	100.00%	

**KEEP OUT OF REACH OF CHILDREN  
DANGER-POISON**

**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, quiet, darkened room and keep him 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:** Flush 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 seizures.

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.

See label for additional precautionary statements.

### FORT DODGE CHEMICAL CO.

P.O. Box 2021 • Lompoc, CA 93438 • (805) 736-0055

EPA Est. No. 322-CA-01 • EPA Reg. No. 322-6

Net Wt. 1 Lb.

**BEST AVAILABLE COPY**

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DIRECTIONS FOR USE IN

**USE RESTRICTIONS:** It is a v this product in manner incors For subterranean applications or food uses.

**USE SITE:** All subsoil terre non-food crops and forestry a

**MILLS;** Talpidae Family: Scapan "shrew mole," and Scalopus For best results, these explicitly. As moles are act may be baited at any time; when fresh signs of mole acti

**TUNNELS ARE OF TWO TYPES;** Su raised in ridges or runways and other food, and the damp must excavate dirt forming, tunnels are resorted to when by some moles, as nest site most part, though common pat get to different areas backwards and at turning arou

**RIDGES OR RUNWAYS:** Before pl to determine which runways or determine activity stamp do runways and observe daily. I three Fort Dodge mole pellets probe hole made with a pencil cover these probe holes and soil.

**MOLE HILLS OR MOUNDS:** Bef necessary to determine which current use. To determine act or mound and observe daily. or mounds probe downward w gopher probe 12" to 18" fro Fort Dodge mole pellets in the opening securely with a piece dirt to sift in and cover bait baited areas should be chv remaining active systems shou ceases.