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APR 14 1992

Nott Manufacturing Co. Inc.
P.O. Box 685
Pleasant Valley, NY 12569

Gentlemen:

Subject: Smoke'em
EPA Reg. No. 358-137
Your letter of January 4, 1991

This letter reviews your quality assurance program and revised labeling.

1. Quality Assurance Program

Your letter describes procedures used for inspecting cartridges. However, it does not describe the sampling procedures used to determine which cartridges and what proportion of cartridges that workers and/or management inspect. Please provide this information to us.

As suggested in your letter, we tested three of the four fuses sent to us on August 21, 1989. An instrument approximately parallel to a concrete-slab substrate held the fuses. These fuses measured 87.5-90.0 mm and took 7.84-10.93 seconds to burn, as measured from the first appearance to disappearance of flame. In all cases, a small "surface" flame separate from the main "spitting" flame appeared immediately after ignition of the fuse. This surface flame quickly moved back the fuse, reaching its end in two cases but going out much sooner than the main flame. As we did not test the fuses with cartridges, we could not determine if this surface flame could have ignited cartridges or caused "flashback" in any other way.

2. Revised Labeling

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide,

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and Rodenticide Act, is acceptable subject to the comments listed below.

1. At your next printing, change "nontargets" to "nontarget animals" in the "ENVIRONMENTAL HAZARDS" section.
2. At your next printing, increase the contrast between the type and background of the names and percentages of the individual active ingredients and the text "Total 100%".

Submit five (5) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely,

Robert A. Forrest
Product Manager 14
Insecticide-Rodenticide Branch
Registration Division (H-7504C)

Enclosures: 1. Stamped labeling
2. A-79 Enclosure

RAF:dbp:CM2:RM221:305-5407:4/14/92:Peacock 61(22)

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NBT

SMOKE'em

KILLS MOLES IN THEIR HOLES

ACTIVE INGREDIENTS

INERT INGREDIENTS

NET CONTENTS 4 CARTRIDGES
Net Weight 4 Ounces

WARNING: Keep Out Of Reach Of Children
See back of box for first aid and precautionary statements

SMOKE'em

NBT

Pleasant Valley
N.Y. 12569

EPA Est. No. 358-NY-01
EPA Reg. No. 358-137

SMOKE'em

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. For control of moles (lawns, golf courses, non-crop areas), woodchucks (open fields, non-crop areas), ground squirrels (rangeland), and ground wasps (lawns, golf courses, non-crop areas). See enclosed insert for complete DIRECTIONS FOR USE.

PRECAUTIONARY STATEMENTS:
Hazards to Humans and Domestic Animals:
WARNING: After ignition, cartridge produces toxic gases (such as sulfur dioxide). Fumes may be harmful if inhaled.

STATEMENT OF PRACTICAL TREATMENT: If inhaled and person has poisoning symptoms (headache, nausea, dizziness, and weakness), transfer victim to fresh air. Have victim lie down and keep warm. If respiration is adequate, recovery will be rapid. If breathing has stopped, use artificial respiration. If available, pure oxygen should be given. **CALL A PHYSICIAN IMMEDIATELY.**

ENVIRONMENTAL HAZARDS: Gases produced by this product are highly toxic to wildlife. Check all burrows for signs of nontargets. If present, do not treat burrows. See enclosed "Endangered Species Considerations" insert.

CHEMICAL HAZARDS: Once ignited by the fuse, this cartridge will burn vigorously until completely spent and is capable of causing severe burns to exposed skin and clothes, and of igniting dry grass, leaves and other combustible materials.

STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Storage: Store in cool, dry place away from fire, heat and direct sunlight.
Pesticide Disposal: To dispose of unused cartridge, soak in water, crush and bury, at least 6" in loose soil. Container Disposal: Place in trash collection.

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**KILLS MOLES - WOODCHUCKS
GROUND SQUIRREL & GROUND WASPS**

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Beaver Dam Mountains, across Highway 91, west along the Arizona border and 10 miles to the Nevada border.

Not registered for control of moles in the state of Arizona.

MSIT
MSIT

ground squirrels (rangeland), and ground wasps (lawns, golf courses, non-crop areas).

APPLICATION DIRECTIONS

First prepare hole for treatment as specified below. Insert fuse into cartridge. Make sure that two inches or more of fuse protrudes from the cartridge before lighting it. Light fuse. Never hold the cartridge directly nor hold a burning cartridge in your hand. Work quickly as the minimum fuse burn time is five seconds. Insert fuse end into hole first. Cover cartridge with rock or sod. Only use inside of burrows and never inside of buildings.

Moles (lawns, golf courses, non-crop areas): When surface ridges are present, locate active runways by collapsing the ridge at several scattered points. Active runways will be re-constructed next day. Carefully punch a hole in the top of active tunnels. Light fuse, insert fuse-end first and carefully close the hole. Take care not to again collapse the tunnel or allow loose soil to smother the cartridge.

When a series of conical mounds is present, remove center plug with the aid of a long-handled spoon. Light fuse, insert fuse-end first into the underground tunnel. Close opening with rock or sod.

Woodchucks (open fields, non-crop areas): Locate all entrances. Select one for use and close all other entrances with rock and dirt. Light fuse, insert fuse-end first. Cover with rock and dirt being careful not to smother the cartridge with dirt. Consult state game laws before using this product for woodchuck control.

Ground Squirrels (rangeland): Collect plenty of dirt and other material for closing burrow openings.

will be rapid. If breathing has stopped, use artificial respiration. If available, pure oxygen should be given. **CALL A PHYSICIAN IMMEDIATELY.**

ENVIRONMENTAL HAZARDS

Gases produced by this product are highly toxic to wildlife. Check all burrows for signs of rodent targets. If present, do not treat burrows. See enclosed "Endangered Species Considerations" below.

CHEMICAL HAZARDS

Once ignited by the fuse, this cartridge will burn vigorously until completely spent and is capable of causing severe burns to exposed skin and clothes, and of igniting dry grass, leaves, and other combustible materials.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For control of moles (lawns, golf courses, non-crop areas), woodchucks (open fields, non-crop areas).

Treat each burrow opening by lighting fuse and inserting cartridge fuse-end first into hole. (Make sure hole is large enough for easy insertion before lighting fuse.) Cover hole immediately, taking care not to smother cartridge with loose dirt. Immediately cover all openings from which gas escapes. Proceed to the next closest open burrow and treat as above.

Ground Wasps (lawns, golf courses, non-crop areas): Treat in the late evening when most wasps should be inside. Cover exposed skin with appropriate clothing and netting, to reduce chance of being stung. Collect plenty of dirt and other material for closing hole. Insure hole is large enough to insert cartridge. Light fuse and insert cartridge fuse-end first. Cover being careful not to smother the lighted cartridge.

Endangered Species Considerations

Black-Footed Ferret:

"Do not use this product in the range of the Black-footed ferret. Contact the nearest U.S. Fish and Wildlife Service Office (Endangered Species Specialist) before the product is used. They will arrange for a survey of the proposed use site."

Utah Prairie Dog:

In Utah do not use this product in the range of the Utah Prairie dog.

San Joaquin Kit Fox:

"This pesticide should not be used within 1 mile of active dens of the San Joaquin kit fox in the following California counties: Kern, Kings, Fresno, San Luis Obispo, Merced, Monterey, Santa Barbara, Ventura, Tulare, and San Benito. Prior to use, contact the California Department of Fish and Game for recommendations."

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