

5516751
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January 9, 1997

Ms. Daria Mills
Registration Specialist
Charles H. Lilly Company
P.O. Box 83179
Portland, OR 97223-0179

Dear Ms. Hickman:

Subject: Cooke Quick Action Gopher Mix
EPA Registration No. 909-2
Your Submission of November 1, 1997

We have reviewed the proposed revised label that you submitted on November 1, 1996, and find it to be acceptable, subject to the comments in the remainder of this letter.

1. The pocket gopher illustration on your current label (accepted December 12, 1990) may be retained on the label.
2. The skull and crossbones must be retained.
3. Introduce the paragraph "It may be difficult . . . prolonged" under "NOTE TO PHYSICIAN:" with the word "NOTICE:".
4. Make sure that the subheadings to the "DIRECTIONS FOR USE" are left-justified and that the main heading is centered. Such is the case on the draft proposed revised label submitted on November 1, 1996, but not for the subheading "USE RESTRICTIONS" on the current label.
5. Your proposed revised label did not indicate where the various elements of label text are to go on the container. We assume that the new label is to be laid out in the manner of the current accepted letter. If not, make sure that the layout is consistent with the requirements of 40 CFR, §156.10.

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

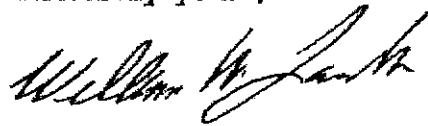
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6. Submit one copy of the final printed label before releasing this product for shipment. Make sure that the final printed label at least meets the minimum requirements of the "A-79 ENCLOSURE".

Note that the due date for you new Storage Stability study (Guideline No. 63-17) is April 11, 1998 — not April 11, 1988, as was erroneously stated in our letter of October 11, 1996.

If you have any questions regarding the content of this letter, you may call me at 703-305-6406.

Sincerely yours,



William W. Jacobs
Acting Product Manager I4
Insecticide-Rodenticide Branch
Registration Division (7505C)

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COOKE QUICK ACTION GOPHER MIX

FOR CONTROL OF POCKET GOPHERS
READY-TO-USE
POISON GRAINS

ACTIVE INGREDIENT:
Strychnine alkaloid 0.50%
INERT INGREDIENTS 99.50%

Keep out of reach of children
POISON
DANGER

ACCEPTED
with COMMENTS
by EPA Letter Dated

JAN 09 1997

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended for the pesticide registration under EPA Reg. No. 909-2

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 a 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: Administer 100% Oxygen by positive pressure to provide as much pulmonary gas exchange as possible, despite seizures. Administer ANTICONVULSANT DRUGS intravenously to control convulsions.

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 side panel for additional precautionary statements.

NET WT. 1 LB. (454 g)

COOKE QUICK ACTION GOPHER MIX is a carefully proportioned mixture of grains poisoned by a tested process. NOTE: COOKE QUICK ACTION GOPHER MIX is hereinafter referred to as bait.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Convulsive Poison! Poisonous if swallowed. Do not breathe dust. Do not get in eyes, on skin, or on clothing. 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 the bait and wear rubber gloves while handling.

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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 apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply directly to food or feed crops. Do not contaminate water when disposing of equipment washwaters.

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 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.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS

For use to control pocket gophers (*Geomys* spp. and *Thomomys* spp.). Bait must be applied directly into underground burrow systems. Do not apply this product by use of a mechanical burrow builder.

BAITING

Burrowing pocket gophers (*Thomomys* spp. and *Geomys* spp.) throw out low, fan shaped mounds on either side of their underground tunnel. These lateral tunnels coming to the surface are on the flat side of the fan and are plugged with soil. Remove burrow plug from the flat side of the burrow fan. Use long-handled spoon and insert 1 teaspoon of bait into main runway system. Close tunnel with soil. Do not permit soil to cover bait. Depending upon pocket gopher population levels, one-quarter (1/4) cup applied by hand will treat 4500 to 35000 square feet.

STORAGE AND DISPOSAL

Storage: Store only in original container, in a dry place inaccessible to children, pets, and domestic animals.

Pesticide Disposal: Securely wrap original container in several layers of newspaper and discard in trash.

Filled by weight not by volume. Product may settle after packaging.

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.

COOKE LABORATORY PRODUCTS

PORTLAND, OREGON 97203

EPA Reg. No. 909-2

EPA Est. 66196-CA-01

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