

PM 14

2935-508

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300/18

January 30, 1997

Ms. Joanne Striebich  
Regulatory Affairs  
Wilbur Ellis Company  
191 West Shaw Avenue, Suite 107  
Fresno, CA 93704-2876

Dear Ms. Striebich

Subject: MILD BAIT FOR ROCKET COPIERS  
EPA Registration No. 2935-508  
Your Submission Dated October 23, 1996

We have reviewed your proposed revised label submitted on October 23, 1996. The label submitted on that date is acceptable provided that you make all the label changes and comply with the conditions stipulated below.

1. In the "RESTRICTED USE PESTICIDE" box, change "DUE TO HIGH ACUTE TOXICITY" to "DUE TO HAZARD TO NONTARGET ORGANISMS". The latter wording is adapted from text in 40 CFR, §152.175, which pertains to burrow-builder applications of Strychnine baits.
2. Left-justify and reduce the type size (or delete the underlining) for the subheadings "USE RESTRICTIONS" and "BAITING" of the "DIRECTIONS FOR USE". It must be absolutely clear to readers that the "DIRECTIONS FOR USE" do not begin and end with the "It is a violation . . . labeling" sentence. Note that these subheadings are displayed appropriately on the label of your other registered strychnine bait, 2935-524.
3. To the second paragraph of the "USE RESTRICTIONS" subsection of the "DIRECTIONS FOR USE", add the sentences shown immediately below.

Do not apply this product above the ground surface. Do not apply this product over food or feed crops. Do not broadcast bait.

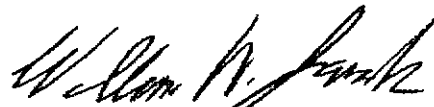
## CONCURRENCES

|         |  |  |  |  |  |  |  |
|---------|--|--|--|--|--|--|--|
| SYMBOL  |  |  |  |  |  |  |  |
| SURNAME |  |  |  |  |  |  |  |
| DATE    |  |  |  |  |  |  |  |

4. Submit one copy of final printed labeling for our files before releasing this product for shipment.

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 14  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

**RESTRICTED USE PESTICIDE  
DUE TO HIGH ACUTE TOXICITY**

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certification.



# Milo Bait For Pocket Gophers

For Hand or Burrow Machine Baitings

|                           |         |
|---------------------------|---------|
| ACTIVE INGREDIENT:        |         |
| Strychnine Alkaloid ..... | 50%     |
| INERT INGREDIENTS .....   | 99.50%  |
| TOTAL .....               | 100.00% |

ACTIVE INGREDIENTS  
with COMMENTS  
in EPA Letter Dated

**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 has passed since poison was taken, give 1 to 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 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 ANTICONSULSANT 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 SIDE PANEL FOR OTHER PRECAUTIONARY STATEMENTS

EPA Reg. No. 2935-508

EPA Est. No. 2935-CO-001

Net Contents

lbs.

Manufactured By:  
**WILBUR-ELLIS COMPANY**  
P.O. BOX 16458 • FRESNO, CA 93755

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### — DANGER —

**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.

### 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, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not apply directly to food or feed crops.

### 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 USEPA: California Condor, San Joaquin Kit Fox, Aleutian Canada Goose, Morro Bay Kangaroo Rat, Gray Wolf, and Grizzly Bear.

### STORAGE AND DISPOSAL

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

**STORAGE:** Store in original labeled container, in a cool and dry place inaccessible to children, pets and domestic animals. Do not stock containers more than three high. Do not store directly on concrete floors or concrete walls. Avoid contamination of other pesticides, fertilizers, food and feed.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spilled bait, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of bags in a sanitary landfill or by incineration if allowed by State and local authorities. If burned, stay out of smoke.

### DIRECTIONS FOR USE

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

### USE RESTRICTIONS

For use on rangeland, pasture, cropland and nonagricultural areas to control the following species of pocket gophers: Northern (*Thomomys talpoides*); Southern (*Thomomys umbrinus*); Camas (*Thomomys bulbivorus*); Valley (*Thomomys bottae*); Mazama (*Thomomys mazama*); Plains (*Geomys bursarius*); Mountain (*Thomomys monticola*); Townsends' (*Thomomys townsendi*).

Bait should be applied directly into underground burrow system.

### BAITING

**ARTIFICIAL BURROW-BUILDER METHOD:** Follow manufacturer's instructions for the equipment used to apply gopher bait. Apply 1 to 2 pounds of bait per acre using 20- to 30-foot row-spacing intervals. Apply only when soil condition is proper to insure formation of a good artificial burrow.

**HAND BAITING:** Remove burrow plug from the flat side of the burrow fan. Use long-handled spoon and insert one teaspoon of bait into the main runway system. Do not permit soil to cover bait. Depending upon pocket gopher population levels, one pound of bait applied by hand will treat one to eight acres.

**NOTICE:** The statements made on this label are believed to be true and accurate, but because of conditions of use which are beyond our control, WILBUR-ELLIS COMPANY does not make, nor does it authorize any agent or representative to make, any warranty, guaranty or representation, expressed or implied, concerning this material or the use thereof, except in conformity with the statements on the label. Neither WILBUR-ELLIS COMPANY nor the seller shall be held responsible in any manner for any personal injury or property damage or loss resulting to the buyer or to the other person from handling, storage or use of this material, not in accordance with directions. The buyer assumes all risk and liability resulting from improper handling, storage or use and accepts and uses this material on these conditions.

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