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Mr. Edward W. Schafer, Jr.
U.S. Department of Agriculture
Animal and Plant Health Inspection Service
Animal Damage Control
Building 16, Denver Federal Center
P.O. Box 25266
Denver, CO 80225-0266

Dear Mr. Schafer

Subject: Gas Cartridge
EPA Reg. No. 56228-2
Your letters Dated November 7, 1989 and January 23, 1990

Whether EPA will accept your suggested changes in product composition and in latency to appearance of side flame will depend upon actual test results. While the end of the cartridge away from the fuse may remain cool for some time after cartridge ignition, we are concerned that product users might not always be afforded enough time to light cartridges and insert them into burrows safely.

As minimum latencies are intend to be "guarantees", you should note that the degree of variability of scores is very important to determining the likelihood that latencies will be above a specified minimum. Mean scores should be well above the specified minimum and the likelihood of a given result being at or below the specified minimum should be less than one in one thousand. The latency to appearance of side flame is measured from the moment that the cartridge ignites until the appearance of side flame. You also should note the latency to the appearance of the brown spot which, in your tests with the coyote cartridge, typically preceded the appearance of the side flame.

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58077;I:Palgateer;M-8:KENCO:3/26/90:5/26/90:dg:sw:vo:dd:dg

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

Fast tests with your fuses indicated that they should be at least 5" long and that at least 3" of fuse should protrude from each cartridge after fuse insertion. Such fuse lengths should be used in tests with the two-ingredient formulation in a cartridge made with "flame retardant paper."

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted.

Revise the Utah prairie dog consideration to Do not use this product in the range of the Utah Prairie dog (Garfield, IRON, Kane, PIUTE, SEVIER, and Wayne Counties, Utah).

Submit five (5) copies of your final printed labeling before you release the product for shipment. Refer to the A-79 Enclosure for a further description of final printed labeling.

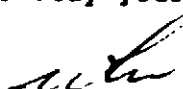
If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

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

The Confidential Statement of Formula (CSF) dated October 23, 1989 is acceptable.

If you have any questions please contact Steve Palmatzer at (703) 557-4408.

Sincerely yours,



William H. Miller
Product Manager (15)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

After ignition, cartridge produces toxic gases. Fumes may be harmful if inhaled.

ENVIRONMENTAL HAZARDS

This product is highly toxic to wildlife. Check all burrows for signs of nontarget species. If present, do not treat burrows.

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.

ENDANGERED SPECIES CONSIDERATIONS

NOTICE: It is a Federal offense to use any pesticide in a manner that results in the death of a member of an endangered species.

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: Do not use this product in the range of the Utah prairie dog (Utah).

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, Otispc, Merced, Monterey, Santa Barbara, Ventura, Tulare, and San Benito. Prior to use, contact the California Department of Fish and Game for recommendations.

Blunt-Nosed Leopard Lizard: This pesticide should not be used in the range of the blunt-nosed leopard lizard in the following California counties: Kern, Fresno, Kings, Madera, Merced, and Tulare. Prior to use, contact the California Department of Fish and Game for recommendations.

Eastern Indigo Snake: Do not use this product in the range of the eastern indigo snake in the following states: Mississippi, Alabama, South Carolina, Georgia, and Florida.

Desert Tortoise: This pesticide should not be used in the critical habitat of the Beaver Dam slope population of the desert tortoise in Utah. This comprises an area extending from the southwest-facing slope of the Beaver Dam Mountains, across Highway 91, west along the Arizona border and 10 miles to the Nevada border.

GAS CARTRIDGE

For control of woodchucks, ground squirrels, prairie dogs and pocket gophers.

NOT FOR SALE TO PERSONS UNDER 16 YEARS OLD

ACTIVE INGREDIENTS:

Sulphur	10.84%
Charcoal	17.34%
Red Phosphorus	3.25%
Sodium Nitrate	43.36%
Sawdust	3.52%
Total	78.31%

INERT INGREDIENTS:

Borax	3.25%
Fullers Earth	4.35%
Mineral Oil	14.09%
Total	21.69%

TOTAL 100.00%

KEEP OUT OF REACH OF CHILDREN WARNING

STATEMENT OF PRACTICAL TREATMENT CALL A PHYSICIAN OR POISON CONTROL CENTER IMMEDIATELY!

If inhaled and person has poisoning symptoms (headache, nausea, dizziness, 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.

SEE LEFT SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE
ANIMAL DAMAGE CONTROL

Hyattsville, MD 20782
EPA Est. No. 56228-1D-1
EPA Reg. No. 56228-2

Net Weight 85 grams

BEST QUALITY

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Do not contact disposal.

STORAGE: heat and dry

PESTICIDE cartridges, so loose soil

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Select burrow the entrance diameter, put marked inser there is a m cartridge awa

NOTE: The 5 seconds.

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REFER TO SPECIFIC DI

DIRECTIONS FOR USE (Continued)

TARGET-SPECIFIC DIRECTIONS FOR USE

WOODCHUCKS: Locate all burrow entrances if possible. Select one for treatment and close all others with rock and soil. Light fuse and insert cartridge fuse-end first. Cover opening with rock and soil, being careful not to smother cartridge. Consult state game laws before using this product for woodchuck control.

GROUND SQUIRRELS and PRAIRIE DOGS: Collect soil and other material to close burrow openings. Treat each burrow opening by lighting fuse and inserting cartridge into burrow, fuse-end first (make sure burrow is large enough for easy insertion of cartridge before lighting fuse). Cover burrow immediately, taking care not to smother cartridge with loose soil. Immediately cover all nearby cracks in soil or openings from which gas escapes. Proceed to nearest open burrow and follow same procedure.

POCKET GOPHERS: Locate fan-shaped soil mounds with signs of recent activity. Find the horseshoe-shaped depression on one side of the mound. To locate the main runway, probe ground 15-18 inches from mound on the same side as depression. The main runway has been located when friction on probe is released and it falls into runway. Dig down to main runway, taking care to not block it with soil. Locate an opening large enough for easy insertion of the cartridge. Collect enough soil and other material to close opening. Light fuse and insert cartridge fuse-end first. Immediately cover opening taking care not to smother cartridge with loose soil. Cover all nearby cracks in soil where gas escapes. Treat all active mounds.

1970-1971

Select burrow, make sure cartridge will enter freely and obtain material to plug entrance(s). Puncture end cap with 1/8" nail where indicated. Insert fuse in one of center holes. Insure that there is a minimum of 3 inches of exposed fuse. Hold cartridge away from face and body and light fuse. Place cartridge fuse-end first into burrow as far as possible. Plug burrow and any other gas leaks as soon as possible.

Minimum Fuse Burn Time is 5 sec.

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**GAS CARTRIDGE
REGISTRATION NO. 56228-2**

CONTAINS SULPHUR (10.84%), CHARCOAL (17.34%), RED PHOSPHORUS (3.25%), SODIUM NITRATE (43.36%), and SAWDUST (3.52%)

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