

6/23/97

PM 14

56228-11

182

5516892  
305/18  
5525417  
300/17

June 23, 1997

Dr. Alan V. Tasker  
Acting Leader, Data Support Team  
Technical and Scientific Services  
USDA/APEIS/BEEP  
Unit 150  
4700 River Road  
Riverdale, MD 20737

Dear Dr. Tasker:

Subject: 0.5% Strychnine Milo  
EPA Registration No. 56228-11  
Your Submissions of September 23, 1996,  
and June 2, 1997

We have reviewed your submission of September 19, 1996. The changes in the inert ingredients and the revised basic and alternate Confidential Statements of Formula (CSFs) are acceptable. We look forward to receiving the product chemistry data on the new formulation. Your letter of September 23, 1996, indicates that some of those studies were underway at that time.

The proposed revised label submitted on June 2, 1997, is basically acceptable, but the change identified below must be made.

1. In the "NOTE TO PHYSICIAN", change "CAUTION:" to "NOTICE:" so as not to conflict with the label's required signal word "DANGER".

Submit one copy of the final printed label before releasing this product for shipment.

Sincerely yours,

William W. Jacobs  
Acting Product Manager 14  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

**BEST AVAILABLE COPY**

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

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

**DANGER**

Convulsive Poison! Poisonous if swallowed. Do not breathe dust. Do not contaminate feed and food-stuffs. 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, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply where runoff is likely to occur. 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 an endangered species during strychnine baiting operations may result in a fine and/or imprisonment 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, Grizzly Bear, and Salt Marsh Harvest Mouse.

**RESTRICTED USE PESTICIDE  
DUE TO HAZARDS TO NON-TARGET  
ORGANISMS**

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 Applicators certification.

**0.5% STRYCHNINE MILO  
POCKET GOPHER BAIT FOR  
USE IN BURROW BUILDERS**

**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 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 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.

UNITED STATES DEPARTMENT OF AGRICULTURE  
ANIMAL AND PLANT HEALTH INSPECTION SERVICE  
Riverdale, MD 20737  
EPA Est. No. 56228-ID-1  
EPA Reg. No. 56228-11

Net Weight      lbs.

**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, pets and domestic animals.

**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 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.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Sale, distribution and use of this product must be in accordance with the provisions of the final order on Strychnine by the Administrator of the U.S. Environmental Protection Agency.

**USE RESTRICTIONS**

This product may be used to control plains pockets gophers (*Geomys bursarius*), northern pocket gophers (*Thomomys talpoides*), southern pocket gophers (*Thomomys umbrinus*), Mazama pocket gophers (*Thomomys mazama*), and yellow-faced pocket gophers (*Pappogeomys castanops*) in underground applications (only) in rangelands, pastures, croplands, and non-agricultural areas. This product must be applied by use of a mechanical burrow builder. Do not apply bait above ground. Do not broadcast bait.

**BAITING**

**Burrow Builder Applications:** Follow manufacturer's instructions for the equipment used to apply bait. Apply 1 to 2.5 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.

ACCEPTED WITH COMMENTS  
JUN 23 1997  
56228-11