

6/23/97

PM 14

56228-19

Pg 162

S 516891  
305/18  
S525429  
300/18

June 23, 1997

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

Dear Dr. Tasker:

Subject: 0.5% Strychnine Milo For Hand Baiting Pocket Gophers  
EPA Registration No. 56228-19  
Your Submissions of September 23, 1996,  
and June 2, 1997

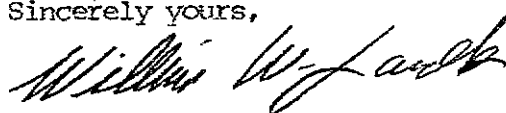
We have reviewed your submission of September 19, 1996. The changes in the inert ingredients and the revised basic and alternate Confidential Statements of Formula (CSFs) are acceptable. We look forward to receiving the product chemistry data on the new formulation. Your letter of September 23, 1996, 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 contaminate water by cleaning of equipment, or disposal of wastes. Do not apply directly to food or feed crops.

**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 against Plains Pocket Gopher (*Geomys bursarius*), Desert Pocket Gopher (*Geomys arenarius*), Yellow-faced Pocket Gopher (*Pappogeomys castanops*), Northern Pocket Gopher (*Thomomys talpoides*), Southern Pocket Gopher (*Thomomys umbrinus*), Mazama Pocket Gopher (*Thomomys mazama*), Mountain Pocket Gopher (*Thomomys monticola*), Townsend's Pocket Gopher (*Thomomys townsendii*), Botta Pocket Gopher (*Thomomys bottae*), Camas Pocket Gopher (*Thomomys bulbivorus*). Do not apply this product by use of a mechanical burrow builder. Do not apply this product in residential sites. Bait must be placed directly into underground burrow systems.

**BAITING**

Remove burrow plug from the flat side of the burrow fan. Use a long handled spoon and insert 1 teaspoon bait into main runway system. Close tunnel with soil. Do not permit soil to cover bait. Depending upon pocket gopher population levels, one pound of bait will treat one to eight acres when applied by hand.

**0.5% STRYCHNINE POLO  
FOR HAND BAITING  
POCKET GOPHERS**

**ACTIVE INGREDIENT**

Strychnine Alkaloid. . . . . 0.5%  
INERT INGREDIENTS. . . . . 99.5%  
TOTAL: . . . . . 100.0%

**KEEP OUT OF THE 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 the 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 20737-1237  
EPA Reg. No. 56228-19  
EPA Est. No. 56229-ID-1

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 bottoms 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.

ACORN  
EPA COMMENT  
EPA Letter Dated  
JUN 23 1997  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended for the pesticide  
registered under EPA Reg. No.  
56228-19