



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 3, 2020

David Bergsten
Assistant Chief
USDA APHIS Environmental and Risk Analysis Services
4700 River Road, Unit 149
Riverdale, MD 20737

Subject: Addition of PF10 respirator to strychnine labels as required by the EPA letter dated July 19, 2019
Product Name: Strychnine Milo - Hand Baiting
EPA Registration Number: 56228-19
Application Date: August 12, 2019
Decision Number: 554073

Dear Mr. Bergsten:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. You are permitted to sell or distribute products under the previously approved labeling for a period of 18 months from the date of this amendment. After this 18-month period, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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

If you have any questions about this letter, please contact Srijana Shrestha by phone at 703-305-6471, or via email at shrestha.srijana@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington".

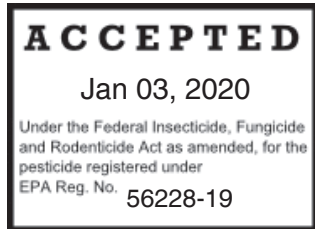
Linda Arrington, Branch Chief
Risk Management and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

Enclosure

STRYCHNINE MILO – HAND-BAITING

ACTIVE INGREDIENT	
Strychnine alkaloid	0.5%
OTHER INGREDIENTS	99.5%
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN
DANGER – PELIGRO
POISON



FIRST AID	
Have the product container or label with you when calling a poison control center or doctor, or when going for treatment. For a medical emergency involving this product, call the Poison Control Center at 1-800-222-1222. For non-emergency information concerning this product, call the National Pesticide Information Center at 1-800-858-7378.	
If swallowed:	<ul style="list-style-type: none">CALL A PHYSICIAN OR POISON CONTROL CENTER IMMEDIATELY FOR TREATMENT ADVICE.If less than ten (10) minutes have passed since the 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 victim lie down in a quiet, darkened room and keep victim warm and quiet.If victim is unconscious, do not give anything by mouth and do not induce vomiting.
If inhaled:	<ul style="list-style-type: none">Remove person to fresh air.If not breathing, give artificial respiration.Call a poison control center or doctor for further treatment advice.
If in eyes:	<ul style="list-style-type: none">Hold eyes open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.Call a poison control center, doctor for further treatment advice.
If on skin:	<ul style="list-style-type: none">Wash with plenty of soap and water.Call a poison control center or doctor for further treatment advice.
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. NOTICE: 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 BELOW FOR ADDITIONAL PRECAUTIONARY STATEMENTS.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

DANGER: Convulsive Poison! Fatal if swallowed or inhaled. Harmful if absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Do not breathe dust. Do not apply this product in a way that will contact any person or pet. Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

- long-sleeved shirt and pants,
- cotton gloves,
- shoes plus socks, and
- a minimum of a NIOSH-approved particulate filtering facepiece respirator with any R or P filter; OR a NIOSH-approved elastomeric particulate respirator with any R or P filter; OR a NIOSH-approved powered air purifying respirator with an HE filter.

When loading a bait-dispensing probe and when disposing of non-rigid containers (e.g., bags), handlers must wear:

- long-sleeved shirt and long pants,
- waterproof gloves,
- shoes plus socks,
- goggles or face shield, and
- a minimum of a NIOSH-approved particulate filtering facepiece respirator with any R or P filter; OR a NIOSH-approved elastomeric particulate respirator with any R or P filter; OR a NIOSH-approved powered air purifying respirator with an HE filter.

Follow manufacturer's instructions for cleaning and maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Remove clothing immediately if pesticide gets inside. Wash thoroughly before putting on clean clothes.

Remove PPE immediately after handling this product. Wash the outside of waterproof gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and other wildlife. Do not allow bait to be exposed on soil surface. 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 the cleaning of equipment or the 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 U.S. Environmental Protection Agency: California Condor, San Joaquin Kit Fox, Morro Bay Kangaroo Rat, Gray Wolf, Grizzly Bear and Salt Marsh Harvest Mouse.

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 only be used in manual, below-ground applications to pocket gophers' burrow systems located in rangelands, pastures, croplands, forests, and non-agricultural areas to control the following pocket gophers: *Cratogeomys* spp., *Geomys* spp., and *Thomomys* spp. (but excluding the Mazama pocket gopher (*T. mazama*) within Thurston and Pierce Counties, Washington). Bait must be placed directly into pocket gophers' underground burrow systems. Do not apply this product by use of a mechanical burrow builder. Do not apply this product at residential sites. Strychnine baits should not be used in the geographic ranges of any state or federally protected pocket gopher subspecies or populations. Do not apply this product above ground level, to the ground surface, or on any food or feed crop. Do not apply this product in a way that will contact workers, other persons, or domestic animals. Keep pets and other people out of the area during application.

BAITING

Make at least 2 baits sets per active burrow system. Additional sets, up to 7 per system, may be needed for systems with large numbers of mounds. Depending upon pocket gopher population levels, 1 pound (0.45 kg) of bait will treat 1 to 8 acres (0.41 to 3.24 ha) when applied by hand. Apply this product using either of the methods described below.

Probe Method: Pocket gophers' fan-shaped dirt mounds have a horseshoe-shaped depression or burrow plug on the flat side of the fan. Locate gophers' main underground runway by using a gopher-probe product, a rod, or a smooth strong stick to probe the ground surrounding the mound. Begin probing on the plug side, about a foot away from the mound. The optimum probing distance may vary from species to species and place to place. When soil resistance against the probe decreases abruptly, the main runway has been entered.

Remove probe and enlarge probe hole slightly if necessary to accommodate baiting. Deposit 1 teaspoonful of bait through probe hole and into main runway. If a bait-dispensing probe is used, deposit 1 teaspoon amount of bait through the probe before removing it. Cover probe hole with dirt and other materials, taking care not to let soil cover bait. Immediately collect and remove any bait that spills on the ground surface.

Lateral Tunnel Method: Remove plug from the flat side of the burrow fan. Using a long-handled spoon, insert 1 teaspoonful of bait into the main runway system. Close the tunnel with soil. Do not permit soil to cover bait. Immediately collect and remove any bait that spills on the ground surface.

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD, OR FEED BY STORAGE OR DISPOSAL.

LEAKS, FIRE OR SPILLS: For leaks, fire or spills only, call 1-800-535-5053 and have product container or label with you when obtaining advice.

PESTICIDE 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 rinseate 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: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Completely empty container by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. If container is not to be recycled, dispose of bag, drum or canister in a sanitary landfill or by incineration, if allowed by State and local authorities.