



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 3, 2020

Mike R. Jackson
President
R & M Exterminators, Inc.
24212 S. D Street
Cheney, WA 99004

Subject: Addition of PF10 respirator to strychnine labels as required by the EPA letter dated July 19, 2019
Product Name: Pocket Gopher Bait Containing Strychnine 1-10 Formulation on Oats
EPA Registration Number: 4271-10
Application Date: 8/6/2019
Decision Number: 555125

Dear Mr. Jackson:

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.

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Decision No. 555125

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", with a stylized flourish at the end.

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

Enclosure

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

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 handlers when handling containers, or loading bait into mechanical application equipment, or hand baiting, or when disposing of non-rigid containers (e.g. bags), must wear: • long-sleeved shirt and long pants • Waterproof gloves • Shoes plus socks • Goggles or face shield; and wear a minimum of a NIOSH-approved particulate filtering facepiece respirator with an R, or P; OR a NIOSH-approved elastomeric particulate respirator with any R, or P filter; OR a NIOSH-approved powered air purifying respirator with a HE filter.

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

USER SAFETY RECOMMENDATIONS:

Users should remove clothing immediately if pesticide gets inside. Then, wash thoroughly and put on clean clothing.

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 cleaning of equipment, or disposal of wastes.

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: gray wolf, grizzly bear, Morro Bay kangaroo rat, salt marsh harvest mouse and San Joaquin kit fox.

STORAGE AND DISPOSAL

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

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 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 HANDLING: Non refillable container. Do not reuse or refill this container. Offer for recycling, if available. 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.

**RESTRICTED USE PESTICIDE
DUE TO HAZARD TO NONTARGET 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 Applicator's Certification.

POCKET GOPHER BAIT

CONTAINING

STRYCHNINE 1-10 FORMULATION ON OATS

ACTIVE INGREDIENT: STRYCHNINE	0.5%
INERT INGREDIENTS	99.5%
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN



FIRST AID

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 the throat with finger. Repeat until vomit fluid is clear. Have patient lie down in a quiet, darkened room and keep him warm and quiet. If person is unconscious, do not give anything by mouth and do not induce vomiting.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration. Get medical attention.

IF IN EYES: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

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.

FOR ADDITIONAL PRECAUTIONARY STATEMENTS SEE SIDE PANEL.

MFG. BY: R & M EXTERMINATORS, INC.
24212 SOUTH "D" STREET
CHENEY, WA 99004

EPA EST. NO.: 4271-WA-1
EPA REG. NO.: 4271-10

NET CONTENTS 10 LBS.

DIRECTIONS FOR USE

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

USE RESTRICTIONS: This product may only be used in underground applications to control northern pocket gophers (*Thomomys talpoides*) in orchards, alfalfa fields, hay fields, pastures, rangelands, and noncrop areas. Bait must be applied directly into pocket gophers' underground tunnels or into artificial burrow systems using the methods prescribed on this label. Do not apply this product above the ground surface. Do not apply this product over food and feed crops. Pick up and properly dispose of spilled bait. Do not apply this product in a way that will contact workers, other persons, pets, or domestic animals. Keep pets and other people out of the area during application.

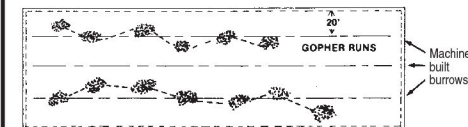
BAITING DIRECTIONS

HAND BAITING

Bait must be placed into pocket gopher runways. Remove burrow plug from the flat side of the burrow fan. Using a long-handled spoon, insert one tea-spoon of bait into the main runway system. Close tunnel with soil in such a manner that soil will not cover bait. Depending upon the density of burrow systems, one pound of bait will treat one to eight acres.

ARTIFICIAL BURROW-BUILDER METHOD

When treating extensive areas, "BURROW BUILDERS" may be used. Follow manufacturer's instructions for the equipment used to apply gopher bait. Make sure that machine-built burrows intersect pocket gopher burrows at the depth at which gophers have been tunneling. For greater efficiency of treatment, machine-built burrows should intersect as many gopher tunnels as possible at right angles. Apply bait at a rate of 1 to 2 pounds per acre, using a 20' to 30' row spacing interval. Apply only when soil condition is proper to insure formation of a good artificial burrow.



WARRANTY

Seller warrants that this product conforms to the chemical description of the label and is reasonably fit for the purposes referred to in the directions for use. Seller makes no other warranties, express or implied, including FITNESS or MERCHANTABILITY. In no case shall the seller be liable for consequential, special, or indirect damages resulting from the use or handling of this product. The foregoing is a condition of sale by the Seller and is acceptable as such by the buyer.

BATCH CODE _____

ACCEPTED

Jan 3, 2020

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 4271-10

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HAZARDS TO HUMANS
AND DOMESTIC ANIMALS**

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PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and handlers when handling containers, or loading bait into mechanical application equipment, or hand baiting, or when disposing of non-rigid containers (e.g. bags), must wear: • long-sleeved shirt and long pants • Waterproof gloves • Shoes plus socks • Goggles or face shield; and wear a minimum of a NIOSH-approved particulate filtering facepiece respirator with an R, or P; OR a NIOSH-approved elastomeric particulate respirator with any R, or P filter; OR a NIOSH-approved powered air purifying respirator with a HE filter.

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USER SAFETY RECOMMENDATIONS:

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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 cleaning of equipment, or disposal of wastes.

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: gray wolf, grizzly bear, Morro Bay kangaroo rat, salt marsh harvest mouse and San Joaquin kit fox.

STORAGE AND DISPOSAL

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

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 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 HANDLING: Non refillable container. Do not reuse or refill this container. Offer for recycling, if available. 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.

**RESTRICTED USE PESTICIDE
DUE TO HAZARD TO NONTARGET ORGANISMS**

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POCKET GOPHER BAIT

CONTAINING

STRYCHNINE 1-10 FORMULATION ON OATS

ACTIVE INGREDIENT: STRYCHNINE	0.5%
INERT INGREDIENTS	99.5%
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN



FIRST AID

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 the throat with finger. Repeat until vomit fluid is clear. Have patient lie down in a quiet, darkened room and keep him warm and quiet. If person is unconscious, do not give anything by mouth and do not induce vomiting.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration. Get medical attention.

IF IN EYES: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

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.

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MFG. BY: R & M EXTERMINATORS, INC.
24212 SOUTH "D" STREET
CHENEY, WA 99004

EPA EST. NO.: 4271-WA-1
EPA REG. NO.: 4271-10

NET CONTENTS 25 LBS.

DIRECTIONS FOR USE

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

USE RESTRICTIONS: This product may only be used in underground applications to control northern pocket gophers (*Thomomys talpoides*) in orchards, alfalfa fields, hay fields, pastures, rangelands, and noncrop areas. Bait must be applied directly into pocket gophers' underground tunnels or into artificial burrow systems using the methods prescribed on this label. Do not apply this product above the ground surface. Do not apply this product over food and feed crops. Pick up and properly dispose of spilled bait. Do not apply this product in a way that will contact workers, other persons, pets, or domestic animals. Keep pets and other people out of the area during application.

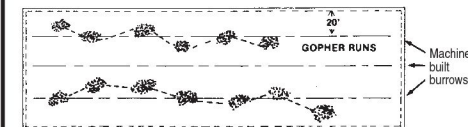
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ARTIFICIAL BURROW-BUILDER METHOD

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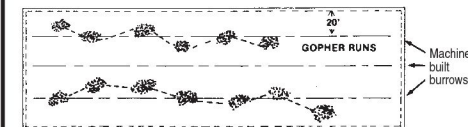
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MFG. BY: R & M EXTERMINATORS, INC.
24212 SOUTH "D" STREET
CHENEY, WA 99004

**EPA EST. NO.: 4271-WA-1
EPA REG. NO.: 4271-10**

NET CONTENTS 50 LBS.