



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460**

**OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION**

August 30, 2022

Arianna Shorey
Agent
R&M Exterminators, Inc.
c/o
Pyxis Regulatory Consulting, Inc.
4110 136th St. Ct. NW
Gig Harbor, WA 98332

Subject: Label Amendment – Adding cropland to the use restrictions, revising baiting directions, other minor label changes
Product Name: Pocket Gopher Bait Containing Strychnine 1-10 Formulation on Oats
EPA Registration Number: 4271-10
Application Date: 04/18/2022
Decision Number: 585554

Dear Ms. Shorey:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. This approval does not affect any conditions that were previously 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. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, 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 FIFRA 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) lists 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

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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, please contact Jasmin Jackson at 202-566-2797 or at Jackson.Jasmin@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gene Benbow".

Gene Benbow, Product Manager 7
Invertebrate & Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

{Note to reviewer: [Text] in brackets denotes optional text. {Text} in braces denotes where in the final label text will appear and notes to reviewer.}

{CENTER PANEL}

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:	% BY WT.
STRYCHNINE.....	0.5%
INERT INGREDIENTS.....	99.5%
TOTAL.....	100.0%

KEEP OUT OF REACH OF CHILDREN



FIRST AID

IF SWALLOWED:	<ul style="list-style-type: none"> • CALL A POISON CONTROL CENTER OR DOCTOR 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"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for treatment advice.
IF IN EYES:	<ul style="list-style-type: none"> • Hold eye 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 or doctor for treatment advice.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For medical emergencies, call the poison control center at 1-800-222-1222. For general information on this product, contact the National Pesticides Information Center (NPIC) at 1-800-858-7378, Monday through Friday, 8 AM to 12 PM PST, or at <http://npic.orst.edu>.

[See] [side] [label] [panel][s] [for] [First Aid][,] [additional] [Precautionary Statements][,] [and] [Directions for Use] [including Storage and Disposal] [instructions][,]



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 WEIGHT [10] [25] [50] LBS.

{LEFT PANEL}

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 thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated 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
- A minimum of a NIOSH-approved particulate filtering facepiece respirator with an 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 a HE filter.

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

USER SAFETY RECOMMENDATIONS

Users should:

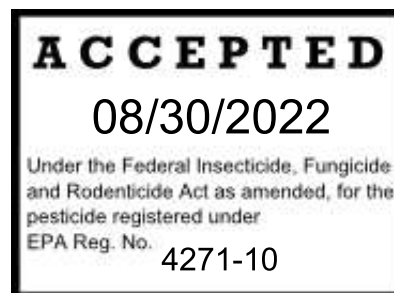
- Remove clothing/PPE immediately if pesticide gets inside. Then, wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of waterproof gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

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.



DIRECTIONS FOR USE

RESTRICTED USE PESTICIDE

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 pocket gophers (*Cratogeomys* spp., *Geomys* spp., *Pappogeomys* spp., and *Thomomys* spp., [except the Mazama pocket gopher (*Thomomys mazama*) in Thurston and Pierce counties Washington.]) in forests, orchards, alfalfa fields, hay fields, pastures, rangelands, noncrop areas, and cropland. 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

LOCATING RUNWAYS

To locate a gopher's natural runway, probe about 6" to 8" from an active mound, beginning on the flat side of the horseshoe-shaped depression. Using an iron bar, a strong stick, a bait-dispensing probe, or other suitable implement, probe 8" to 10" below soil level. Soil resistance on the probe will decrease when runway is entered.

CLOSING PROBE HOLES

After bait placement has been made, cover opening with sod or dirt to close hole and exclude light. Do not permit dirt to sift in and cover bait.

TREATMENT RATE

Depending upon pocket gopher population levels, one pound of bait applied manually will treat one to eight acres.

HAND BAITING

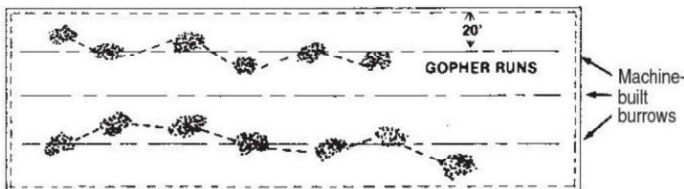
Bait must be placed into pocket gopher runways. Remove burrow plug from the flat side of the burrow fan. Using a long-handled spoon, insert one teaspoon of bait into the main runway system. Make 2-7 bait sets per burrow system, depending on the system's apparent length. Close probe holes as indicated above.

BAIT-DISPENSING PROBE APPLICATION

Read manufacturer's instructions for the equipment selected for use. Determine how to calibrate equipment or otherwise ensure that each bait placement will be approximately one teaspoonful. Locate the main underground runway through probing, as indicated under LOCATING RUNWAYS. When probe is in the main runway, operate the dispenser to release bait into tunnel. Pick up or bury any spilled bait immediately. Make 2 to 7 bait sets per burrow system, depending upon the system's apparent length. Close probe holes as indicated above.

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 3 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.



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. Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then offer for recycling if available or dispose of empty bag in a sanitary landfill or by incineration.

{RIGHT PANEL}

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][LOT] CODE_____]