300/17

March 22, 2004

Ms. Irene Boone, CHMM Agent for RCO, Inc. Regulatory Services, Inc. 17220 Westview Road Lake Oswego, OR 97034

Dear Ms. Boone

Subject:

RCO ΩMEGA GOPHER GRAIN BAIT

EPA Reg. No. 5042-32

Your Submission of February 26, 2004

The proposed revised label with "occupational use" language that you submitted for 24-ounce, 5-lb, 15-lb, and 50-lb containers of this product is acceptable <u>provided</u> that the diagram inserted into the "**DIRECTIONS FOR USE**" section corresponds to the diagram used on the label that we accepted when this product was reregistered on May 5, 2003. The label text that we accepted on that date for the 6-ounce package of 5042-32 remains current and must continue to be used for that container size.

Submit one copy of the final printed label for larger containers and one copy of the final printed label for the 6-ounce container before releasing the product for shipment. Note that you were required by our letter of May 5, 2003, to submit such labels and that we have not received them.

If you have questions about this letter you may reach me by telephone (703-305-6406), by FAX (703-305-6596), or by E-Mail (jacobs.bill@epa.gov).

Sincerely,

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William W. Jacobs, Ph.D. Insecticide-Rodenticide Branch Registration Division (7505C)

FRONT PANEL-Rev. agricultural label 6/03

RCO OMEGA GOPHER GRAIN BAIT

GRAIN BAIT FOR POCKET GOPHERS

ACTIVE INGREDIENT:

 Strychnine Alkaloid
 .0.50%

 INERT INGREDIENTS:
 .99.50%

 TOTAL
 100.00%

KEEP OUT OF REACH OF CHILDREN

DANGER

POISON (Red skull and crossbones)

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 the 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, gently 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

Administer 100% OXYGEN by positive pressure to provide as much pulmonary gas exchange as possible, despite seizures. 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 OTHER SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

Manufactured by: Rodent Control Outfitters, Inc.

EPA Reg. No. 5042-32

PO Box 191, Harrisburg, OR 97446

EPA Est. No. 67442-OR-2

NET CONTENTS: 24 oz., 5 lb., 15 lb., 50 lb.

PRECAUTIONARY STATEMENT HAZARD 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 other handlers must wear:

- -long-sleeved shirt and long pants
- -cotton gloves
- -shoes plus socks

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
- -dust/mist filtering respirator (NIOSH/MSHA approval number prefix TC-21C), or a NIOSH approved respirator with and N, P, R, or 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.

Users should 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.

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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 the cleaning of equipment or disposal of wastes. Do not apply directly to food or feed crops.

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: California condor, San Joaquin kit fox, Morrow Bay kangaroo rat, gray wolf and grizzly bear.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal PESTICIDE STORAGE: Store excess materials in original labeled container in a cool, dry area. Do not stack containers more than three high. Rotate containers end to end at least once a month. Keep containers away from children, pets and domestic animals. Avoid contamination of other pesticides, fertilizers, food and feed.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, 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 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. If burned, stay out of smoke.

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 be used only in manual, subterranean applications in terrestrial food crops, and terrestrial nonfood and forestry areas to control the following species of pocket gophers: Northern (Thomomys talpoides), Southern (Thomomys umbrinus), Camas (Thomomys bulbivorus), Valley (Thomomys bottae), Mazama (Thomomys mazama), Plains (Geomys bursarius), Mountain (Thomomys monticola), and Townsend's pocket gophers (Thomomys townsendii).

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Bait must be deposited in pocket gophers' underground runways. Do not apply bait above ground. Do not apply this product by mean of a burrow-builder machine. Do not apply this product over food or feed crops. Do not expose baits in a manner which presents a hazard to humans, pets, poultry, or livestock. Keep pets, domestic animals, and people not involved with the application out of the treatment area while product is being applied.

BAITING: Burrowing pocket gophers throw out low, fan-shaped dirt mounds on either side of their underground runways. Short lateral tunnels connect the mounds to the main runway. Except when a pocket gopher is throwing out dirt, its lateral tunnels are plugged with soil at the mound, often creating a horseshoe-shaped depression. Pocket gophers may be controlled by placing bait in the main runway, after gaining access by removing plugs in lateral tunnels or by probing soil to locate the main runway.

(INSERT DIAGRAM HERE)

Lateral Tunnels: With a long-handled spoon or other suitable tool, carefully remove dirt plug. Insert a teaspoonful of bait at the junction of the lateral tunnel and the main runway. Re-close hole, taking care to exclude light and not to allow soil to cover bait. Pick up and properly dispose of any spilled bait.

Probing: With a metal rod or other suitable implement, probe soil 6 to 8 inches around mound, starting from plug side, to locate main runway. When runway is entered, resistance on probe will decrease abruptly. Remove probe and insert a teaspoonful of bait through probe hole (enlarged if necessary). Cover opening with a rock, a clump of soil, or other object that will exclude light. Take care not to permit dirt to cover bait. Pick up and properly dispose of any spilled bait.

Application Rate: Make two to five sets per burrow system, depending upon its apparent size. Depending upon pocket gopher density, one pound of bait will treat one to eight acres.

NOTICE: Because RCO Inc. has no control over storage, handling and conditions of use, which are of critical importance, RCO Inc, makes no representation of warranty, either expressed or implied, for results due to misuse, improper handling or storage of this material. Not does RCO Inc. assume any responsibility for injury to persons, crops, animals, soil or property arising out of misuse, improper handling or storage of this material.