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SEP 15 2004

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

Dear Ms. Boone:

Subject: RCO Omega Gopher Grain Bait
EPA Registration No. 5042-32
Your Submission Dated April 7, 2004

The label proposed for 6-ounce and 16-ounce containers of this product is acceptable. A few minor changes must be made when labels are printed. These changes are enumerated below.

1. Change "gently" to "gentle" in the first sentence of the "**IF IN EYES:**" paragraph in the "**FIRST AID**" section.
2. In the "**DIRECTIONS FOR USE**", change "mean" to "means" in the third sentence of the second paragraph under "**USE RESTRICTIONS:**".
3. The last "sentence" of the "**NOTICE:**" (disclaimer) paragraph has grammatical problems. These can be fixed by changing "Not does RCO Inc. assume" to "RCO Inc. does not assume".

Submit one copy of the final printed label for the 6-ounce and 16-ounce packages before releasing this product for shipment (in containers of those sizes).

Sincerely yours,



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

FRONT PANEL-Rev. homeowner use label 6-03
(16 oz. size added 4/04)

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.

REMOVED
with COMMENTS
on EPA Label Dates
SEP 15 2004
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the product
registered under EPA Reg. No.
5042-32

SEE OTHER SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

Manufactured by: Rodent Control Outfitters, Inc.
PO Box 191, Harrisburg, OR 97446

EPA Reg. No. 5042-32
EPA Est. No. 67442-OR-2

NET CONTENTS: 6 oz., 16 oz.

**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, and
-shoes plus socks.
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. 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 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 only in original container, in a dry place inaccessible to children, pets and domestic animals.

PESTICIDE DISPOSAL: Recover any spilled product. Securely wrap in several layers of newspaper, and discard in trash.

CONTAINER DISPOSAL: Securely wrap original container in several layers of newspaper and discard in trash.

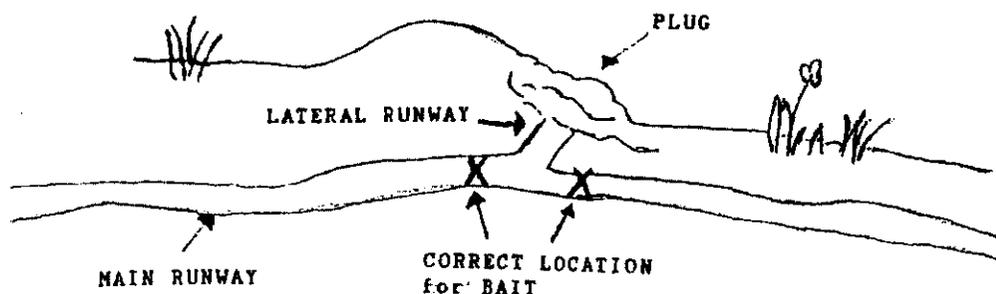
DIRECTIONS FOR USE

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*).

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.



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.