

5042-32

7/29/2008

Page 1 of 10  
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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

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OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

**JUL 29 2008**

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

Dear Ms. Boone:

Subject: Omega Gopher Grain Bait  
EPA Registration Number 5042-32  
Your Submission dated May 9, 2008

The label for the 6-oz and 16-oz size and the "agricultural" size label for the product referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, are acceptable, subject to the editorial comment that appears below this paragraph. Submit two (2) copies of the final printed label before you release the product for shipment bearing the revised labeling.

In the first sentence of the "NOTICE:" paragraphs on page 4 of both draft labels, change "RCO Inc," to "RCO International, Inc." when labels are printed.

Stamped copies of the label are enclosed for your records.

If you have any questions regarding this letter, you may reach me by phone at 703-305-6406, by FAX at 703-308-0029, or via e-mail at [jacobs.bill@epa.gov](mailto:jacobs.bill@epa.gov).

Sincerely yours,

A handwritten signature in black ink, appearing to read "William W. Jacobs".

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

2 8 10

ACCEPTED  
With COMMENTS  
In EPA Letter Dated:

JUL 29 2008

Under the Federal Insecticide, Fungicide  
and Rodenticide Act, As amended, for the  
pesticide Registered under EPA Reg. No:

5042-32

FRONT PANEL-Rev. non ag label- 6 oz and 16 oz. sizes  
5/08 submission

## 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, 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

Administer 100% OXYGEN by positive pressure to provide as much pulmonary gas exchange as possible, despite seizures. Administer ANTICONSULSANT 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: RCO International, Inc.  
PO Box 191, Harrisburg, OR 97446

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

NET CONTENTS: 6 oz., 16 oz.

3 8 10

**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. Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**CONTAINER DISPOSAL:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available, or place in trash.

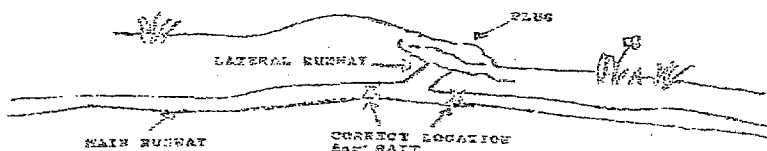
**DIRECTIONS FOR USE**

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 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 means 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.



Page 4- Rev. non ag label- 5/08 submission

**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. RCO Inc. does not assume any responsibility for injury to persons, crops, animals, soil or property arising out of misuse, improper handling or storage of this material.

6 8 10

FRONT PANEL-Rev. agricultural label 5/08

ACCEPTED  
With COMMENTS  
In EPA Letter Dated:  
JUL 29 2008

Under the Federal Insecticide, Fungicide  
and Rodenticide Act, As amended, for the  
EPA Reg. No. 5042-32

**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, 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**

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: RCO International, Inc.  
PO Box 191, Harrisburg, OR 97446

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

NET CONTENTS: 5 lb., 15 lb., 30 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.

### 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

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### 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:** Nonrefillable 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. If burned, stay out of smoke.

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Mazama (*Thomomys mazama*), Plains (*Geomys bursarius*), Mountain (*Thomomys monticola*), and Townsend's pocket gophers (*Thomomys townsendii*).

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Page 5 – Rev. ag. label 5/08

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