

5042-33

04/20/2011

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Decision # 447995

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

360 5-894261
1155

RCO International, Inc.
c/o Regulatory Services Inc.
17220 Westview Road
Lake Oswego, OR 97034

APR 20 2011

Attention: Ms. Irene Boone

Subject RCO Mole & Gopher Patrol Bait
EPA Reg. No. 5042-33
Your resubmission of April 12, 2011

Purpose This submission includes revised labels to comply with the Risk Mitigation Decision of May 28, 2008, under sec 3(c)(5) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and current requirements.

Label The labeling submitted with the above letter is acceptable, provided you submit one (1) copy of final printed labeling to us, before you ship your product.

Follow the enclosed "Minimum Type Size Requirements for Final Printed Label".

CSF The acceptable Confidential Statement of Formula (CSF) for this product is dated February 15, 2007 (Basic Formulation). All other versions are obsolete.

Compliance with Risk Mitigation and RED With this accepted labeling, the product meets the risk management goals of the Reregistration Eligibility Decision (RED) for the 1998 Rodenticide Cluster and the Risk Mitigation Decision for Ten Rodenticides (RMD).

- Existing stocks**
- The registrant may not distribute or sell existing stocks of this product after June 4, 2011 unless they conform to the terms and conditions of registration as amended today.
 - Any person other than the registrant may sell and distribute existing stocks of this product with the previously approved label until such stocks are exhausted.
 - Any person may use existing stocks of this product with the previously approved label until such stocks are exhausted.

Consequence for non-compliance If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Questions If you have questions about this letter, please contact me at 703-305-5407 (phone); 703-305-6596 (fax); or peacock.dan@epa.gov (E-Mail).

Sincerely,



Rosanna Louie-Juzwiak
 Acting Product Manager (07)
 Insecticide-Rodenticide Branch
 Registration Division (7505P)

- Enclosures**
1. Stamped Label
 2. Minimum Type Sizes for Final Printed Label

File Location Dan Peacock, C:\Documents and Settings\dpeacock\Desktop\Backup, 16gb Flash Drive\Diphacinone\Registration Actions\5042-33\5042-33, 4-12 resub, re-reg + RMD. 4-13-2011.doc

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005042-00033.20110412

(Master label: 4-12-11 label amendment)

RCO MOLE & GOPHER PATROL BAIT

This product may only be used to control moles and pocket gophers in manual, below-ground applications.

Bait to Control Moles and Gophers

ACTIVE INGREDIENT: Diphacinone.....	ACCEPTED.....	0.005%	APR 20 2011
INERT INGREDIENT:.....		99.995%	
TOTAL		100.000%	

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under:

KEEP OUT OF REACH OF CHILDREN
CAUTION

See back panel for additional precautionary statements.

EPA. Reg. No: 5042-33

RCO INTERNATIONAL INC.
P.O. Box 191, Harrisburg, OR 97446

EPA REG. NO. 5042-33 EPA EST. NO. 67442-OR-2

NET WEIGHT: Homeowner sizes: 8 oz., 1 lb.,
 Non-homeowner size: 4 lb., 5 lb., 15 lb., 20 lbs., 25 lb

BATCH CODE:

(SUBLABEL A: HOMEOWNER LABEL)

RCO MOLE & GOPHER PATROL BAIT

This product may only be used to control moles and pocket gophers in manual, below-ground applications.

Bait to Control Moles and Gophers

Intended for Residential Use

ACTIVE INGREDIENT: Diphacinone.....	0.005%
INERT INGREDIENT:.....	99.995%
TOTAL	100.000%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional precautionary statements.

RCO INTERNATIONAL INC.
P.O. Box 191, Harrisburg, OR 97446

EPA REG. NO. 5042-33 EPA EST. NO. 67442-OR-2

NET WEIGHT: 8 oz., 1 lb.

BATCH CODE:

BACK PANEL :

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Keep away from children, domestic animals and pets.

Anyone handling baits or retrieving carcasses must wear waterproof gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

FIRST AID

Have label with you when obtaining treatment advice.

If swallowed	<ul style="list-style-type: none"> • Call poison control center, doctor, or 1-800-222-1222 immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor.
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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, doctor, or 1-800-222-1222 immediately for treatment advice.
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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, doctor, or 1-800-222-1222 immediately for treatment advice.
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TREATMENT FOR PET POISONING

If animal eats bait, call veterinarian at once.

NOTE TO PHYSICIAN OR VETERINARIAN

Anticoagulant Diphacinone: If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. **For humans or dogs** that have ingested this product and/or have obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K₁ intramuscularly or orally.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to mammals and birds. Dogs, cats and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that

have eaten this bait. Do not apply directly to water. Do not contaminate water when disposing of equipment wash water or rinsate.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store only in the original container, in a dry place inaccessible to children and pets.

PESTICIDE DISPOSAL: Nonrefillable container. Do not reuse or refill this container.

If empty: Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product by any method not specified on this label.

IMPORTANT: Do not expose children, pets, or other non-target animals to rodenticides.

To help prevent accidents:

1. Store product not in use in a location out of reach of children and pets.
2. Apply bait in locations out of the reach of children, pets, domestic animals and non-target wildlife.
3. Dispose of product container, and unused, spoiled and unconsumed bait as specified on the label.

USE RESTRICTIONS

This product may only be applied at the use sites and by the application methods indicated on this label. Bait must be applied directly into mole and pocket gopher burrow systems.

This product may be used around homes to control eastern moles (*Scalopus aquaticus*); the star-nosed moles (*Condylura cristata*); or *Scapanus spp.*, moles that occur in the western U.S.; and pocket gophers (*Geomys.sp* and *Thomomys sp.*) This bait must be applied under ground in moles and gopher deep tunnels or subsurface runways. Do not place this bait in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food. Do not apply bait above ground. Remove or bury any bait spilled on the ground during application. Several treatments may be necessary to control mole and gopher infestations. Follow separate application directions on this label for moles and gophers.

DIFFERENCES between MOLES and GOPHERS

Moles are insectivores whose diet is primarily worms and soft bodied insects. They put up large mounds that are conical and very cloddy. Certain mole species will leave "ridged" runways near the soil surface. Gophers are vegetarians and prefer succulent plant roots. They put up random low fan-shaped mounds of finely excavated soil. Moles and gophers can be active year round.

MOLE APPLICATION DIRECTIONS

SUBSURFACE RUNWAYS: Subsurface runways are detected as raised ridges of vegetation and soil caused by moles foraging just below the soil surface. These ridges are especially noticeable when the grass on top of them yellows.

As many subsurface runways are used only once, you must determine which runways are habitually used by moles and apply bait only to these runways. To check subsurface runways for continued activity, gently flatten short sections of runways, marking locations where runways have been flattened so that you will know where to look for reconstruction of the ridge. Flagging on short stakes or dowels works well for this purpose, but make sure these are located beside (rather than in) the runways marked. Runways that are reconstructed within 72 hours of flattening may be sufficiently active to use for baiting.

Apply bait to each active runway identified. Using a 1/2-inch diameter dowel or metal rod (or other suitable implement) make a small opening in the top of the runway. Deposit a teaspoon quantity (about 4 grams) of bait through the hole, taking care not to collapse the ridge of the runway. (Move to a new location if ridge collapses). Carefully re-close the hole so that extra light is excluded, but no soil falls on bait and ridge is not collapsed. A small piece of sod or wadded paper towel may be used to reclose holes. Bait each active subsurface runway at 10- to 15-foot intervals. Check treated area often for signs of continued activity by moles. Re-treat areas where fresh activity is seen.

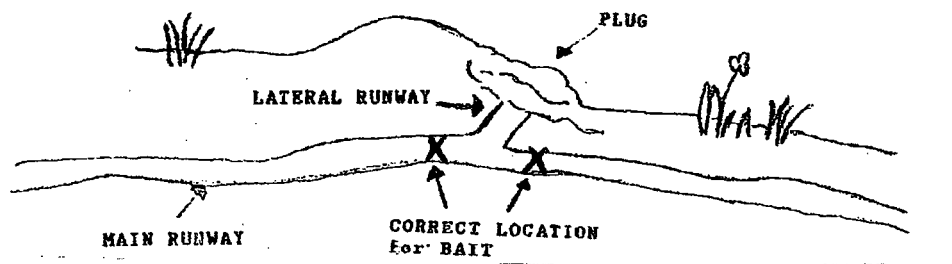
CONICAL MOUNDS and DEEP TUNNELS: Moles also may construct deeper tunnel systems, 4-6 inches below the ground surface. Such deeper tunnel systems are betrayed by the presence of conical mounds, sometimes 4-12 inches high, which are formed when moles push excavated soil up to the surface. Adjacent conical mounds often are only a few feet apart. The tunnel running between adjacent mounds may be found by probing the soil between mounds. Resistance on the probe decreases abruptly once the tunnel is entered.

To bait deeper tunnels, probe until a tunnel is located. Enlarge the probe hole as needed to accommodate the passage of bait. Apply a teaspoon amount (about 4 grams) of bait into the tunnel. Cover the probe hole with sod, a small rock, or wadded paper to Take care not to allow soil to cover bait. Treat each apparent length of deep tunnel. Several days after treatment, check deep tunnels for continued presence of moles by probing openings into tunnels and marking them with flagged stakes inserted into the soil beside the opening. Re-treat all deep tunnels whose openings are reclosed from within during the next 72 hours.

POCKET GOPHER APPLICATION DIRECTIONS

Pocket Gophers form many low, fan-shaped mounds from their below ground tunnel excavations. Their entrance is on the mound's edge that is usually plugged. A short below-ground lateral tunnel connects the mound to the main runway, typically within 18" of the mound. To locate the main tunnel, probe the soil about 6-8" out from the mound in a circular pattern with a rod-like device. The probe will "give way" as the tunnel is penetrated. Remove probe after enlarging the opening by using rod in circular motion.

APPLICATION: Method 1: Apply $\frac{1}{2}$ cup of bait down the enlarged hole. Carefully close hole with sod or similar material to prevent light from entering and also to keep soil debris from falling down on bait. Make 2-3 applications per active burrow system. Re-treat if fresh mounds appear after 2 to 3 weeks. Method 2: Enlarge located tunnel to allow for placement of bait using a long handled spoon. Apply $\frac{1}{4}$ cup of bait in both directions down tunnel. Close baiting hole as directed above. Also, treat in 2-3 locations per tunnel system. Repeat as recommended above if fresh mounds appear. Method 3: -Bait Station Use: Utilize an approved below ground bait station by burying unit into an active tunnel system. Align bait station openings with tunnel runways. Load 1 lb. of bait into buried station and monitor bait consumption. Add bait to station as necessary. Always bait in the main tunnel system, not laterals (see below Diagram). Monitor the baiting stations for tunnel rebuilding that may bury the placed bait. Re-bait in other sites within the same tunnel system.



NOTICE: To the extent consistent with applicable law, RCO International, Inc. makes no representation or warranty, either expressed or implied, for results due to misuse, improper handling or storage of this material. Nor does RCO International, Inc. assume responsibility for injury to person, crops, animals, or soil or property arising out of misuse, improper handling or storage of this material.

SUBLABEL B: NON-HOMEOWNER LABEL

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Bait to Control Moles and Gophers

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TOTAL	100.000%

KEEP OUT OF REACH OF CHILDREN

CAUTION

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NET WEIGHT: 4 LB., 5 LB., 15 LB., 20 LB., 25 LB.

BATCH CODE:

BACK PANEL :

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Keep away from children, domestic animals and pets.

Wear long-sleeved shirt, long pants, shoes, socks, and water-proof gloves. Any person who retrieves carcasses or unused bait following application of this product must wear waterproof gloves.

User Safety Requirements

Follow manufacturer's instruction for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet and change into clean clothing.

FIRST AID

Have label with you when obtaining treatment advice.

If swallowed	<ul style="list-style-type: none"> • Call poison control center, doctor, or 1-800-222-1222 immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor.
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Environmental Hazards

This product is extremely toxic to mammals and birds. Dogs, cats and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait.

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 when disposing of equipment wash water or rinsate.

ENDANGERED SPECIES CONSIDERATIONS

NOTICE: It is a federal offense to use any pesticide in a manner that results in the death of a member of an endangered species. The use of this product may pose a hazard to Federally designated endangered/threatened species.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store only in original container in a cool, dry place inaccessible to children and pets. Keep containers closed and away from other chemicals.

Pesticide Disposal: Wastes resulting from the use of this product may be placed in trash or delivered to an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container.

[Plastic]: Triple rinse (or equivalent). Then offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill, or by incineration.

[Paper]: Dispose of empty container by placing in trash, at an approved waste disposal facility or by incineration.

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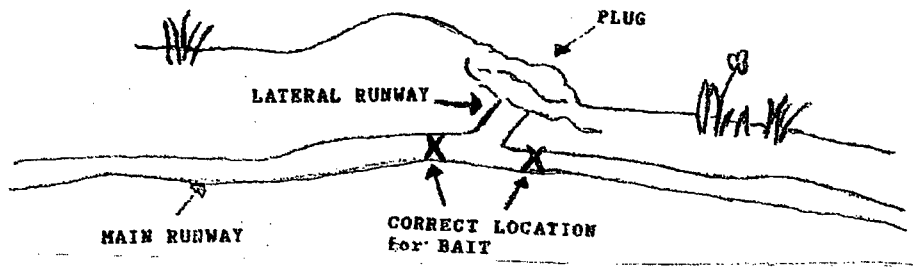
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NOTICE: To the extent consistent with applicable law, RCO International, Inc. makes no representation or warranty, either expressed or implied, for results due to misuse, improper handling or storage of this material. Nor does RCO International, Inc. assume responsibility for injury to person, crops, animals, or soil or property arising out of misuse, improper handling or storage of this material.