
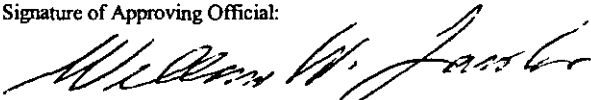


5042-34

05-17-2007

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	<p align="center">U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division (7505P) Ariel Rios Building 1200 Pennsylvania Ave., NW Washington, D.C. 20460</p>	EPA Reg. Number: 5042-34	Date of Issuance: MAY 17 2007
		Term of Issuance: CONDITIONAL	
NOTICE OF PESTICIDE: <input checked="" type="checkbox"/> Registration <input type="checkbox"/> Reregistration (under FIFRA, as amended)		Name of Pesticide Product: RCO AVALON MIXED GRAIN GOPHER BAIT	
Name and Address of Registrant (include ZIP Code): Mr. Douglas Freeman RCO International, Inc. P.O. Box 191 Harrisburg, OR 97446			
Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.			
<p>On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.</p> <p>This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you respond appropriately to the items enumerated below.</p> <ol style="list-style-type: none"> 1. Submit data on Storage Stability (GRN 830.6317) and Corrosion Characteristics (GRN 830.6320) within 18 months of the date of this letter (i.e., by November 17, 2008). 2. The label submitted on March 13, 2007, is acceptable provided that the changes identified below are made. <ol style="list-style-type: none"> a. Change "EPA Reg. No. 5042-xx" to "EPA Reg. No.: 5042-34". b. Change "EPA Est. No. 67442-OR-2" to "EPA Reg. No.: 67442-OR-2" (i.e., insert a colon where indicated). c. In the first paragraph of the "USE RESTRICTIONS" subsection of the "DIRECTIONS FOR USE", change "<i>Geomys</i> spp. ." to "<i>Geomys</i> spp." (i.e., delete the second period). 			
Signature of Approving Official: 		Date: MAY 17 2007	

- d. Change "its'" to "its" (i.e., delete the apostrophe) in the second sentence of the "Locating Runways:" paragraph (under "APPLICATION DIRECTIONS FOR MANUAL BAITING" in the "DIRECTIONS FOR USE" section.
- e. Change the next-to-last sentence of the "Locating Runways:" paragraph to read as shown immediately below.

To locate a gopher's main runway, probe around 6 to 8 inches around the mound, starting on the plugged side.

As proposed, the sentence contains a redundancy.

- f. The heading for the "Monitoring Pocket Gopher Activity:" paragraph should be in boldface type (i.e., "Monitoring Pocket Gopher Activity") so that it is parallel to the other paragraph headings under "APPLICATION DIRECTIONS FOR MANUAL BAITING".
3. Submit two copies of the revised final printed label for our records. Note that the label arrangement on your 5042-32 product which involves one panel of label text placed over and glued to another panel is not appropriate for Strychnine Alkaloid products and may not be used for this product. We will contact you separately regarding the phasing out of the current labeling arrangement for 5042-32.

The Confidential Statement of Formula (CSF) dated "11-10-06" is acceptable and describes the only formulation that may be used for EPA Reg. No. 5042-34. The information provided regarding beginning materials, formulation process, formation of impurities, certified limits, and the enforcement analytical method also is acceptable.

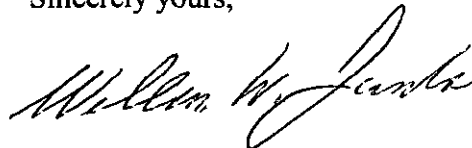
This product is registered only for subterranean applications to control *Geomys* spp. and *Thomomys* spp. pocket gophers on "rangelands, pastures, croplands, forests, and non-agricultural areas." Collectively, these organisms are reported to occur in the following States: Alabama, Arizona, Arkansas, California, Colorado, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Louisiana, Minnesota, Missouri, Montana, Nebraska, Nevada, New Mexico, North Dakota, Oklahoma, Oregon, South Carolina, South Dakota, Texas, Utah, Washington, Wisconsin, and Wyoming. These are the States where use of this product would be legal under FIFRA (if also registered within the individual States) and, therefore, the only States in which it should be sold.

If you fail to comply with the conditions indicated above, this product's registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release of this product for shipment constitutes acceptance of these conditions.

A stamped copy of the accepted label is enclosed for your records. Note that label revisions and additional data might be required when registration review is conducted for Strychnine Alkaloid.

If you have questions regarding this letter, you may contact me by telephone at 703-305-6406, by FAX at 703-308-0029, or by e-mail at jacobs.bill@epa.gov.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "William W. Jacobs".

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

cc: Irene Boone, Agent for RCO International, Inc.

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(FRONT PANEL-rev 3-07)

RESTRICTED USE PESTICIDE
DUE TO HAZARD TO NONTARGET ORGANISMS
 For retail sale to and use only by Certified Applicators or persons under the direct supervision of a Certified Applicator, and only for those uses covered by the Certified Applicator's certification.

RCO AVALON
MIXED GRAIN GOPHER BAIT

For MECHANICAL BURROW BUILDER & MANUAL APPLICATIONS

MAY 17 2007
 5042-34

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)
PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand label, then find someone to explain label in detail before using this product.)

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.

In case of accidental injection or concerns with possible non-target injection, please have product label available when contacting a poison control center or doctor, or going for treatment. The National Pesticide Information Center can also be reached for emergency treatment information at 1-800-858-7378.

SEE LEFT SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

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

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

NET CONTENTS: 5 lb, 15 lb., 30 lb, & 50 lb.

(Left Side 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 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) or loading of more than 3 lbs. of bait into mechanical application equipment, 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.

(Side panel continued)

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.

(Right side panel)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

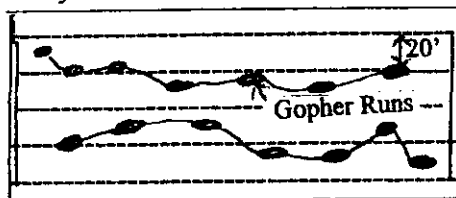
USE RESTRICTIONS:

This product may only be used in below-ground (only) applications in rangelands, pastures, croplands, forests, and non-agricultural areas to control the following types of pocket gophers: *Thomomys* spp. and *Geomys* spp. .

This product may only be applied by use of a tractor-operated mechanical burrow builder, by probe-assisted hand-held bait dispensers, or by standard manual hand baiting techniques, as prescribed on this label. Bait must be deposited directly into the pocket gopher's natural below ground tunnels or into an artificial underground tunnel created by the burrow-builder unit. Always check for uniform closure of tunnel created by the burrow-builder unit press wheel. A poorly made tunnel is no tunnel to a gopher. Never apply this bait above ground or for any purpose other than as directed by this product label. Do not apply this product over food or feed crops. Do not apply this product in a way that it will contact workers, other individuals and domestic animals or wildlife. Keep pets out of area when baiting. See baiting directions below.

APPLICATION DIRECTIONS FOR BURROW BUILDERS:

Burrow builders construct artificial underground tunnels and automatically place bait into them in a single operation. A coulter disc opens the way for a subsoiler shank. At the bottom of the shank is a pointed tube or "torpedo". The torpedo creates the artificial burrow. Bait is dropped in preset quantities through an outlet in the rear underside of the torpedo. Close-set rubber tire or tires behind the subsoiler shank close the cut soil above the burrow. Always consult the manufacturer's directions for the specific burrow builder equipment to be used. Adjust the torpedo to the average depth of pocket gopher runways. Make sure that soil is damp enough to hold formed tunnels. Cut artificial burrows at 20 to 25 foot intervals. Orient artificial burrows to intercept gophers' natural underground runways (See diagram). Pick up or bury any spilled bait. Apply at rates of one to three pounds of bait per acre by the burrow-builder method.



Treatment indicated by dotted lines

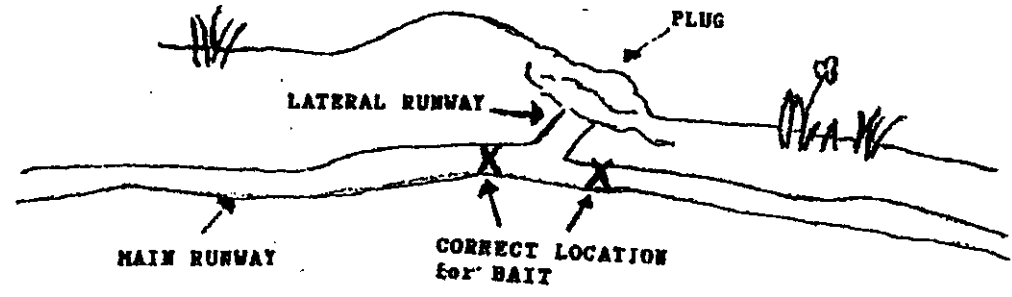
APPLICATION DIRECTIONS FOR MANUAL BAITING:

Locating Runways: 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 it is located through probing around the mound (see diagram below). To locate a gopher's natural tunnel runway, probe

about 6-8 inches around mound, starting from the plugged side, to locate main runway. When runway is entered, resistance on probing device will decrease abruptly.

Hand Application: After locating the main tunnel system, remove probe and enlarge the probe hole, if necessary, to accommodate the depositing of bait (see diagram below). Drop a teaspoonful of bait through probe opening, taking care not to spill bait on soil surface. Make 2-7 below-ground placements of bait per active tunnel system, based upon the apparent length of the visible tunnel system. Cover opening with a rock, clump of soil or other objects that will exclude light. Take care not to permit dirt to fall down and cover bait. Pick up and properly dispose of any spilled bait.

Applications with Hand-operated Bait-dispensing Equipment: Always refer to the instructions for the specific equipment being used. Set the equipment so that each bait placement will be approximately one teaspoonful. Place bait in the main underground runway (see diagram below). Refer to the directions for **Locating Runways:** (above) for proper techniques to locate main tunnel system. Make 2-7 bait placements throughout active tunnel system, based upon the apparent length of the visible tunnel system. Cover the baited openings with a rock, clump of soil or other objects that will exclude light. Take care not to permit dirt to fall down and cover bait. Pick up and properly dispose of any spilled bait.



Treatment Rates for Manual Applications: When applied as directed above, one pound of bait will treat from one to eight acres, depending upon the density of pocket gopher activity.

Monitoring Pocket Gopher Activity: One pocket gopher may construct up to 3 mounds per day and over 200 mounds per year. Check burrow systems for current activity by opening main runways and/or by flattening all mounds. Mark disturbed burrows with flagging and return to the site approximately 48 hours later. Where there are live pocket gophers, opened tunnels will be repaired and new mounds may be constructed. These procedures may be used before treatment to monitor the initial level of pocket gopher activity and after treatment to assess the results of the treatment and to determine whether and where follow-up treatments are needed.

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.