



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

January 3, 2020

Douglas Freeman  
RCO International, Inc.  
PO Box 191  
Harrisburg, Oregon 97446

Subject: Addition of PF10 respirator to strychnine labels as required by the EPA letter dated July 19, 2019  
Product Name: RCO Avalon Mixed Grain Gopher Bait  
EPA Registration Number: 5042-34  
Application Date: 08/08/2019  
Decision Number: 554693

Dear Mr. Freeman:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. You are permitted to sell or distribute products under the previously approved labeling for a period of 18 months from the date of this amendment. After this 18-month period, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6.

If you have any questions about this letter, please contact Srijana Shrestha by phone at 703-305-6471, or via email at [Shrestha.srijana@epa.gov](mailto:Shrestha.srijana@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington".

Linda Arrington, Branch Chief  
Risk Management and Implementation Branch 4  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs

Enclosure

**ACCEPTED**

Jan 03, 2020

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 5042-34

FRONT PANEL- Rev. agricultural label 09/19

**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

**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 them 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 ingestion or concerns with possible non-target ingestion, 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. EPA Reg No.: 5042-34  
PO Box 191 EPA Est. No.: 67442-OR-2  
Harrisburg, Oregon 97446

NET CONTENTS: 5 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-sleeve shirt and long pants
- cotton gloves
- shoes plus socks
- wear a minimum of a NIOSH-approved particulate filtering face piece respirator with any R or P filter; OR a NIOSH-approved elastomeric particulate respirator with any R or P filter; OR a NIOSH-approved powered air purifying respirator with HE filters.

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-sleeve shirt and long pants
- waterproof gloves
- shoes plus socks
- goggles or face shield, and
- wear a minimum of a NIOSH-approved particulate filtering face piece respirator with any R or P filter; OR a NIOSH-approved elastomeric particulate respirator with any R or P filter; OR a NIOSH-approved powered air purifying respirator with HE filters.

Follow manufacturer's instructions for cleaning and maintaining PPE. If there are no such instructions, use detergent and hot water. Keep and wash PPE separate 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 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 reinstatement 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:** Non refillable 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.

(Right side panel)

### DIRECTIONS FOR USE

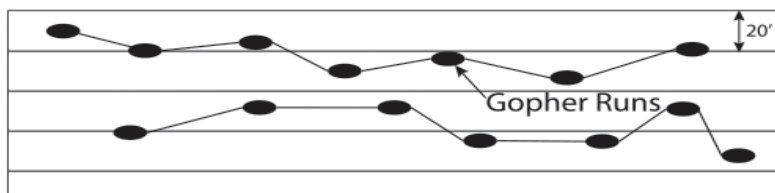
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**USE RESTRICTIONS:** This product may 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 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 burrow. Always check for uniform closure of tunnel created by the burrow-builder unit press wheel. 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

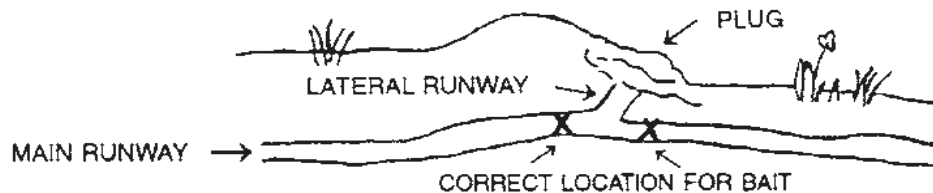
### APPLICATION DIRECTIONS FOR MANUAL BAITING:

**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 the gopher's main runway, probe about 6-8 inches around the mound, starting on the plugged side. 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 hold, 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 over 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 when where follow-up treatments are needed.

**NOTICE:** Because RCO International, Inc. has no control over storage, handling and conditions of use, which are of critical importance, RCO International, Inc. makes no representation of warranty, either expressed or implied, for results due to misuse, improper handling or storage of this material. RCO International, 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.