



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 3, 2020

Douglas Freeman
President
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: Omega Gopher Grain Bait
EPA Registration Number: 5042-32
Application Date: 08/08/2019
Decision Number: 558277

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.

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EPA Reg. No. 5042-32
Decision No. 558277

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 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.

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. 5042-32

FRONT PANEL- Rev. non ag label- 6oz and 16oz sizes 09/19

RCO OMEGA GOPHER GRAIN BAIT

GRAIN BAIT FOR POCKET GOPHERS

ACTIVE INGREDIENT:

Strychnine Alkaloid0.50%

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 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.

SEE OTHER SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

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

EPA Reg No.: 5042-32
EPA Est. No.: 67442-OR-002

NET CONTENTS: 6 oz. and 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.** 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.

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 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: Non refillable container. Do not reuse or refill this container. Offer for recycling, if available, or place in trash.

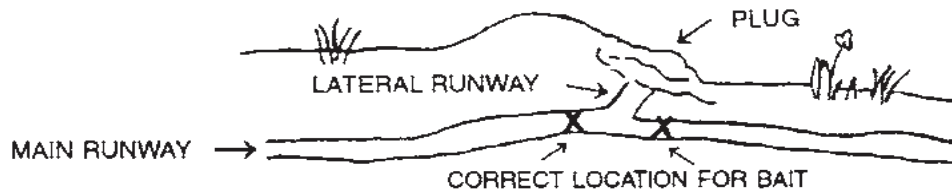
DIRECTIONS FOR USE

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 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 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.



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 on pocket gopher density, one pound of bait will treat one to eight acres.

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. Nor does RCO International, Inc. assume any responsibility for injury to persons, crops, animals, soil or property arising out of misuse, improper handling or storage of this material.

FRONT PANEL- Rev. agricultural label- 5lb, 15lb, 30lb, 50lb sizes 09/19

RCO OMEGA GOPHER GRAIN BAIT

GRAIN BAIT FOR POCKET GOPHERS

ACTIVE INGREDIENT:
Strychnine Alkaloid0.50%
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 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.

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NOTE TO PHYSICIAN

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PO Box 191 EPA Est. No.: 67442-OR-002
Harrisburg, Oregon 97446

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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.** 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) handlers must wear: Long-sleeve shirt and long pants, waterproof gloves, shoes plus socks, goggles or face shield. 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.

ENVIRONMENTAL HAZARDS

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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 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: 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.

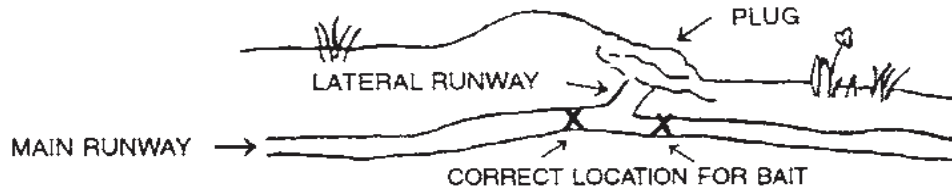
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