

236496  
Record No.

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Review No.  
009901  
Shaughnessey No.

EEB REVIEW

DATE: IN January 5, 1989 OUT February 23, 1989

FILE OR REG. NO. 56228-10

PETITION OR EXP. NO. \_\_\_\_\_

DATE OF SUBMISSION October 28, 1988

DATE RECEIVED BY EFED January 5, 1989

RD REQUESTED COMPLETION DATA March 4, 1989

EEB ESTIMATED COMPLETION DATE March 4, 1989

RD ACTION CODE/TYPE OF REVIEW 305

TYPE PRODUCTS(S): I, D, H, F, N, R, S Avicide

DATA MRID NO(S). \_\_\_\_\_

PRODUCT MANAGER NO. William Miller PMT#16/ Steve Palmateer

PRODUCT NAME(S) Compound DRC-1339 Concentrate (CPT-HCl, Starlicide)

COMPANY NAME USDA/Aphis/Animal Damage Control

SUBMISSION PURPOSE Proposed national §3c2 registration of all state §24c registration label claims.

SHAUGHNESSEY NO.	CHEMICAL AND FORMULATION	% A.I.
<u>009901</u>	<u>CPT-HCl concentrate</u>	<u>97%</u>
_____	_____	_____
_____	_____	_____

234496  
Record No.

009901  
Shaughnessy No.

**EEB REVIEW  
REGISTRATION APPLICATION**

**CPT-HCI  
Compound DRC-1339, Concentrate**

**100. SUBMISSION PURPOSE AND LABEL INFORMATION:**

**100.1 Submission Purpose and Pesticide Use:**

*Applicant-* Animal Damage Control  
Animal and Plant Health Inspection Service  
Denver Wildlife Research Center  
U.S. Department of Agriculture  
Denver, Colorado 80225-0266

*Purpose-* To convert all of the current Special Local Needs (§ 24C) registrations to full registrations (§ 3C2).

**100.2 Formulation Information:**

3-Chloro-p-toluidine hydrochloride	97.0% W/W
Inert Ingredients	<u>3.0</u> 100 %

The chemical is also known as "Starlicide".

**100.3 Application Methods, Rates and Directions for Use:**

*Methods-* A variety of methods, rates and directions are supplied for a variety of use patterns (see the attached label).

**100.4 Target Organisms:**

The listed target species are starlings, crows, magpies, feral pigeons and blackbirds. The species are not given for any of these birds.

**100.5 Precautionary Labeling:**

**HAZARDS TO HUMANS AND  
DOMESTIC ANIMALS  
DANGER**

Harmful if swallowed, inhaled, or absorbed through the skin. Avoid contact with eyes, skin, or clothing. Handle only with protective gloves, clothing, and face mask, or respirator. Wash hands with soap and water after handling.

### ENVIRONMENTAL HAZARDS

This product is toxic to birds. Do not expose in areas accessible to waterfowl, poultry, and other nontarget birds. Keep out of lakes, ponds, streams, tidal marshes, and estuaries. Do not apply where runoff is likely to occur. Do not contaminate water by the cleaning of equipment or disposal of waste.

#### 100.6 Toxicity Data:

The Denver Wildlife Research Center has conducted toxicity tests upon a great variety of animals. They submitted the results for the another registration, they but have not "written-up" the experiments and submitted them for formal review with the exception of three aquatic invertebrate tests that were ruled "invalid". The three invertebrate tests have not been resubmitted since then and DRC was not aware that they had been disapproved (E.W. Schafer, telephone conversion, November 1, 1988).

As of this writing, there is no acceptable toxicity data on invertebrates, fish, birds or (to EEB's knowledge) mammals (such as a white rat LD<sub>50</sub>).

#### 101. HAZARD ASSESSMENT:

##### 101.1 Nontarget Hazards:

EEB is not able to assess the hazard to nontarget animals until toxicity and environmental fate studies have been submitted and approved. At that time it may be decided that field studies are necessary.

##### 101.2 Endangered Species:

EEB is not able to assess the hazard to endangered species until toxicity and environmental fate studies have been submitted and approved. At that time it may be necessary to formally consult with the Fish and Wildlife Service to obtain a biological opinion.

##### 101.3 Adequacy of Toxicity Data:

There is no acceptable toxicity data in EEB's files.

##### 101.4 Adequacy of the labeling:

Some modifications are necessary. See "Conclusions" below.

#### 102. CLASSIFICATION- DRC-1339 is a "Restricted Use Pesticide".

#### 103. CONCLUSIONS:

At a minimum, six acceptable studies must be submitted:

- 1) Avian oral acute LD50 - Mallard duck (*Anas platyrhynchos*) or Bobwhite quail (*Colinus virginianus*).

- 2 & 3) Two Avian 8-day dietary LC<sub>50</sub> - Mallard duck and Bobwhite quail.
- 4 & 5) Two 96-hour fish LC<sub>50</sub> - Rainbow trout (*Salmo gairdneri*) and bluegill sunfish (*Lepomis macrochirus*).
- 6) Aquatic invertebrate 48-hour LC<sub>50</sub> - *Daphnia magna* preferred.

A rat LD<sub>50</sub> should be submitted to the Toxicology Branch of the Health Effects Division so that EEB can assess the hazard to mammals. EEB has a list of LD<sub>50</sub>s for CPT-HCl that were submitted by the registrant in a request for and Experimental Use Permit for CPT. Although these studies were ruled "Invalid", they may form the basis for requesting additional studies on other species, especially those that might be prone to secondary poisoning.

When these studies have been submitted and approved by EPA, EEB will be able to assess nontarget and endangered species hazards. At that time it may be decided that other laboratory or field studies will be required and if formal consultation with the Fish and Wildlife Service is necessary.

The "General Information" label should be changed to include at least the complete common name of the target species. The "RESTRICTED USE PESTICIDE" label should be modified to read, "For use only by the U. S. Department of Agriculture personnel trained in bird control or persons under their direct supervision *and then only after consultation with the U. S. Fish and Wildlife Service to ensure that there will be no impact on endangered species*". The added portion has been italicized; it need not italicized on the label. The last sentence of the "Environmental Hazards" label should be changed to, "Do not contaminate water when disposing of equipment washwaters".

EEB concurs with the portion of the "Efficacy Review" of the use labeling that would increase nontarget hazards.

DRC 1339 has a long history of development by the Denver Wildlife Research Center. They have applied this material for years, both as an experimental toxicant and as a control chemical under the §3c2 registrations. The administration of DWRC, both as USDA and USDI, requires annual progress reports of its ongoing projects. FIFRA states that the registrant must provide EPA with any reports that they have concerning the environmental safety of the chemical that they are trying to register. EEB needs all internal and published reports on this toxicant to complete its hazard assessment.

The § 24C registrations that have been referenced by the APHIS were granted years ago apparently without EEB's review. EEB recommends that these §24c registrations be examined as a Registration Standard since the branch has concerns over potential problems to nontarget species in the use of CPT-HCl in bird control.

#### 104. REVIEWED BY:

James J. Goodyear  
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Ecological Effects Branch  
Environmental Fate and Effects Division (H7507C)

Signature: James Goodyear  
Date: Feb 22, 1989

105. APPROVED BY:

Raymond W. Matheny  
Head, Section 1  
Ecological Effects Branch  
Environmental Fate and Effects Division (H7507C)

Signature: Raymond W. Matheny  
Date: 2/23/89

For James W. Akerman  
Branch Chief  
Ecological Effects Branch  
Environmental Fate and Effects Division (H7507C)

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Date: 2/23/89