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Jan Riffe
United States Department of
the Interior
Fish and Wildlife Service
Washington, DC 20240

Dear Dr. Riffe:

Subject: Amendment - Label Update
1339 Gull Toxicant 98% Concentrate
EPA Registration No. 6704-77
Application Dated March 22, 1985

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted.

1. Statement of Practical Treatment, "If swallowed . . ." should be revised to include some instructions about how to induce vomiting.
2. It is not clear which of the three acute toxicities (oral, dermal, or inhalation) caused the signal word to be DANGER with skull and crossbones motif. Precautionary statements of that exposure route should be revised to say "Fatal if . . ." and any other appropriate warnings should be added.
3. Respirator statement should be revised to say "Wear mask or respirator jointly approved by Mining Enforcement and Safety Administration and the National Institute for Occupational Safety and Health."
4. Revise "Wash hands with . . ." to read "Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse."
5. Please submit a Note to Physician or antidote statement for our review. These statements can be added at the time of next label printing.

RD/IRB:JOB:87181;Miller/Palmateer:CBI-F:Kandrick&Co:898-1270:9/9/85:Del:9/19/85:DKD

CONCURRENCES							
SYMBOL ▶							
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1 of 3

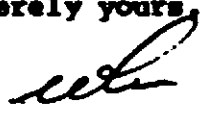
6. In first sentence under "POST-TREATMENT" section of use directions, change "retrived" to "retrieved."

Submit five (5) copies of your final printed labeling before you release the product for shipment. Refer to the A-79 Enclosure for a further description of final printed labeling.

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

A stamped copy of the label is enclosed for your records.

Sincerely yours,



William H. Miller
Product Manager (16)
Insecticide-Rodenticide Branch
Registration Division (TS-767)

Enclosure

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS
(& 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 pesticide is toxic to birds. Do not expose in areas accessible to waterfowl, poultry, and other non-target 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.

**ENDANGERED SPECIES
CONSIDERATIONS**

Before undertaking any control operations with the product, consult with local, State, and Federal wildlife authorities to ensure the use of this product presents no hazard to any endangered species.

DIRECTIONS FOR USE

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

GENERAL: Use 1339 Gull Toxicant 98% Concentrate for preparing bread baits to control herring gulls (*Larus argentatus*) and great black-headed gulls (*Larus marinus*) only. Apply only within the coastal area of Northeastern United States (Delaware, New York, New Jersey, Connecticut, Rhode Island, Massachusetts, New Hampshire, and Maine) in breeding areas or colonies within protection radius of important nesting colonies of terns, puffins, laughing gulls, and other colonial nesting seabirds from March 1 to June 30 each year.

**SEE RIGHT PANEL FOR ADDITIONAL
GENERAL PREPARATION
AND APPLICATION**

RESTRICTED USE PESTICIDE

For retail sale to and use only by certified applicators or persons under their direct supervision and only for those uses covered by the certified applicator's certification.

For use only by U. S. Fish and Wildlife Personnel trained in Bird Control or persons under their Direct Supervision.

**1339 GULL TOXICANT 98%
CONCENTRATE**

Active Ingredient: 3-Chloro-4-Methyl

Benzonitrile Hydrochloride..... 98%

Other Ingredients..... 2%

Also Sold TYPE TOTAL 100%

KEEP OUT OF REACH OF CHILDREN

DANGER—POISON



STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Induce vomiting and immediately call a physician.

IF INHALED: Move patient from contaminated area and immediately call a physician.

IF ON SKIN OR IN EYES: Immediately flush eyes or skin with large quantities of water. Call a physician immediately.

**SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY
STATEMENTS**

ACCEPTED
with COMMENTS
in EPA Letter Dated

SEP 19 1985

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

6704-77

MANUFACTURED FOR:
U. S. DEPARTMENT OF THE INTERIOR
FISH & WILDLIFE SERVICE
Washington, D. C. 20260
EPA EST. NO. 6704-ED-1
EPA REG. NO. 6704-77
Net Weight 16 oz. (1 lb.)

BAIT FOR
1200 gals per
sprinkler tank
or blended in
2-4 gallons
immediately
before use. Prep
for transport
within 12 hrs

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS (& DOMESTIC ANIMALS)

DANGER

Harmful if swallowed, inhaled, or absorbed through the skin. Contact with eyes may cause a severe reaction. Handle only with protective gloves and clothing. Use a face mask or respirator which are approved by the Mining Enforcement and Safety Administration and the National Institute for Occupational Safety and Health. Wash hands thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to birds. Do not expose in areas accessible to waterfowl, poultry, and other non-target 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.

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For use only by U.S. Fish and Wildlife Personnel trained in Bird Control or persons under their Direct Supervision.

1339 GULL TOXICANT 98% CONCENTRATE

Active Ingredient: 3-Chloro-4-Methyl	
Benzenamine Hydrochloride.....	98%
Inert Ingredients.....	2%
	TOTAL 100%

KEEP OUT OF REACH OF CHILDREN

DANGER-POISON



STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Induce vomiting by touching the back of the throat with finger. Call a physician immediately.

IF INHALED: Move patient from contaminated area and immediately call a physician.

IF ON SKIN OR IN EYES: Immediately flush eyes or skin with large quantities of water. Call a physician immediately.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

BAIT PREPARATION: Blend 0.2 oz. (5 gm.) 1339 Gull Toxicant 98% Concentrate into 1 lb. (454 gm.) moist, soft dough. Spread 1/2 oz. (15 gm.) of blend mixture (1 tablespoon) on a slice of standard sandwich bread and cover with another slice. Immediately cut each sandwich into 9 equally-sized cubes. Prepared baits must be placed in a plastic bag for transportation or distribution, and must be used within 12 hours.

BAIT APPLICATION

PRE-TREATMENT: Each site destined to be treated will be prebaited with untreated bread cubes to insure rapid bait acceptance.

TREATMENT: Treatments will be made by hand only in or near nesting colonies of the target species. Treated bread cubes will be broadcast or placed only in the same areas where bread cubes were accepted during prebaiting. Initial applications will be broadcast; however, no broadcast application will be made after April 20. Application after April 20 will be made at or in gull nests. The number of bait applications will be determined by the degree of control provided by previous applications; however, no more than 10 bait applications should be made in or near individual colonies. The number of baits exposed at an individual site must not exceed 5 times the total number of gulls to be controlled at that location.

POST-TREATMENT: Baits regurgitated or not accepted must be retrieved within 12 hours after each application and disposed of by burial or other adequate means. A search must be conducted within 48-72 hours after application to remove and dispose of bird carcasses, except for those areas where disturbances of birds may adversely affect their breeding efforts.

STORAGE AND DISPOSAL

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

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

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spilled bait, 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 by shaking and tapping sides and bottom to loosen clinging particles. Empty container is to application equipment. Then dispose of bags in a sanitary landfill by incineration if allowed by State and local authorities. If burned, stay out of smoke.

DO NOT USE TREATED BREAD AS FOOD OR FEED

SEE RIGHT PANEL FOR ADDITIONAL
GENERAL PREPARATION
AND APPLICATION

ACCEPTED

FEB 13 1986

Under
Funds
as authorized by
10 Feb-77

MANUFACTURED FOR:
DEPARTMENT OF THE INTERIOR
FISH & WILDLIFE SERVICE
Washington, D. C. 20240
EPA EST. NO. 6704-ID-1
EPA REG. NO. 6704-77
Net Weight 16 oz. (1 lb.)