



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

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OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

U.S. Department of Agriculture  
Animal and Plant Health Inspection Service  
6505 Belcrest Road, Room 533  
Hyattsville, Maryland 20782

Attention: Peter L. Joseph

Subject: Compound DRC-1339 98% Concentrate - Pigeons  
EPA Reg. Number 56228-28  
Your letter and label amendments dated August 11, 1994;  
your letter and efficacy data dated August 29, 1994

Dear Mr. Joseph,

We have reviewed the efficacy study referred to above; it has the following identifying data:

- MRID No. 433427-01 - Laboratory Studies with Compound DRC-1339 in Feral Pigeons.

This study was submitted as part of the fulfillment of a condition of the registration of this product by the Agency on 16 July 1992. Our comments on this study are as follow.

1. The report by Cummings, et als. (1994) concerning results of laboratory efficacy and pigeon residues associated with whole-corn baits containing DRC-1339 at nominal concentrations of 0.25% and 0.37% is consistent with other recent results and conclusions regarding these formulations. None of the baits was particularly effective under test conditions. If nontoxic corn also was available to the birds, they favored it and were far less likely to die than were the birds exposed under no-choice conditions. Residues tended to be lower in birds that were offered bait than in birds that were gavaged with the toxicant or force-fed toxic bait.

We note again that there seems to be no reason for scheduling additional field trials comparing the 0.25% and 0.37% concentrations for effectiveness. Summarize any trials that have been completed and not yet fully reported to us and submit a report of such trials to us so that we may "close the loop" on this issue completely.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you:

1. Make the changes listed below to the "DIRECTIONS FOR USE" on the proposed revised label submitted on August 11, 1994.

a. Insert "in" between "Columbia livia" and "roosting" in the first sentence of the "USE RESTRICTION" portion of the label.

b. Restore to the end of the "PREBAITING:" subsection the sentence

"Do not apply toxic bait at sites where prebait has not been accepted well or where nontarget species have been eating prebait."

c. End the second sentence of the first paragraph of "BAIT PREPARATION" after the word "toxicant", deleting "unless good . . . prebaiting". The material which must be deleted suggests use of bait materials that are prohibited elsewhere on the label, for which no mixing directions appear, and for which no sufficient basis for establishing the appropriate active ingredient level has been provided. We do not intend to preclude future discussions of the use of materials other than whole corn for controlling pigeons with baits made with this product but, as noted in an attachment to our letter of June 13, 1994, we need some basic information about the character and performance of baits made from such other materials before we can make headway on risk assessment. The same information would be needed to determine what adjustments to the "DIRECTIONS FOR USE" would be most appropriate.

d. In the first sentence of the second paragraph of "BAIT PREPARATION:", make sure that the temperatures specified for Fahrenheit and Centigrade are equivalent and appropriate. Note that 110°F is approximately 43°C, not 143°C.

2. Alter the "ENVIRONMENTAL HAZARDS" section so that it exactly conforms with the following wording:

"This pesticide is toxic to birds and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment wastewaters or rinsate."

3. Submit one copy of your final printed labeling before you release the product for shipment.

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The proposed changes to the "BAIT APPLICATION" subsection of the "DIRECTIONS FOR USE" are acceptable. The new materials include a proposed new first sentence to the first paragraph--a sentence which seems to have been inspired by regulatory policies that exist only in the state of California. We have accepted this sentence because it appears to us to be appropriate for the bait and application methods that this product's label directs and because, on balance, it appears to improve the quality of the label. You should note, however, that §24(c) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) effectively prohibits States from requiring changes to labels of products registered under §3 of FIFRA.

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

) A stamped copy of the labeling is enclosed for your records.

If you have any questions about this letter, please contact John Bazuin at (703)305-6784 or (703)305-6600.

Sincerely yours,



Robert A. Forrest  
Product Manager (14)  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

) Attachment: Label, Accepted with Comments

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND  
DOMESTIC ANIMALS  
DANGER**

May be fatal if swallowed, harmful if inhaled or absorbed through the skin. Do not breathe vapors or dust. Corrosive, causes eye and skin damage. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. 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 non-target birds. 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 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.

**READ THE ENTIRE LABEL USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.**

**USE RESTRICTIONS**

For the control of feral pigeons (*Columba livia*) roosting or roosting areas on flat rooftops or within fenced areas from which the public, pets, domestic animals, and most nonavian wildlife can be excluded during the time that toxic bait is used.

Bait may only be applied in areas where nontarget species are seldom encountered and have not been detected to have fed upon prebait. Exclude unauthorized personnel from application sites during prebaiting and baiting. Do not place treated baits in locations accessible to children, pets, or domestic animals.

To avoid potential for poisoning the Endangered Species listed below, use of this product is prohibited in the following areas:

**SEE RIGHT PANEL FOR ADDITIONAL DIRECTIONS FOR USE**

**RESTRICTED USE PESTICIDE  
DUE TO HIGH ACUTE TOXICITY TO BIRDS**

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 Applicators certification.

For use exclusively by U.S. Department of Agriculture personnel trained in bird control or persons under their supervision.

**COMPOUND DRC-1339**

**98% CONCENTRATE - Pigeons**

*For control of pigeons causing health, nuisance or economic problems in and around structures or in non-crop areas*

**ACTIVE INGREDIENT:**

3-Chloro-4-methylbenzenamine hydrochloride . . . 98.0%

**INERT INGREDIENTS:** . . . . . 2.0%

**TOTAL** . . . . . 100.0%

**KEEP OUT OF REACH OF CHILDREN  
DANGER - POISON**



**STATEMENT OF PRACTICAL TREATMENT**

**IF SWALLOWED: CALL A PHYSICIAN OR POISON CONTROL CENTER IMMEDIATELY!**

**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.

UNITED STATES DEPARTMENT OF AGRICULTURE  
ANIMAL AND PLANT HEALTH INSPECTION SERVICE

Hyattsville, MD 20782  
Est. No. 56228-ID-1  
Reg. No. 56228-28

**FEB 22 1995**

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 56228-28

RESTRICTED COMMENTS  
EPA Letter Board

**STO**  
Do not conta disposal  
**STORAGE:** inaccessible to  
**PESTICIDE-** hazardous. Im bait, or rinsate cannot be disp contact your Agency, or the nearest EPA R  
**CONTAINER** and tapping s Empty residue bags in a san State and local

**DIREC**  
**Spec**  
Yellow-shoulder  
Puerto Rican p  
Peregrine falco  
**PREBAITING**  
bait acceptance for exposing carriers for toxic  
Before exposi thoroughly to their feeding h preferred "stag the relative al locations routi birds through desirable sites where the targ where nontarg activity patter appropriate ba prebait on roof (within fenced (0.28 kg/100 m generally well necessary to ac  
**SEE REVE DIRECTIONS**

**BEST AVAILABLE CO**

**BAIT PREPARATION:****WHOLE-KERNEL CORN**

Mix toxic bait on site (if possible) just prior to application. Use whole-kernel corn as the carrier for the toxicant unless good acceptance was not achieved during prebaiting, otherwise use cracked corn or chicken scratch as accepted during prebaiting. Screen corn to remove small particles. Prepare bait as follows:

Dissolve 0.6 oz. (17g.) of DRC-1339 98% Concentrate-Pigeons in 0.9 pints (400 ml) of warm potable water or edible oil at 110 °F (43 °C). Pour the liquid mixture over 10 lbs (4.5 kg) of screened whole corn. Allow to dry. Keep bait out of direct sunlight to inhibit discoloration. Treated corn may be diluted with untreated whole corn at rates of one part treated corn to one-to-five parts untreated corn. Apply bait within seven days of the date of its preparation.

**BAIT APPLICATION:** Wear rubber gloves while handling baits and dispense or broadcast the baits using a scoop or other appropriate device. Collect uneaten prebait and substitute the treated bait/untreated corn mixture at locations where prebait was accepted well by pigeons and where nontarget species have not been observed eating prebait. Apply bait at rate at which prebait was accepted, but do not exceed a rate of 25 lbs/acre. Expose bait in the same manner and at the same times of day as were used for prebaiting. Bait acceptance may be greatly enhanced in winter applications if bait is applied when pigeons' natural feeding areas are covered by snow. Continue bait exposure until control is attained or nontarget species begin to feed upon the bait. Retrieve uneaten bait from bait containers and as much as possible of uneaten broadcast bait and dispose of properly.

As DRC-1339 is a relatively slow-acting poison, most birds will die away from the baited area. Many will die at their roosts. Pick up and properly dispose of all dead birds found.

**BEST AVAILABLE COPY**