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USDA
Animal Plant & Health Inspection Service
Animal Damage Control
Federal Bldg. Room 533
6505 Belcrest Road
Hyattsville, MD 20782

Attention: Mr. Steven Palmateer

Subject: Compound DRC-1339 98% Concentrate - Livestock,
Nest & Fodder Depredations
EPA Reg. No. 56228-29
Your submissions of March 6 and April 24, 1995

The Agency has determined that the Confidential Statement of Formula (CSF) dated April 24, 1995, which was submitted with the above amendment in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. A copy of this CSF has been placed in our file for this product. All previous versions are obsolete.

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 make the following labeling changes before you ship product:

1. In the "RESTRICTED USE PESTICIDE" box, change "Due to hazard to nontarget species" to

"DUE TO ACUTE HAZARDS TO EYES, NONTARGET BIRDS AND
AQUATIC INVERTEBRATES, AND TO THE NEED FOR
HIGHLY SPECIALIZED APPLICATOR TRAINING".

2. The proposed new name for this product is acceptable. However, the comma after "Nest" is not needed in the product's name. In narrative portions of the label (e.g., "DIRECTIONS FOR USE"), use either the entire product name or "Compound DRC-1339 98% Concentrate" when referring to this product by name.

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- 3. The claim statement which appears on the center label panel immediately below the name of the product should be edited to read

"For control of crows, ravens, and magpies that prey upon newborn livestock, that prey upon the eggs or young of Federally-designated Threatened or Endangered Species or of other species designated to be in need of special protection, or that damage and feed on the contents of silage/fodder bags."

- 4. Change text in the "ENVIRONMENTAL HAZARDS" section to read

"This pesticide is toxic to birds and aquatic invertebrates. Collect all spilled baits. Do not apply 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 washwaters or rinsate."

- 5. As the uses to which baits made from this product may be put are indicated on the center panel and in the "USE RESTRICTIONS" portion of the "DIRECTIONS FOR USE", there is no need to delineate these uses in the "GENERAL INFORMATION" paragraph which also appears in the "DIRECTIONS FOR USE". Therefore, the "GENERAL INFORMATION" paragraph should be shortened to read

"GENERAL INFORMATION: Compound DRC-1339 98% Concentrate is a slow-acting avicide. Birds ingesting treated baits will die within one to three days."

- 6. Despite its length, the first paragraph of the "USE RESTRICTIONS" does not contain a single complete sentence and mentions meat baits before egg baits even though the "APPLICATION:" directions for meat baits state that they are only to be used "when use of egg baits is impractical or has proven to be ineffective." Revise the first paragraph of the "USE RESTRICTIONS" to read as indicated below.

"This product may be used only to prepare egg or meat-cube baits used to control common ravens (Corvus corax), white-necked ravens (C. cryptoleucus), common crows (C. brachyrhynchos), and black-billed magpies (Pica pica):

- (1) in rangeland and pastureland areas where these species prey upon newborn livestock;
- (2) in refuges or other areas under direct control of Federal or State agencies where ravens or crows prey upon the eggs and/or young of Federally-designated Threatened or Endangered Species, or upon the eggs and young of other species which Federal or State wildlife agencies have determined to be in need of protection from nest predators due to documented declines in numbers and/or in nesting success; or

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silage/folder bags that have been damaged
are likely to be damaged by crows, ravens, or black-
billed magpies.

As this revised paragraph lists all target species, it is not necessarily (although permitted) to include a second listing of them (i.e., under the subheading "TARGET SPECIES:").

7. Change the first two sentences of the "APPLICATION:" portion of the use directions for "EGG BAITS:" to read

"Control of crows, magpies and ravens with egg baits prepared from this product is limited to the sites indicated above under USE RESTRICTIONS. Place all egg baits used at one baited site within 25 ft (7.6 m) of the center of the site, or within 25 ft of any silage/folder bags that are to be protected."

As these changes would make the last sentence in this paragraph ("When baiting to protect silage/folder bags . . . bag") redundant, that sentence should be deleted.

8. Change the first sentence of the "APPLICATION:" portion of the use directions for "MEAT-BAITS:" to read

"Use meat baits prepared from this product only at the sites indicated above under USE RESTRICTIONS and only when use of egg baits is impractical or has proven to be ineffective."

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.

Sincerely yours,

Robert A. Forrest
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (H75040)

Enclosures: 1. Stamped label
2. A-79 Enclosure

Peacock WP#6:A:56228-29:305-5407,-6600:8/30/79.

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**PRECAUTIONARY STATEMENTS
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 non-target birds. For terrestrial uses, 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.

GENERAL INFORMATION: Compound DRC-1339 98% Concentrate is a slow acting avicide for the control of crows and ravens preying on newborn livestock or on the eggs/young of Federally designated Threatened or Endangered Species or other species requiring special protection. Birds ingesting treated bait(s) die within one to three days.

USE RESTRICTIONS

For the preparation of meat-cube or egg baits to control common ravens (*Corvus corax*), white-necked ravens (*Corvus cryptoleucas*), common crows (*C. brachyrhynchos*) and black-billed magpies (*Pica pica*) in rangeland and pastureland areas where these species prey upon newborn livestock, and in refuges or other areas under direct control of Federal or State agencies where ravens and/or crows prey upon eggs/young of Federally-designated Threatened or Endangered Species, or upon eggs/young of other species which Federal or State wildlife agencies have determined to be in need of protection from nest predators due to documented sharp declines in numbers and/or in nesting success. Also for control of corvids that depredate fodder/silage bags.

SEE RIGHT AND BACK PANELS FOR ADDITIONAL DIRECTIONS FOR USE.

RESTRICTED USE PESTICIDE

Due to hazard to nontarget species

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 - Livestock,
Nest, & Fodder Depredations**

For control of crows, ravens, and magpies preying on newborn livestock, or on the eggs/young of Federally-designated Threatened or Endangered Species or on the eggs/young of other species designated to be in need of special protection, or depredating stored fodder.

ACTIVE INGREDIENT:

3-Chloro-p-toluidine hydrochloride 98.0%

INERT INGREDIENTS: 2.0%

TOTAL 100.0%

ACCEPTED with COMMENTS OUT OF REACH OF CHILDREN
by EPA Letter Dated

AUG 31 1995 **DANGER - POISON**



Under the Federal Insecticide, Fungicide, and Rodenticide Act registered for the pesticide 56228-29

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
EPA Est. No. 56228-ID-1
EPA Reg. No. 56228-29

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NOTE: W RAVENS, I KILL-FER SERVICE WILDLIFE /

SEE BAC DIRECTION

DIRECTIONS FOR USE (Cont.)

EGG BAITS:

FORMULATION DIRECTIONS:

Dissolve 2 grams (0.035 oz.) of Compound DRC-1339 98% Concentrate - Livestock & Fodder Depredations in 100 ml (0.2 pt) of warm potable water at 43.3 °C (110 °F) to make a "2%" solution; or dissolve 4 grams (0.07 oz) of Compound DRC-1339 98% Concentrate - Livestock Depredations in 100 ml (0.2 pt) of warm potable water to make a "4%" solution; or in other proportions appropriate to produce a "2%" or "4%" solution.

Using an 18-ga hypodermic needle or similar-sized implement, make an entry hole in the end of each hard-boiled chicken, turkey, or duck egg to be used. Using a syringe and a 20-ga. hypodermic needle, slowly inject 1 ml. of the "2%" solution (or 0.5 ml of the "4%" solution) into the yolk of each egg.

MAKE ONLY ENOUGH SOLUTION TO TREAT THE DESIRED NUMBER OF EGGS. MARK TREATED EGGS WITH SMALL SKULL AND CROSSBONES OR THE WORD "POISON."

DIRECTIONS FOR USE (Cont.)

EGG BAITS:

APPLICATION:

Control of crows, magpies and ravens is limited to the following sites: areas where they are suspected of being involved in livestock or nest depredation; areas where they are suspected of piercing the protective cover of silage/fodder bags. Place all egg baits used at one baited site within 7.6 m (25 ft) of the center of the bait site. Place 1-4 eggs in each bait set, and do not use more than a total of 18 eggs per baited site. If a draw station (fresh, unpoisoned animal carcass) is used, all bait sets must be located at least 3 m (10 ft) from the carcass. Any silage that is spilled from the silage bag is not to be used for livestock feed. When baiting to protect silage/fodder bags do not place the baits more than 25 feet from the bag.

Whenever practicable, bait sets should be made in "dummy" nests created by making small depressions in the ground. "Dummy" nests may be partially hidden by vegetation or other debris.

In other situations, eggs may be placed on 1-ft² to 2-ft² elevated wooden platforms and restrained by wire to prevent eggs from falling off platforms or being removed by birds. Use 2-3 eggs per platform.

DO NOT USE MORE EGGS THAN ARE NEEDED TO EFFECT CONTROL as ravens and crows tend to cache surplus food.

Observe baited areas (from blinds) early in baiting (or prebaiting, if done) to determine whether nontarget species are approaching egg baits. Haze away Threatened or Endangered Species that might be at risk from baits. Remove baits if such Threatened or Endangered Species continue to approach them.

Egg sets should be checked at 48-hour intervals. Rebait with additional treated eggs when more than 50% of the treated eggs offered have been removed by ravens, magpies or crows. When replacing baits, take care not to frighten target birds actively removing or feeding upon eggs. Retrieve unconsumed treated eggs within seven days of exposure. Old treated eggs and treated eggs not eaten by the time control operations cease must be disposed of in accordance with applicable State and Federal laws.

DIRECTIONS FOR USE (Cont.)

MEAT BAITS:

FORMULATION DIRECTIONS:

Mix 0.75 grams (0.027 oz) of Compound DRC-1339 98% Concentrate - Livestock & Fodder Depredations with 5.0 grams (0.18 oz) of powdered sugar. Pour and sprinkle concentrate-sugar mixture over 200 mm³ cubes that measure about 1.3 cm (1/2 in.) on each side. Mix or tumble bait slowly until all meat cubes appear to be evenly covered.

APPLICATION:

Only use meat baits when use of egg baits is impractical or has proven to be ineffective. Limit use of meat baits to areas where ravens, magpies and crows are known or suspected to be involved in depredation problems.

Place no more than 75 baits at each baited site. Place 5 to 10 baits in clusters over an area not to exceed 93 m² (1000 ft²) where control of ravens, magpies and/or crows is desired. Draw stations (fresh, unpoisoned animal carcasses) may be needed to attract ravens, magpies and/or crows to desired bait exposure locations. When draw stations are used, place meat baits on or near the animal carcasses.

WHILE MEAT BAITS ARE EXPOSED, BAITED AREAS MUST BE OBSERVED CONTINUOUSLY FROM A DISTANCE OF NO MORE THAN 914 m (1000 yd) TO DETECT APPROACHES BY THREATENED OR ENDANGERED SPECIES AND OTHER DESIRED OR PROTECTED ANIMALS LIKELY TO EAT BAITS. Flush such nontarget animals away from treated baits by use of non-injurious methods. Because of wariness of target bird species, it may be necessary to observe baits from behind natural or specially constructed blinds.

Unconsumed bait cubes must be retrieved at the conclusion of each observation period and no later than one hour after sunset daily. Dispose of retrieved baits in accordance with applicable State and Federal laws.

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