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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

56228-29

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 ACUIE 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 imagpies 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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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 "ATPLICATION:" portion of the use directions for "ESG BALTS:" 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 silade/folder bags that are to be protected."

As these changes would make the last contained in this paramaph ("Wen builting to protect cillage/folder bags . . . bay") redundant, that contents head he deleted.

b. Charge the first sentence of the "APPLICATION:" perticute the use directions for "MEAT-BAINS:" to real

"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 ineifective."

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 (H7504c)

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

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Peacock WP#6:A:56228-29:305-5407,~6600:8/30/99

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PRECAUTIONARY STATEMEN"S 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 eggs/young of Federally designated Threatened orfunctioned, and Instanticide Act. Endangered Species of other another and threatened orfunctioned and the positicide Endangered Species or other species requiring special protection. Birds ingesting treated balt(s) die within one to three days.

USE RESTRICTIONS

For the preparation of meat-cube or edg balts to control common rayens (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 prev 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.

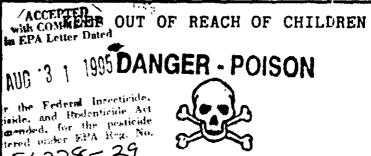
COMPOUND DRC-1339 98% CONCENTRATE - Livestock, Nest, & Fodder Depredations

For control of crows, ravens, and mapples preving on newborn livestock, or on the eggs/young of Federallydesignated 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:

TOTAL 100.0%

2.0%



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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ST(Do not cont disposal.

STORAGE: place inact animals.

PESTICIDE hazardous. I bait. or rins wastes cann instruction Environment representativ guidance.

CONTAINE shaking and particles. Er incineration burned, stay

DIRE TARGET SI

Common ray White-necke Common cro Black-billed

USE

Before apph habits of ra times of day likely to find nontarget an treated baits materials m target speci nontarget sp

DO NOT a danger that consume ba limit such e constant ob tactics to f Species that

Discose of u or dying bir authorized b

NOTE: V **RAVENS, I** KILL-PERM SERVICE WILDLIFE /

SEE BAG 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 hardboiled chicken, turkey, or duck egg to be used. Using a syringe and a 20-ga, hypodermic needle, slowly inject 1 mil. 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, magples and ravens is limited to the following sites; areas where they are suspected of being involved in livestock or nest depravation; areas where they are suspected of piercing the protective cover of silage/todder 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 aliage/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. Femove baits if such Threatened or Endangered Species continue to approach them.

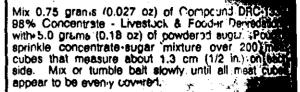
Egg sets should be checked at 48-hour intervals. Rebait with additional treated eggs when more than 50% of the treated eggs offered have been removed by ravens, magpies or crows. When replacing beits, take care not to frighten target birds actively removing or feeding upon eggs. Retrieve unconsumed treated 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.

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DIRECTIONS FOR USE COM

MEAT BAITS:

FORMULATION DIRECTIONS:



APPLICATION:

Only use meat baits when use of egg baits in impractical or has proven to be ineffective. Limit used meat baits to areas where ravens, magples and crow are known or suspected to be involved in depredator problems.

Place no more than 75 baits at each baited site. Place 5 to 10 baits in clusters over an area not to exceed 95 m² (1000 ft²) where control of ravens, mapples and/or crows is desired. Draw stations (fresh, unpoisoned animat carcasses) may be needed to attract ravels magpies and/or crows to desired ball? exposure tocations. When draw stations are used, place mean 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 \$14 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 balts 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