

56228-29

12/11/2013

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



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

DEC 11 2013

Ms. Stephanie Stephens
USDA APHIS Environmental
Risk and Analysis Services, Unit 149
4700 Riverdale Rd
Riverdale, MD 20737

Dear Ms. Stephens:

Subject: Label revisions to add scooping and other language in response to Agency comments during registration review
Compound DRC-1339 Concentrate – Livestock, Nest & Fodder Depredations
EPA Registration No. 56228-29

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment.

Note: Should you wish to add a reference to the company's website on your label, please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, **regardless of whether a website is referenced on your product's label**, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

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 constitutes acceptance of these conditions. If you have questions about this letter, please contact Jennifer Gaines at (703) 305-5967 or via e-mail at gaines.jennifer@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Reuben Baris".

Reuben Baris
Acting Product Manager (07)
Insecticide-Rodenticide Branch
Registration Division (7505P)

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

Acute Hazards: Fatal if inhaled. Corrosive. Causes irreversible eye damage and skin burns. May be fatal if swallowed. Harmful if absorbed through skin. Prolonged or frequently repeated skin contact may cause allergic reactions in some people.

Hazard Avoidance: Do not get in eyes, on skin, or on clothing. Do not breathe dust. Wear protective clothing, eyewear, and respiratory protection as listed under "Personal Protective Equipment." Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse.

**PERSONAL PROTECTIVE EQUIPMENT:
Handlers who mix packages containing 1 lb or more of this product must wear:**

- Coveralls over long-sleeved shirt and long pants
- Chemical-resistant gloves (such as waterproof or rubber gloves)
- Chemical resistant footwear plus socks
- Protective eyewear (goggles or face shield)
- Respirator with a dust/mist filtering respirator (MSHA NIOSH approval number prefix TC-21C or NIOSH approved respirator with any N, R, P, or HE filter)

Handlers who mix packages containing less than 1 lb of this product must wear:

- Long-sleeved shirt and long pants
- Chemical resistant gloves (such as waterproof or rubber gloves)
- Protective eyewear (goggles or face shield)

Applicators who handle bait must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves (such as waterproof or rubber gloves)

User Safety Requirements:
Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions are provided for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.
Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
Remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.


RESTRICTED USE PESTICIDE
Due to High Acute Inhalation Toxicity and Eye and Skin Corrosiveness to Humans; High Acute Toxicity to Nontarget Birds and Aquatic Invertebrates; and the Need for Highly Specialized Applicator Training.

For retail sale to and use only by USDA APHIS Certified Applicators trained in bird control or by persons under their direct supervision.

**COMPOUND DRC-1339 CONCENTRATES –
Livestock, Nest & Fodder Depredations**
For control of crows, ravens, and magpies that prey on newborn livestock, that prey on eggs or the 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.

Active Ingredient:
Starlicide, 3-chloro-p-toluidine hydrochloride: 97.0%
Inert Ingredients: 3.0%
TOTAL: 100.0%

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



**ACCEPTED
DEC 1 1 2013**

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pest control use Registered under EPA Reg. No. 56228-29

If swallowed	-Call a poison control center or doctor immediately for treatment advice. -Have person sip a glass of water if able to swallow. -Do not induce vomiting unless told to do so by the poison control center or doctor.
If on skin or clothing	-Take off contaminated clothing. -Rinse skin immediately with plenty of water for 15-20 minutes. -Call a poison control center or doctor immediately for advice.
If inhaled	-Move person to fresh air. -If person is not breathing, call an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. -Call a poison control center or doctor immediately for advice
If in eyes	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor immediately for advice
NOTE TO PHYSICIAN AND VETERINARIAN: Probable mucosal damage may contraindicate the use of gastric lavage. See additional PRECAUTIONARY STATEMENTS on Left Panel. If pet eats bait, call a veterinarian at once.	

ENVIRONMENTAL HAZARDS

This product is very highly toxic to birds and aquatic invertebrates. Do not use in any manner that may endanger desirable and protected bird species. Runoff may be hazardous to aquatic organisms in neighboring areas. Do not apply when runoff is likely to occur. 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 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. DO NOT apply in areas where the product may be consumed by Endangered Species.

DIRECTIONS FOR USE

Read the entire label for a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ THIS LABEL:

Read the entire label. This product must be used strictly in accordance with this label's precautionary statements and directions, as well as with all applicable State and Federal laws and regulations.

Before using this product, contact the U.S. Fish and Wildlife Service and the applicable State wildlife agency and obtain all necessary kill or collecting permits. Use only for the sites, pests, and application methods described on this label.

GENERAL INFORMATION:

This product contains a slow-acting avicide which kills target bird species (see list below) in 1 to 3 days. As many types of nontarget birds are potentially vulnerable to DRC-1339, it is necessary to use care and to follow the requirements of this label to minimize impacts to nontarget species.

(See next page for additional DIRECTIONS FOR USE)

**UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION
SERVICE**

4700 River Road, Unit 149
Riverdale, MD 20737

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

Net Contents:
Batch Code No.:

DIRECTIONS FOR USE, continued

USE RESTRICTIONS:

Baits made from Compound DRC-1339-Livestock, Nest & Fodder Depredations may only be used to control the following species: common raven (*Corvus corax*), Chihuahuan raven (*Corvus cryptoleucus*), American crow (*Corvus brachyrhynchos*), Black-billed magpie (*Pica pica*), and Fish Crow (*Corvus ossifragus*). This product may be used to prepare egg or meat-cube baits to control the target species listed above in the following use sites:

- rangeland and pastureland areas where ravens or crows prey upon newborn livestock;
- refuges or other areas 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
- within 25 feet of silage/fodder bags that have been damaged or are likely to be damaged by crows, ravens, or black-billed magpies.

Baits must be prepared and applied as specified on this label. DO NOT apply baits made from this product by air or by use of any mechanical equipment designed to broadcast baits or other pesticides. Users of this product must follow all limitations indicated on this label regarding the placement and monitoring of treated baits.

Before baits made from this product are applied, sites that are to be treated must be observed for evidence of nontarget activity and must be prebaited (see specific instructions for these activities). **DO NOT** apply treated baits where there is a danger that Threatened or Endangered Species will consume baits unless special precautions are taken to limit such exposures. Such precautions shall include constant observation of baited sites and use of hazing tactics to frighten away Threatened & Endangered Species that otherwise might feed upon baits.

DIRECTIONS FOR USE, continued

USE RESTRICTIONS, continued:

DO NOT apply treated baits within 50 feet of permanent manmade or natural bodies of water, unless baited sites are under constant observation while baits are exposed.

DO NOT exceed a maximum application rate of 0.083 lbs of active ingredient per treated acre. That rate is equivalent to 18 treated-egg baits in at least 5 bait sets applied over an area of 400 ft² surrounding an animal carcass draw station.

DO NOT store, apply, or even temporarily place treated bait in locations accessible to children, pets, domestic animals, or non-target wildlife.

DO NOT apply bait in a way that will contact workers or other persons.

DO NOT use treated baits as food or feed.

DO NOT apply baits made from this product in any way that could contaminate human food or animal feed.

ENTRY RESTRICTIONS:

Keep persons other than authorized handlers, as well as pets and livestock, away from the bait at all times. Only protected handlers may be in the area during bait application. Exclude all unauthorized persons from application sites during prebaiting and baiting.

PRETREATMENT OBSERVATIONS:

Before applying treated baits in any problem area, carefully observe target birds' feeding habits to locate their preferred feeding sites, determine the optimum time of application, and evaluate potential hazards of the application to desirable and/or protected animal species. **DO NOT** apply bait(s) in areas where there is danger of consumption by Threatened or Endangered species.

PREBAITING:

Prebaiting with untreated bait materials (or use of a draw station) is necessary to promote feeding by target species and to assess potential for exposure of nontarget species. Apply prebait using the same procedures that are prescribed below for the type of bait (**EGG BAITS** or **MEAT BAITS**) that is to be used for toxic baiting.

DIRECTIONS FOR USE, continued

BAIT PREPARATION:

MEAT BAITS

MEAT BAIT PREPARATION:

1. Mix 0.75 g (0.027 oz) of this product with 5.0 g (0.18 oz) of powdered sugar.
2. Pour or sprinkle concentrate-sugar mixture over 200 meat cubes that measure about 1.3 cm (1/2 in) on each side.
3. Mix or tumble bait slowly until all meat cubes appear to be evenly covered.

MEAT BAIT APPLICATION:

NOTE: During application, wear all PPE as listed in the Precautionary Statements.

Control of crows, magpies, and ravens with meat baits prepared from this product is limited to the sites indicated above under **USE RESTRICTIONS**. Wear rubber gloves while handling baits. Place no more than 75 meat cube baits at each baited site. Place 5 to 10 baits in clusters over an area not to exceed 1000 ft² (93 m²) where control of ravens, magpies, and/or crows is to be affected. **Draw stations** (fresh, unpoisoned animal carcasses) may be needed to attract ravens, magpies, and/or crows to the locations selected for bait exposure. If draw stations are used, place meat baits on or within a few feet of the animal carcasses.

WHILE TREATED MEAT BAITS ARE EXPOSED, BAITED AREAS MUST BE OBSERVED CONTINUOUSLY FROM A DISTANCE OF NO MORE THAN 1000 YARDS (914 m) TO DETECT APPROACHES BY THREATENED OR ENDANGERED SPECIES AND OTHER DESIRED OR PROTECTED ANIMALS LIKELY TO EAT BAITS. Flush 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 daily, at the conclusion of each observation period and no later than one hour after sunset. Dispose of retrieved baits in accordance with applicable State and Federal laws.

DIRECTIONS FOR USE, continued

EGG BAITS

EGG BAIT PREPARATION:

Dissolve 2 g (0.07 oz) of the product in 100 ml (0.2 pt) of warm potable water at 43.3°C (110°F) to make an approximately 2% solution; or dissolve 4 g (0.14 oz) of the product in 100 ml of warm potable water at 43.3°C (110°F) to make an approximately 4% solution; or in other proportions to produce a 2% or 4% solution.

Using an 18-gauge hypodermic needle or similarly-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-gauge 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.

EGG BAIT APPLICATION:

NOTE: During application, wear all PPE as listed in the Precautionary Statements.

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 to be used at one baited site within 25 ft (7.6 m) of the center of the site or within 25 ft of any silage/fodder bags that are to be protected. 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 10 ft (3 m) from the carcass. Wherever practical, 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 elevated wooden platforms 1 ft² to 2 ft² in area. Eggs placed on platforms must be restrained by wire to prevent them from falling off platforms or being removed by birds. Apply 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 prebaiting or baiting period to determine whether nontarget species are approaching egg baits. Haze away Threatened or Endangered and nontarget species that might consume baits. Remove baits if such nontarget species continue to approach them.

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 7 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.

**POST-TREATMENT CLEAN-UP
(Meat and Egg Baits):**

NOTE: During clean-up, wear long-sleeved shirt and long pants and chemical-resistant gloves (such as waterproof or rubber gloves). To further reduce the potential for exposure, use appropriate implements such as scoops or other tools to collect carcasses or uneaten bait.

Collect unconsumed and leftover meat or egg baits and carcasses of dead or dying birds. Dispose of such baits and carcasses by burning or burial, as authorized by applicable laws and ordinances.

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 HANDLING: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Completely empty bags by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. If bags are not to be recycled, dispose of bags in a sanitary landfill or by incineration if allowed by State and local authorities. If burned, stay out of smoke.