

US EPA ARCHIVE DOCUMENT

SHAUGHNESSEY NO.
009901

REVIEW NO.
5

EEB BRANCH REVIEW

DATE: IN 5-30-84 OUT 5-31-84

FILE OR REG. NO. IN-840005

PETITION OR EXP. PERMIT NO. _____

DATE OF SUBMISSION 5-3-84

DATE RECEIVED BY HED 5-25-84

RD REQUESTED COMPLETION DATE 6-25-84

EEB ESTIMATED COMPLETION DATE 6-25-84

RD ACTION CODE/TYPE OF REVIEW 585/Section 24(c)

TYPE PRODUCT(S): I, D, H, F, N, R, S Avicide

DATA ACCESSION NO(S) _____

PRODUCT MANAGER NO. W. Miller (16)

PRODUCT NAME(S) Compound DRC-1339

COMPANY NAME U.S.F.W.S.

SUBMISSION PURPOSE Proposed State of Indiana Registration
of Starlicide

| SHAUGHNESSEY NO. | CHEMICAL, & FORMULATION | % A.I. |
|-------------------|-----------------------------|-------------------|
| <u>009901</u> | <u>3-chloro-p-toluidine</u> | <u> </u> |
| <u> </u> | <u>hydrochloride</u> | <u>98</u> |
| <u> </u> | <u> </u> | <u> </u> |

EE Branch Review

DRC 1339 (24(c) Indiana IN-84 0005)

100 Submission Purpose and Label Information

100.1 Submission Purpose and Pesticide Use

Purpose: The State of Indiana is applying for a 24(c) registration for the use of Compound DRC-1339. No specific sites, other than rooftops for pigeons, are indicated.

Use: The product is used to control bird problems.

100.2 Formulation Information

DRC-1339 has a 98% active ingredient. This concentrate is to be mixed in the field as indicated below:

(From the label)

Feral Pigeons

"Preparation of 0.37% DRC-1339 toxic bait: The toxic bait should be mixed on site just prior to exposing.

Dissolve 1.35 oz. of DRC-1339 and 2 Tbsps of cornstarch in 32 oz. of water or edible oil. If an edible oil is used, the cornstarch may be omitted. The amount of liquid can be adjusted to give uniform coverage.

Pour mixture over 20 pounds of grain — oat groats, cracked corn, whole corn or commercial pigeon mix. Mix or tumble slowly until mixture is evenly distributed over the grain.

Dilute DRC-1339 treated bait at the rate of 2 parts treated bait to 5 parts untreated bait."

Roosting Birds

"Preparation of 1.0% DRC-1339 toxic bait: The toxic bait should be mixed on site just prior to exposing.

Dissolve 1.6 oz. of DRC-1339 and 1 Tbsp cornstarch in 16 oz. water or edible oil. If an edible oil is used, the cornstarch may be omitted. The amount of liquid can be adjusted to give uniform coverage.

Pour mixture over 10 lbs. of bait — pig starter pellets, oat groats, cracked corn or whole corn. Pellets, oat groats or cracked corn is best for starlings and blackbirds; whole corn is best for crows. Mix or tumble slowly until mixture is evenly distributed over the grain.

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Dilute the DRC-1339 treated bait at the rate of 1 part treated bait to no more than 9 parts untreated prebait."

100.3 Application Methods, Directions, Rates

General Baiting Procedures (From label)

"Before exposing treated baits, thorough observations should be made to determine the number of birds present, their feeding habits, their preferred locations, their daily behavior pattern, and the presence of non-target species. Observations should continue throughout the day. During these observations desirable locations for bait exposure should be selected. If adequate precautions are taken in selecting baiting sites no other species should be harmed.

When the daily activity pattern of the birds has been established and baiting locations selected, clean bait should be used to determine the preferred bait. Prebaiting should continue for several days or until there is good bait acceptance. Toxic baits should not be exposed until good acceptance of clean bait occurs.

Treated baits should be placed in locations not accessible to children, pets, non-target wildlife and domestic animals."

Feral Pigeons (From label)

"Prebaiting: Prebaiting with clean, untreated bait is essential for good control. Prebait and treated bait must be of the same grain bait. Prebait and treated bait must be of the same grain bait. Prebaiting sites should be in locations not accessible to unauthorized personnel, children, pets and domestic animals. Rooftops make good baiting sites. Acceptance of prebait should be well established in one to two weeks. If at the end of that time, prebait is not accepted, new sites should be selected."

"Exposing treated bait: When the prebait is accepted freely at all locations, any uneaten prebait should be picked up, and the treated bait substituted. The treated bait should be put out in the same manner and at the same time that the prebait was put out. DRC-1339 treated bait is relatively slow acting. Most birds will die overnight at their roost. Continue bait exposure until feeding stops or desired control is obtained. Pick up and dispose of dead birds."

Roosting birds (From label)

"Prebaiting: Prebaiting with clean, untreated bait is essential to determine preferred bait and baiting locations. Scatter prebait at the rate of about 25 lbs./acre, at staging areas used by birds prior to going to roost."

"Exposing treated bait: Treated bait must be exposed in the same location as was the prebait. Scatter at the same rate as the prebait in the staging area that birds use prior to going to roost.

DRC-1339 treated bait is relatively slow in action and most birds will die overnight at their roost. Continue bait exposure until feeding stops or desired control is obtained. Pick up and dispose of dead birds."

100.4 Target Organisms

For the control of Feral pigeons (Columba livia) and roosting birds such as common crow (Corvus brachyrhynchus), Starlings (Sturnus vulgaris), Red winged blackbirds (Agelaius phoeniceus), Tricolored blackbirds (Agelaius Tricolor), Brewers blackbird (Euphagus cyanocephalus), common grackle (Quiscalus quiscula) and Brown-headed cowbird (Molothrus ater).

100.5 Precautionary Labeling

None on Indiana label.

101 Hazard Assessment

101.1 Discussion

DRC-1339 is a non-selective avicide. The label lacks site specific areas (e.g. feedlots, urban, etc.) therefore EEB is assuming that this product can be used in any area in which a target species occurs. Therefore, non-target avian species could be exposed. The pre-baiting/observation period could mitigate the hazard to non-targets. Conversely, the prebaiting may attract non-target avian species. Additionally, there has been some concerns over potential secondary hazard to scavenging avian species.

Most of the concerns stated above are mitigated by labeling. First, during the prebait/observation period the applicator must determine the presence of non target species. Second, they are required to pick up and dispose of the dead birds.

101.2 Endangered Species

Due to the short turn-around time, a formal consultation on this product cannot be conducted. Therefore, EEB proposes label statements in Section 101.3 below.

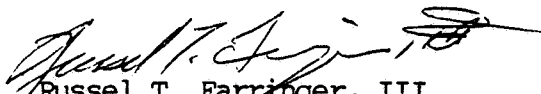
101.3 Adequacy of Labeling

In order to indicate that a severe hazard to non target avian species and potential endangered species, the following label statements are recommended:

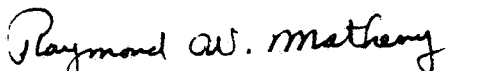
"This product is highly toxic to all avian species. If endangered avian species are in the proximity of a proposed baiting site, that site should be aborted. Compound DRC-1339 must not be used in any manner that will endanger desirable and protected wildlife. If there is a question of any such hazard or legality of bird control with toxic agents, consult local, State and Federal game authorities before undertaking control with this product."

102 Conclusions

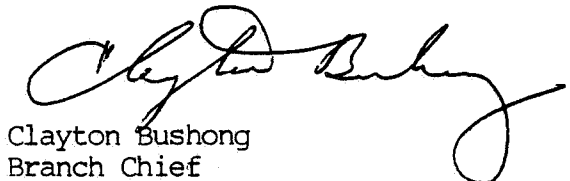
EEB has reviewed the 24(c) from the state of Indiana for use of DRC-1339 to control feral pigeons and roosting birds. EEB has concluded that the present label is deficient in regards to precautionary labeling. EEB has proposed expansion of the precautionary statement in section 101.3 above that would help to mitigate the hazards associated with this proposed use.


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Date: 6/1/84


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