

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

5-4-78
625A

Cancel No.

DATE: May 4, 1978

SUBJECT: Oxamyl, TB comment on Item C in 4/28/78 submission, PP Nos. 6F1695; 6F1696.

FROM: TB/RD

TO: Mr. Frank Sanders, PM

PP No. 6F1695 (ref'd to 6F1696 & 7F1954)

E. I. du Pont de Nemours
Wilmington, Del. 19898

This will respond to Petitioner's reply [of 4/28/78, PP Nos. 6F1695, 6F1696, and 7F1954] to Item C of EPA reject ltr. [of 4/27/78, F. Sanders - J. J. Trexel, du Pont, PP No. 6F1695] which reads: Most of the data on the synthesis of essential amino acids were submitted in terms of combined amino acids (Table IV). Submit skin, hair, and blood data for each individual amino acid.

Petitioner says no such requested data and no additional skin/hair or blood samples are available. Presumed (derivatized) amino acids were not trapped individually (on exit from gas chromatograph at intervals corresponding to their respective retention times) for determination of C14 content, but, rather, as composites of two or more, in order to increase sensitivity of determination of C14 content.

Our Comment:

This appears to leave Petitioner's truly scientifically interesting claim hanging - without any further study, leading either to confirmation or refutation. (The claim (made in J. Harvey, Jr., letter, submitted, 2/8/78, PP No. 1696) is that rats fed C14-labelled oxamyl [(CH3)2NCOCl4(SCH3)=NOCONHCH3] can synthesize C14-labelled essential amino acids, carbon skeletons of which the rat is commonly presumed not to be able to synthesize.)

We find this truly regrettable, for (as we noted in our 3/23/78 memo on this point, PP No. 6F1696) we would be surprised should the claim prove valid. Its confirmation would provide a discovery of basic significance and one worthy of publication. While provision of our requested data could by no means have confirmed the claimed finding, it could have provided some indication of its validity.

We would recommend to Petitioner that, because of the basic significance of his presumed finding, he pursue it by further experimentation.

MLQ 5/5/78
Mary L. Quaife, Ph.D.
TB/RD

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