UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

005623

DEC 11 1986

MEMORANDUM

SUBJECT: Data Call-In for Naptalam resulting from its Registration Standard. Tox. Proj. #1724/1725, CASWELL #592

TO: Robert Taylor (25)
Registration Division (TS-767C)

FROM: Winnie Teeters, Ph.D. Winnie Teeters 12-5-86
Pharmacologist, Section V
Tox. Brn./HED (TS-769C)

THRU: Laurence D. Chitlik, D.A.B.T. 12/8/86
Head, Section V
Tox. Brn./HED (TS-769C)

and

Theodore M. Farber, Ph.D. 12/11/86
Chief, Toxicology Branch
Hazardous Evaluation Division (TS-769C)

CHEMICAL: Naptalam; Alanap

ACTION REQUESTED: Review submitted acute studies for Naptalam.

RECOMMENDATIONS: Toxicology Branch does not find that either the Acute Dermal Toxicity Study or the Acute Inhalation Toxicity Study with Naptalam meets the current toxicological data requirements for these studies. For specific details, please see the enclosed DERs for these studies.

Reviewer Comment: These reports both indicate that Alanap Technical is the test material; yet it is described as a dust in the inhalation study and as a granular material in the dermal study. There is no registration for the technical material from which to obtain a description of its physical state to resolve this apparent discrepancy.

Reviewer Note to PM: On page 2 of this submission there is a statement by the sponsor that the Agency overlooked several chronic studies in both the Data Call-In and the Reregistration Guidance Document, and these have been referenced in this submission. These studies and their status have not been addressed in this action.

Reviewed by: Winnie Teeters, Ph.D.
Section V, Tox. Branch (TS-769C)
Secondary Reviewer: Laurence D. Chitlik, D.A.B.T.
Head, Section V, Tox. Branch (TS-769C)

DATA EVALUATION REPORT

STUDY TYPE: Acute Dermal Toxicity Tox. Chem. No.: 592

Accession No.: 260019 MRID NO.: Tox. Proj. No.: 1724

TEST MATERIAL: Alanap (Technical)

SYNONYM: Naptalam, sodium N-1- naphthylphthalamate

STUDY NO.: Lab. #5294a

SPONSOR: Uniroyal, Inc.

TESTING FACILITY: Food and Drug Research Labs.

TITLE OF REPORT: Acute Dermal Toxicity Study In Rabbits

AUTHOR: J.G. Babish, Ph.D.

REPORT ISSUED: 12-10-76

CONCLUSIONS: Although it is stated that no deaths occurred following a dosage level of 2 gm/kg to 10 rabbits, the study report is inadequate in regard to procedural details and reporting requirements (see "Classification", below).

Classification: Core-Supplementary Data. The sexes of the animals used, their initial and terminal weights, test compound preparation, test site description, test material dosing procedures, clinical signs and autopsy findings were not provided. In fact, the entire report consisted of only one page, which is attached hereto.

A. Materials

1. Test compound: Alanap (Technical)

   Description: granular material

   Batch: Lot No. BL 7960

   Purity: Not stated

2. Test Animals- Species: Rabbits
   Strain: Not stated
   Age: Not stated

Weight: Not stated
Source: Not stated

B. Study Design:

Ten rabbits were each dosed dermally with 2 gm/kg of Alanap and observed for 14 days.

C. Results:

No deaths occurred and it was stated that no noteworthy findings were seen during the observation period.

Furthermore, the report stated that it was concluded that "the approximate acute dermal toxicity (LD_{50}) of the test material identified above is greater than 2.0 gm per kg of body weight when applied to the intact or abraded skin".

ALA 00018

005623

FDRL

FOOD AND DRUG Research LABORATORIES, INC.

WAVERLY RESEARCH CENTER
Route 17C
P. O. Box 107
Waverly, New York 14892
(607) 565-2931

REPORT

Submitted to: Uniroyal, Incorporated
74 Amity Road
Bethany, Conn. 06525

Data: December 10, 19

Laboratory No. 5294a

Sample: Granular material

Marking: ALANAP (TECH) C'3199300; Lot No. BL7960; 4 oz.

Examination Requested: Acute Dermal Toxicity Study in Rabbits

Procedure: The acute dermal toxicity study (single exposure) was conducted on adult albino rabbits selected from healthy, acclimated animals, as described in 16 CFR 1500, 40

Results: See table below. No noteworthy findings were seen during the observation period

Dosage* Level gm/kg	No. Rabbits Dosed	Deaths Day 1	2	3	4	5	6	7	8	9	10	11	12	13	14	Mortal afte 14 day
2.0	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0/10

Conclusion: The approximate acute dermal toxicity (LD_{50}) of the the test material identified above is greater than 2.0 gm per kg of body weight when applied to the intact or abraded skin.

John G. Babish, Ph.D.
Assistant Director,
Waverly Research Center

4

005623

Reviewed by: Winnie Teeters, Ph.D.
Section V, Tox. Branch (TS-769C)
Secondary reviewer: Laurence D. Chitlik, D.A.B.T.
Section V, Tox. Branch (TS-769C)

DATA EVALUATION REPORT

STUDY TYPE: Acute Inhalation Toxicity TOX. CHEM. NO.: 592

ACCESSION NO.: 260019 MRID NO.: - TOX. PROJ. NO. 1725

TEST MATERIAL: Alanap Technical Grade

SYNONYM: Naptalam, sodium N-1-napthylphthalamate

STUDY NO.: IBT #8562-09884, P.O. NO.: 3350-P6-07261

SPONSOR: Uniroyal Chemical

TESTING FACILITY: Industrial Bio-Test Labs., Inc.

TITLE OF REPORT: Acute Dust Inhalation Toxicity Study In Rats

AUTHORS: C. Peters, B.A. and J.W. Goode, Ph.D.

REPORT ISSUED: 1-26-77

CONCLUSIONS: It was stated that the acute LC_{50} was greater than 2.07 mg/l air, yet the particle size determination indicated that all particles were greater than 25 microns. Consequently, none of the particles is considered of respirable size, and inhalation toxicity cannot be determined under such circumstances; the animals must be exposed to a respirable form of the test material for its inhalation toxicity to be evaluated.

Classification: Supplementary Data. This study has this classification for several reasons. Foremost is that the inhalation toxicity of a dust cannot be determined by exposure in an environment which does not contain respirable particles of the test material. Furthermore, the study does not meet current requirements for this type of study. No individual animal data are provided; there are only summary statements regarding clinical signs, weight changes, mortality and necropsy findings. Particle size distribution was determined by microscopic observation of a sample of the test atmosphere and counting the particles with respect to four size ranges. The only distribution results provided was a statement that all particles exceeded 25 microns in size.

A. MATERIALS:

1. Test compound: Alanap Technical Grade #3199300
   Description: dust
   Batch: Lot # BL 7959
   Purity: not stated

2. Test animals: Species: rat

005623

Strain: Charles River
Age: not stated
Weight: not stated
Source: not stated

B. STUDY DESIGN: Five male and five female rats were given whole body exposure for 4 hours to an air/dust mixture containing an analytical concentration of 2.07 mg/l air of Alanap Technical Grade. Body weight gains were determined after a 14-day observation period and all rats were necropsied.

C. RESULTS: No deaths occurred. Average body weight gains were 116 grams for males and 42 grams for females. All rats exhibited dyspnea, red nasal discharge and salivation following exposure; these signs lasted greater than 8 but less than 18 hours. It was stated that necropsy did not reveal any gross pathologic alterations that were attributed to the effects of the test material. No supporting data were provided for this statement.

Particle size determination revealed that all particles were greater than 25 microns.

D. CANADIAN VALIDATION: The sponsor provided a copy of the audit and validation of this IBT study by the Bureau of Chemical Safety, Health Protection Branch (HPB), Health and Welfare, Canada, stating that the "study had been deemed to be acceptable to both EPA and HPB". This means only that the report is supported by raw data. An evaluation, as done here, establishes whether the study meets current registration requirements for this type of study.

END