

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20450

186A

MEMORANDUM

OFFICE OF TOXIC SITE HANCES

SUBJECT: Validation Review of IST Study 7. 7113 Three Phase Reproduction

Study in Albino Pats of Irgasan

FROIT: Gary J. Burin 53

Toxicology Branch, HED (TS-769)

TO: Jan Auerbach, Chief

SPCO (TS-701)

THRU: William Burnam, Acting Chief

Toxicology Eranch, HET (TS-750)

Rased upon my evaluation of the SPRD "Preliminary Review", the sponsor validation report and the final report itself, it is recommended that the teratology phase of this study be considered invalid and the reproductive phase of this study be considered supplementary data. The basis for these recommendations include the following:

- 1. The primary reason for the classification of the teratology study is the lack of raw data to support findings recarding visceral or skeletal examinations of progeny.
- 2. Diet preparation records are missing for both the teratelogy and reproductive phases of this study. Food consumption was only measured for a 5 day period of the reproductive phase.

Deficiencies noted below pertain to the reproductive phase of the study;

- 3. No written records exist to document daily observations of behavior or nortality.
- 4. Final report states that each female was given a maximum of 2 different males. Raw data shows that some females were given as many as 5 different males.

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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

ENDJECT: EPA (HED) Review of IBT Validation Report From Cary Eura T. BryHED (TS.TLY) Branch Chief 20: Regulatory Inalysis and Lab Audits Branch Special Pesticide Review Division Validation Submitted by: Ciba-Seign Date of Validation: 2/2-1/20. IBT Report Number: 6 2113 Date of Final Report: 5/1/9 Type of Study: Three Philes Richard The Till Compound: . EPA Accession Number: Registrant Validation Report BEST AVAILABLE COPY IBT Report Submitted to EPA Conclusions: NO CONCLUSION V Supplementary Duty (Reproduction Prise)