6-26-80 IBT-1449 TXR-1481

EPA

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MEMORANDUM NOTE DE SERVICE

001481

TO / A: Mr. D. J. Clegg,
Head, Pesticide Section,
Toxicological Evaluation Division.

FROM / DE: Pesticide Section,
Toxicological EValuation Division.

SECURITY CLASSIFICATION - DE SECURITE

OUR FILE - NOTRE REFERENCE

YOUR FILE - VOTRE REFERENCE

DATE: June 26, 1980.

SUBJECT / OBJET: Audit & Validation of the Study: "Teratogenic Study on Phaltan".

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IBT No.: WCRF-139 (this number was found on raw data; the final report has no report number).

Dated February 15, 1966.

Common name: Folpet.

Trade name: Phaltan.

Petitioner: Chevron Chemical Co.
Ortho Division.

OVERALL COMMENTS: The raw data available on microfiche were verified and compared with the results given in the final report. These raw data, with few inconsequential errors and discrepancies, were found to support basically the results given in the final report. In this context therefore the present study is valid.

When the scientific value of the present study is considered, its validity becomes strongly questionable. This is particularly true when the present standards of methodology and experimental design are taken into account.

"Teratogenic Study on Phaltan"

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AUDIT:

1. Report No.: IBT No.: WCRF-139. (This number was found on raw data; the final report has no number. This number could be also J-139, according to some raw data).

   Dated February 15, 1966.

2. Date of Study: Proposed starting date: July 12, 1965 (0 Day).

   Proposed termination date: Aug. 9, 1965 (28th day of pre

3. Sponsor: Chevron Chemical Company
   Ortho Division.

4. Protocol: Hand written protocol for the combined study on Phaltan, Captan and Difolatan using single dose of 75 mg/kg and Thalido (75 mg/kg) as positive control in additi to control group, is available on microfi It basically outlined the procedure given in the final report.

5. Test material: No information is available on microfiche regarding the test material.

6. Animal suitability: Dutch-Belted rabbits were apparently used. Their mating records, maternal body weigh at 0 Day are available on raw data.

7. Raw data: Handwritten records, sufficient to compar with the results given in the final repor

VALIDATION OF EVALUATION:

1. Dates: Dates varied from group to group as follow

Group	0 Day	Euthanasia (28th Day)
Control	7-10-1965	8-7-1965
Thalidomide	7-16-1965	8-13-1965
Phaltan	7-12-1965	8-9-1965

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2. Protocol: "Proposed" Protocol was apparently followed.

3. Test material: No information available on microfiche.

4. Personnel: Report prepared by: Margaret Ives, Ph.D. Chief Toxicologist.

Report approved by: J. C. Calandra, Ph.D., Director.

Handwritten reports are initialled (illegi and many are signed by Al "Wahli".

EXECUTION OF THE STUDY:

The information available on microfiche consists of a copy of each of the followir final reports, having the same IBT report number: WCRF-139 - (i) "Teratogenic Study on Difolatan" (Dated Dec. 6, 1965; using Dutch Belted rabbits; (ii) "Teratogenic Study on Captan" (Dated Feb. 14, 1966; using Dutch Belted rabbits), (iii) "Terato Study on Phaltan" (Dated Feb. 15, 1966; u Dutch Belted rabbits), "Rabbit Reproducti Study - Phaltan" (Dated Aug. 20, 1965; usi Dutch Belted rabbits), "Rabbit Reproducti Study-Captan" (Dated Aug. 25, 1965; using Dutch Belted rabbits), "Rabbit Reproducti Study - Difolatan" (Dated Aug. 25, 1965; Dutch Belted rabbits). Microfiche contai also some correspondence, financial state handwritten protocol and raw data for chicken reproduction study on captan (IBT No. WCRF-139)", and handwritten protocol and raw data for concurrent teratogenic studies on Captan, Folpet and Captofol.

Raw data records covering body weights (Table I of the final report) progeny data (Table II) and observation of viable young during incubation (Table III) were verific and compared with the results given in the final report. The available raw data basi support the results given in the final rep Some minor discrepancies were found (same as in the sponsor's audit , but they are d mostly to rounding the second decimal in the body weight results.

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The annotations on some individual pathology records (e.g. does nos. 45, 47, 48) states: "extreme sepsis", "very moderate sepsis", "no sepsis". Evidence for the presence or absence of "sepsis" is not provided, since neither t Histopathological nor microbiological examinations or tests were apparently mad Judging from the use of the term "sepsis' as seen on raw data, one is inevitably inclined to question the professional com petence of the person performing the autopsies.

OVERALL COMMENTS:

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