

Memorandum

TO : Mr. William Stokes
Petitions Control Branch (SC-13)

FROM : Dr. G. E. Whitmore
Division of Pharmacology and Toxicology
Petitions Review Branch (SC-970)

SUBJECT: Daconil (DAC 2787) Addendum memorandum

DATE: June 30, 1969

PESTICIDE PETITION NO. ⁹7FO-743Diamond Shamrock Company
Painesville, Ohio 44077
(AF 25-202)

A PRB examination of the unfiled dog feeding study (Project 200-206) and a discussion with Dr. E. Long has prompted this supplemental memorandum. This memorandum will possibly explain in more detail the need for additional information related to the establishment of a dog no-effect level.

The 1 year progress report (Project 200-206) of the 2 year DAC Technical feeding study wherein dogs are being fed 60 and 120 ppm diets for the purpose of, ".... to characterize and evaluate the chronic oral toxicity of Daconil 2787 and establish a "no-effect level in dogs," has not demonstrated a no-effect as judged by the listed microscopic kidney tissue reactions. As reviewed by Dr. E. Long, compound related reactions were apparent in the kidneys of the 60 ppm males with similar, more prominent, changes in the 120 ppm males. The female's kidneys were unaffected. The summary of the investigating laboratory claims compound related microscopic kidney lesions were absent in both sexes consuming 60 ppm diets.

A dog study of the DAC Mixture (see Dr. Long's memo May 16, 1969) of 16 weeks duration at diet levels of 0, 250, 500 and 750 ppm (Dr. Long's memo January 31, 1969) did not demonstrate compound related kidney cell alterations. A possible compound effect was a dose related PBI increase. Thyroid tissue was described as histologically normal.

The apparent reasons for the 2nd 2-year dog study (Project 200-206) were the composition changes in DAC Technical and the suggested effect on PBI in the subacute study mentioned above.

The significance of these kidney reactions, related to possible residue tolerances, cannot be assessed at this time. Dr. Long is of the opinion that the completed study (2 years) will allow an assessment of the significance of these lesions. DPT concurs with this opinion.

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The 1 year progress report of the dog 2 year DAC Technical study (Project 200-206) was not submitted to PCB as a petition supplement. This supplement was left with Dr. Long (April 4 conference) and was subsequently evaluated (memo May 16, 1969). As of May 16, PRB was basing an opinion of a possible dog no-effect diet on the subacute dog study with fed levels of 0, 250, 500, and 750 ppm of the DAC mixture compound. Had the supplement (Project 200-206) been properly filed by the Petitioner with PCB an early decision could have been made in respect to the significance of this supplement.

INIT:HBlumenthal

cc: SC-970 (Dr. Whitmore)
SC-300
SC-310
VM-100
SC-940 (Drs. HLRichardson, MERichardson &
ELLong (2), KJDavis
PP No. 9FO-743

GEWhitmore:dps 6-30-69