



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DEC 11 1986

MEMORANDUM

Subject: Resubmission of Protocol on Rabon Dog Collar

To: George LaRocca, PM-15  
Registration Division, TS-767C

From: Marcia van Gemert, Ph.D.  
Head, Section III  
Toxicology Branch, HED

*M. van Gemert 12.9.86*

*557-1121*

Thru: Theodore M. Farber, Ph.D.  
Chief, Toxicology Branch, HED

*W. Farber 12/10/86*

Hartz Mountain Corp. has submitted some information to finalize a dog study protocol. These include the following modifications:

1. "Since the comfort factor exists with using 3 dog collars on pregnant bitches, and since it is not feasible to properly place 3 collars on 4-week old puppies", they agreed that the three groups would consist of:

- a. A placebo collar
- b. One Rabon collar on each dog,
- c. Two rabon collars on each dog.

They agreed to assay each collar prior to placement on dogs and at the conclusion of the test to provide exposure information on each animal.

2. They believe it isn't feasible to have all animals start the study on the same day, particularly since these dogs are to be selected for the study when they enter the proestrous phase. All 18 dogs won't be cycling together. The groups will therefore be completed over a 7-14 day period. Mr. Backus of Section III, Toxicology Branch already agreed to this accommodation to the cycling of the animals.

3. They agreed to a change of analytical method to accommodate smaller blood samples. Four-week old puppies cannot be bled frequently, taking 5-7 ml samples.

They stated that the study should begin between March 31, and April 15, 1986, and last approximately 6 months. They also estimate that 3 months will be necessary to prepare the data and final report. They anticipate that the report will be submitted around April 1, 1987.