



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

9-22-83

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM:

SUBJECT: NLAP-1. Comments on audit of a Bayleton cow metabolism study.

FROM: Edward Zager, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Henry Jacoby, PM 21
Registration Division (TS-767)

We have been requested to comment on the data audit of the study "Metabolism of Bayleton in the Cow" (Mobay Chemical Corp. Report No 66202) conducted at the request of the OPP National Laboratory Audit Program.

The study was submitted in support of PP#0G2300 and was reviewed in detail by J. M Worthington (memo of 4/10/80). In the study one cow received a single dose of ^{14}C -benzene ring labeled Bayleton at the rate of 0.14 mg/kg while another cow received the triazole ring labeled material for five days at the rate of 10 mg/kg.

The investigators' objections include the following: weight of the cow although reported in the final report as 401 kg, was not recorded in the raw data; analytical reports include data for milk up to 56 hrs after dosing but raw data show weight of milk collected only up to 48 hrs; the milk was not analyzed.

Our Comment

According to the report 66202 reviewed by RCB the milk was analyzed and showed low level activity consistent with other tissues.

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We consider the other deficiencies found by the investigator to be minor.

Conclusions

We consider the study valid.

TS-769:RCB:E.Zager:cdw:CM#2:Rm810:X77324:9/21/83

cc: R.F., Circu., Reviewer, Bayleton S.F., IBT Validation S.F.
PP#0G2300 **PP3FR938**

RDI: R. Hummel, 9/21/83; R. Schmitt, 9/21/83