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

6-1390  
CASWELL FILE

JUN - 1 1990

MEMORANDUM

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: Case # 410. Allethrin Registration Standard. Response to Protocol Question Concerning General Metabolism Study: Analysis of Rat Feces and Urine.

Tox. Chem. No. 25, 25A  
Project No. 0-1288

TO: Richard King, PM/RM Team No. 74  
Review Manager for Reregistration of Allethrin  
Special Review and Reregistration Division (H7508C)

FROM: Pamela M. Hurley Ph.D., Toxicologist  
Section I, Toxicology Branch I  
Insecticide, Rodenticide Support  
Health Effects Division (H7509C)

*Pamela M. Hurley*  
5/18/90

THRU: Roger L. Gardner, Acting Section Head  
Section I, Toxicology Branch I  
Insecticide, Rodenticide Support  
Health Effects Division (H7509C)

*Roger Gardner*  
5-18-90 KB 5/25/90

Record No(s). 264445

Background and Request:

Sumitomo Chemical Company and Roussel Uclaf are co-sponsoring a general metabolism study for allethrin. On May 10, 1990, the Toxicology Branch (TB-I) had a discussion with the Registrants' representative via telephone concerning the analyses of the urine and feces samples that were to be collected at specified time intervals. The representative asked if the Agency required that these waste products be analysed individually from each animal per group per time period or that waste products be composited from all animals in each group per time period. TB-I suggested that the analyses could be composited, since often there may be insufficient material from the single animals to allow for an adequate analysis. The Registrants subsequently have submitted a letter to the Agency summarizing the telephone conversation and have requested a concurrence on the content of the conversation.

Toxicology Branch Response:

During the telephone conversation with the Registrants' representative, The Toxicology Branch did offer the recommendation that the analyses could be composited where method sensitivity precludes determinations based on individual animals. Toxicology Branch wishes to emphasize that the Agency is only in the position to offer recommendations and that the outcome of the study is the responsibility of the Registrant (testing laboratory).

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Allethrin

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Thursday, May 10, 1990

Telephone Conversation 3:15 PM

Spoke with Dr. Robin Todd (Representative for Sumitomo)

301-747-4500

Re: 85-1 Rat Metabolism

Wanted to know if urine and feces samples could be pooled rather than using individual animals. After conferring with Mike Lannon, I told him that the urine samples and feces samples should be pooled (separately) for each timepoint because they may not get enough to analyze from each individual rat. However, the timepoints need to be pooled separately, not together. They are sending a letter of confirmation of our conversation.

Pamela Hurley