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CASWELL FILE

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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: NALED---Toxicology Studies Submitted Under MRID's
00085409 and 000885410, to Satisfy Metabolism
Requirement
ID #034401

Chemical: 034401 (586)
RD Record: S-433871
HED Project: D187057

FROM: Irving Mauer, Ph.D., Geneticist
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08.27-93

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THRU: Karl P. Baetcke, Ph.D., Chief
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Karl P. Baetcke
8/27 93

Registrant: Chevron Chemical, Richmond, CA

Review: Review and evaluate the following studies, both performed at Chevron's Agricultural Chemicals Division, and submitted to satisfy the data requirement for GDLN 85-1---Rat Metabolism:

- (1) Metabolism of [Ethyl-1-¹⁴C]-NALED in Rats: Characterization and Quantification, of ¹⁴C in Tissues, unpublished study by H. M. Cheng and Y. S. Chen, Agricultural Chemicals Division (Chevron), File 721.14, dated June 9, 1981.
- (2) Metabolism of [Ethyl-1-¹⁴C]-NALED in Rats: ¹⁴C Excretion Pattern, unpublished study by H. M. Cheng, Agricultural Chemicals Division (Chevron), File 721.14/NALED, dated May 29, 1981.

TB CONCLUSION: Preliminary screening of these older studies (by Doctors P. Chin and I. Mauer) reveal that neither, singly or in combination, meets the data requirements for GDLN 85-1, since:

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- (1) Only single animals were employed for each stage of the assay.
- (2) Not all tissues mandated by FIFRA requirements were sampled.
- (3) Neither high-dose or multiple dose segments were performed.
- (4) Sampling was for too brief a period post-dose.

Hence, these studies (collectively) are judged UNACCEPTABLE.