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

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MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: DEET (N,N-diethyltoluamide): Review of a Neurotoxicity Study Outline

TO: Joseph Tavano
Product Manager, Team 17
Registration Division (TS-767c)

THRU: Judith W. Hauswirth, Ph.D. *M. G. P. 3/24/88 F. J. H.*
Section Head, Section VI
Toxicology Branch
Hazard Evaluation Division (TS-769c)

FROM: William F. Sette, Ph.D. *William F. Sette 3/30/88*
Environmental Protection Specialist
Toxicology Branch
Hazard Evaluation Division (TS-769c) *W. F. Sette 4/1/88*

In response to a request by EPA, the Chemical Specialties Manufacturers Association in a memo dated 3/18/88 has submitted a detailed outline of a neurotoxicity study using F2 generation rats from an ongoing reproduction study. As requested, I am providing my comments on the proposed study outline.

The 2 proposed studies should provide useful information on:
the functional neurological consequences of acute exposure to adults;

and both the functional neurological and neuropathological effects in adults of exposure prior to birth, during post-weaning development, and into adulthood. By itself, these data will not provide a clear indication of the relative sensitivity, if any, of developing organisms.

At the level of detail provided, the proposed study would appear to conform to our guidelines for neurotoxicity testing. My specific comments are minor and follow.

Effects observed in week 1 in the observational battery should be pursued in later weeks to obtain some indication of duration of effect.

Historical control data, including coefficients of variations for behavioral measures (assumed to be 20-25%), should be provided;

Pair-wise comparisons of incidence of pathological effects
seen should be included.

cc: M. Van Gemert
W. Phang

DEET toxicology review

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