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

MEMORANDUM SEP 29 1982

TO: Richard Mountfort (23)  
Registration Division (TS-767)

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

THRU: Orville E. Paynter, Chief  
Toxicology Branch  
Hazard Evaluation Division (TS-769)

SUBJECT: Additional Comments on Thidiazuron Rat Teratology  
Studies. Acc. No.: 070129 CASWELL#659A

Background Information:

In my review of May 6, 1982, I requested an explanation for the increased post implantation fetolethality noted at each dose level in the initial teratology study conducted at Reprotox GmbH of Munster, West Germany. The observed response was not dose related and was not observed in a repeat of the study.

Recommendation/Discussion:

Additional information has been submitted by the registrant, Nor-Am Agricultural Products.

No definitive explanation for the findings has been offered. However, it appears that a problem in achieving a uniform suspension of test substance is the most likely explanation for the difference in study results between the first and second studies as the only substantial difference in the conduct of the studies appears to have been a change in vehicle (from carboxymethylcellulose to Myrj 53/NaCl).

It is recommended that the repeat study be used to support registration as it is unlikely that further elucidation of the results of the initial study is possible.

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*9/14/82*

*10/11/82*

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