CHEMICALS UNDER CONSIDERATION FOR POSSIBLE LISTING AS DEVELOPMENTAL AND REPRODUCTIVE TOXICANTS (DARTS) VIA THE AUTHORITATIVE BODIES MECHANISM: METHAZOLE, IDENTIFIED BY U.S. EPA

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Methazole may meet the criteria for listing under Proposition 65 via the authoritative bodies listing mechanism. The regulatory guidance for listing by this mechanism is set forth in Title 22, California Code of Regulations, Section 12306 (22 CCR 12306). For example, the regulations include provisions covering the criteria for evaluating the documentation and scientific findings by the authoritative body to determine whether listing under Proposition 65 is required.

The U.S. Environmental Protection Agency (U.S. EPA) has been identified as an authoritative body for purposes of Proposition 65 (22 CCR 12306(1)) and has identified methazole as causing developmental or reproductive toxicity. This was done by that Agency in implementing its Toxic Release Inventory (TRI) program (*i.e.*, Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA)). On the basis of identifying chemicals which caused reproductive, developmental and/or other toxicities the U.S. EPA added a number of chemicals to the TRI list. The U.S. EPA published its toxicity findings in the *Federal Register* (**59**:1788-1859, 1994 and **59**:61432-61485, 1994). In proposing specific chemicals for addition to the TRI list, the Agency stated that a hazard assessment was performed for each candidate, "...in accordance with relevant EPA guidelines for each adverse human health or environmental effect..." (*Federal Register* **59**:1790).

OEHHA has found that methazole has been "formally identified" as causing reproductive toxicity according to the regulations covering this issue (22 CCR 12306(d)) because the chemical has "been identified as causing ... reproductive toxicity by the authoritative body" (*i.e.*, U.S. EPA) "in a document that indicates that such identification is a final action" (*i.e.*, the TRI *Final Rule* (*Federal Register* **59**:61432)) and has "been included on a list of chemicals causing ... reproductive toxicity issued by the authoritative body" "and the document specifically and accurately identifies the chemical" and has been "published by the authoritative body in a publication, such as, but not limited to the federal register..."

OEHHA also finds that the criteria for "as causing reproductive toxicity" given in regulation (22 CCR 12306(g)) appear to have been satisfied for methazole (CAS No. 20354-26-1). In making this evaluation, OEHHA relied upon the documents and reports cited by U.S. EPA in making their finding that this chemical causes reproductive toxicity (for the developmental endpoint). OEHHA consulted additional sources of information on the specific studies cited

by U.S. EPA. This was done only where necessary to affirm or clarify details of results and study design for studies cited by U.S. EPA.

The study cited by U.S. EPA in making findings with regard to the reproductive toxicity of methazole is discussed below. The statement in bold reflects data and conclusions which appear to satisfy the criteria for sufficiency of evidence for reproductive toxicity in regulation (22 CCR 12306[g]). Where NOELs (no-observed-effect-level), LOELs (lowest-observed-effect-level), or LELs (lowest-effect-level) are included in the study descriptions below, they are quoted directly from the cited references.

Methazole (CAS No. 20354-26-1)

Developmental toxicity was evidenced by increased embryolethality in rabbits.

The U.S. EPA (1994a and 1994b) concluded that, "...there is sufficient evidence for listing methazole on EPCRA section 313 pursuant to EPCRA section 313(d)(2)(B) based on the available developmental toxicity data for this chemical."

Supporting documentation for the TRI listing (U.S. EPA, 1993) states, "Rabbits receiving 30 or 60 mg/kg/day by gavage on days 6 to 18 of gestation exhibited increased embryolethality. The NOEL was 10 mg/kg/day (76 [U.S. EPA, 1978])."

With regard to the study cited as supporting U.S. EPA's action in adding a chemical to the EPCRA-TRI list, OEHHA has examined the memorandum reviewing the study and finds that the evidence for DART effects appears to meet the criteria of 22 CCR 12306, and notes the following:

1. Adequacy of the experimental design:

Rabbit developmental toxicity study was classified as core minimal (U.S. EPA, 1978).

2. Route of administration:

Not stated, appears to be oral, gavage

3. The frequency and duration of exposure:

Gestation days 6-18; appears to have been once per day.

4. The numbers of test animals:

Not stated, but relevant U.S. EPA guidelines specify a minimum of 12 pregnant rabbits per treatment group (U.S. EPA, 1983)

5. The choice of species:

Rabbits are typically used in toxicity testing.

6. The choice of dosage levels:

0, 10, 30, or 60 mg/kg/day, plus a positive control group receiving 150 mg/kg/day of thalidomide.

7. Maternal toxicity:

Number of maternal deaths, corpora lutea, implantation sites, fetal weight and development at all dose levels was stated not to differ from untreated controls.

References

U.S. Environmental Protection Agency (U.S. EPA, 1978). Memorandum from John Doherty to Product Manager entitled "*Request for tolerance for pesticide methazole and its metabolites in or on potatoes at 0.1 ppm.*" Dated (February 28, 1978) [actual date on memo is January, 1978].

U.S. Environmental Protection Agency (U.S. EPA, 1983). *Health Effects Test Guidelines; Teratogenicity Study.* Office of Toxic Substances, Office of Pesticides and Toxic Substances.

U.S. Environmental Protection Agency (U.S. EPA, 1993). Support Document for the Addition of Chemicals from Federal Insecticide, Fungicide, Rodenticide Act (FIFRA) Active Ingredients to EPCRA Section 313. U.S. EPA Office of Pesticide Programs, Washington, DC.

U.S. Environmental Protection Agency (U.S. EPA, 1994a). *Proposed Rule: Addition of Certain Chemicals; Toxic Chemical Release Reporting; Community Right to Know. Federal Register* **59**: 1788.

U.S. Environmental Protection Agency (U.S.EPA, 1994b). *Final Rule: Addition of Certain Chemicals; Toxic Chemical Release Reporting; Community Right to Know*. Federal Register **59**(229): 61432.