

# **Exhibit 14**

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



Office of Chemical Safety & Pollution Prevention

**MEMORANDUM**

**Date:** November 16, 2017

**SUBJECT:** DCPA: HED Review of the Comparative Thyroid Assay Range-Finding Study and Thyroid Hormone Methods Data.

**PC Code:** 078701  
**Decision No.:** NA  
**Petition No.:** NA  
**Risk Assessment Type:** NA  
**TXR No.:** 0057666  
**MRID No.:** NA

**DP Barcode:** D444017  
**Registration No.:** NA  
**Regulatory Action:**  
**Case No.:** NA  
**CAS No.:** 1861-32-1  
**40 CFR:** 180.185

**FROM:** Linda Taylor, Ph.D. *Assess For* 11/16/2017  
Risk Assessment Branch VII  
Health Effects Division (7509P)

**THRU:** Michael Metzger, Branch Chief *Michael S. Metzger*  
Risk Assessment Branch VII  
Health Effects Division (7509P)

**TO:** Jordan Page, Risk Manager Reviewer  
Risk Management and Implementation Branch 2  
Pesticide Re-evaluation Division (7508P)

**I. CONCLUSIONS:** A new range-finding pre- and post-natal developmental thyroid study using the HPLC-MS-MS method for T4, TSH, and T3 in serum is required. The study should incorporate all aspects (data the current Phases II and III were to provide) such that the results will directly determine the dose levels, time points, and whether pups will need to be dosed directly in the definitive comparative thyroid study.

**II. ACTION REQUESTED:** Please review the revised protocol for the DCPA comparative thyroid test, which was modified after HED's previous assessments of the original protocol.

**III. BACKGROUND:** Although this action is listed as a protocol review, the primary request was for an assessment of the dose levels and time point to be used in the next phases of the range-finding study. This is the third HED review of the protocol for the comparative thyroid assay (CTA) for DCPA (see TXR# 0056835, dated 11/19/2013 and TXR# 0054026, dated 4/16/2015 for previous reviews). For the current action, the registrant submitted (*via* email) the results of a dose range-finding (DRF) pre- and post-natal developmental thyroid study (Envigo Study BDG0204) and requested comment on their dose selection (0, 0.1, 1, 10, or 100 mg/kg/day) and time-point (2 hours) for thyroid assessment for use in Phase II and Phase III of the DRF study. The results submitted in the current action are those from a repeat of the Phase I of the DRF study (Phase 1a) since problems with the thyroid assay methodology were encountered in the first Phase 1 study.

Subsequent to the request for approval of their dose levels and time point, Amvac submitted (1) the positive control (PTU) pre- and postnatal developmental thyroid study report (MRID 50357301), which was listed in the 2015 protocol review as required; (2) a validation report (HLS0980) for the immunoassay method used for TSH assessment in Phase 1a and the PTU studies; and (3) additional information on thyroid hormone assay methodology [validation for the GC-MS/MS method (FF58YR)] used in Phase 1a for T4 and T3 assessment and scheduled for use in the subsequent phases of the DRF study.

The validation data for TSH for the HPLC MS/MS method has not been submitted to date.

**IV. RESULTS/DISCUSSION:** The protocol revision, thyroid hormone assay methodology, Phase 1a thyroid hormone results, and dose levels and time point selection were discussed by HED's Toxicology Science Advisory Council (ToxSAC) on October 19, 2017, *four years after the original protocol was reviewed and 2.5 years after the original Data Call-In (DCI) due date for completion of the CTA (January, 2015)*. The following concerns were identified with respect to the DCPA developmental thyroid studies (BDG0204).

1) ToxSAC concurs with the HPLC-MS-MS approach for thyroid hormone assessment (all three hormones in serum) and, if the TSH validation data are adequate, it will then be necessary to perform **a new range-finding study** using this HPLC-MS-MS method and the dose levels used previously. This new RF study should provide thyroid hormone (T4, TSH, T3 in serum) data and ***incorporate all aspects (whatever measures the current BDG0204 Phases II and III were to assess) such that the results will directly determine the dose levels, time points, and whether pups will need to be dosed directly in the definitive study.*** Measurement of the thyroid hormones should be at the same time of day, preferably in the morning. Thyroid hormone data are needed for the GD 20 dams, fetuses, and LD 4, LD 14, LD 21 pups. Dosing of the dams should be continued until PND 14 (until the pups begin to eat the feed); gavage dosing of the pups should be from PND 7 to PND 20/21 (current Phase III).

2) To address whether DCPA gets into the milk, the milk sampling method should be clarified. Frequent milk samples should be taken (Day 1, 7, 14, and 21). Additionally, it would be useful to know how long DCPA stays in the milk after dosing has stopped.

3) The dose levels to be used in the definitive study (Envigo Study # BDG0202) are contingent on the results of the new RF study, which will need to be re-assessed by ToxSAC before the definitive study is performed.

4) Validation data for TSH for HPLC MS/MS method are required, which the registrant has stated will be submitted in November, 2017. These data will need to be assessed prior to moving forward with the new RF study (described above).

5) SOPs and the final study protocol for the definitive study need to be submitted to the Agency for review prior to initiation of the definitive study.

6) The PTU study report does not provide any useful data in support of the testing facility's ability to monitor thyroid hormones since the immunoassay method (HLS0980) used, which assessed all three hormones in plasma, is not the method scheduled for use in the definitive study.

7) For the current range-finding study (BDG0204) protocol Phase II, the dams are to be dosed from gestation day (GD) 6 through lactation day (LD) 20/21, but there is no mention of whether the levels of DCPA in the milk will be analyzed in Phase II. Samples of milk should be measured in Phase II (LD 1, 7, 14, and 21). There is no information as to when thyroid hormones are being monitored in this phase in dams and pups. In Phase III, why are the dams dosed only through LD 7 and not through LD 14? Are the levels of DCPA in milk being measured in Phase III? How are the pups being dosed (gavage or through the feed)? The pups would still be nursing on LD 7 and beyond, so double dosing could occur. When are thyroid hormones being assessed in the dams and pups in Phase III? Phase III appears to be more appropriate for the definitive study if it is determined (in Phase II) that DCPA does not get into the milk, in which case the dams could continue to be dosed to Day 20/21. As discussed above, a new range-finding study is required, which should incorporate all of these phases into one study.

**V. CONCLUSION:** A new range-finding pre- and post-natal developmental thyroid study using the HPLC-MS-MS method for T4, TSH, and T3 (in serum) is required. The study should incorporate all aspects (whatever data the current Phases II and III were to provide) such that the results will directly determine the dose levels, time points, and whether pups will need to be dosed directly in the definitive CTA study.