Draft Toxicological Review of *t*-Butanol: Disentangling mechanisms of kidney toxicity and carcinogenicity: Public Comment: LyondellBasell

Gordon C Hard - Independent Consultant DVSc, PhD, DSc DACVP, FRCPath, FRCVS, FAToxSci Tairua, New Zealand

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G C Hard Report on TBA to LyondellBasell, 2005 GC Hard, RH Bruner, SM Cohen, JM Pletcher, KS Regan *Regulatory Toxicol Pharmacol*, 2011

13-week toxicity study – male rats

Hyaline droplet accumulation - angular droplets Granular cast precursors present at OSOM-ISOM border

Granular casts seen in specially-stained kidneys

Two-year carcinogenicity study

**15-month interim sacrifice – male rats** 

Linear papillary mineralization (LPM) present

**Two-year terminal sacrifice** 

LPM in most tumor-bearing male rats Most rats with tumors or ATH had advanced CPN CPN severity in males linked to tumors

- 3.5 versus 2.9

Absence of chemical-related nephrotoxicity in both sexes Hyperplasia of papilla lining a component of CPN

## CONCLUSIONS

- The a2u-g nephropathy evidence is not "limited" but relatively robust
- Tubule cell exfoliation necessitates compensatory regeneration
- The only responses to TBA in rat kidneys are a2u-g nephropathy in males and exacerbated CPN
- Individual animal evidence is sufficient to support advanced CPN as contributing to the RTT response
- TBA male rat renal tumors are adequately explained by a2u-g nephropathy combined with advanced CPN
- Transitional cell hyperplasia in the TBA study is not a nephrotoxic response
- Suppurative inflammation is not a nephrotoxic response but caused by bacterial infection

## TBA – Female rat – High dose

## Transitional cell hyperplasia of papilla

