# Draft Toxicological Review of $t$-Butanol: 

 Disentangling mechanisms of kidney toxicity and carcinogenicity: Public Comment: LyondellBasellGordon C Hard - I ndependent Consultant DVSc, PhD, DSc<br>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, J M 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

## CONCLUSI ONS

- 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
- I ndividual 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



