### 10. ENVIRONMENTAL ASSESSMENT

[CFR 25.31a(b)(4)]

1. DATE: 13 September 1993

2. APPLICANT: Wildlife Pharmaceuticals, Inc.

3. ADDRESS: 1401 Duff Drive, Suite 600

Fort Collins, Colorado 80524

- 4. DESCRIPTION OF PROPOSED ACTION: Wildlife Laboratories requests permission to manufacture and distribute a 50 mg/mL formulation of naltrexone hydrochloride sterile injectable in a 20 mL multi-use vial. This formulation is to be used to administer parenterally to members of the family Cervidae that have been immobilized with carfentanil citrate. The product will be produced by Wildlife Pharmaceuticals, Inc. under GMPs and distributed from Wildlife Pharmaceuticals location at Fort Collins, Colorado. The product will be used on confined and free-ranging members of the native and exotic members of the family Cervidae.
- 5. IDENTIFICATION OF THE CHEMICAL SUBSTANCES THAT ARE TO BE THE SUBJECT OF THE PROPOSED ACTION:
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A. Nomenclature: Naltrexone hydrochloride 17-

(cyclopropylmethyl)-4, 5-epoxy-3, 14 dihydroxy-morphinan-6-one hydrochloride

B. Molecular weight: 377.46

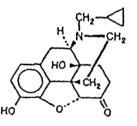
C. Molecular formulae: C<sub>20</sub> H<sub>23</sub> NO₄ HCI

D. Percentage composition: 5.0% Naltrexone HCI

0.2% Methyl and propyl paraben in

a ratio of 9:1

E. Structural formula:



F. Physical description: TREXONIL is a sterile injection which contains naltrexone HCl as the active ingredient. Each mL contains 50 mg of naltrexone HCl, 8.6 mg sodium chloride USP, 2.0 mg methyl paraben and propyl paraben in a ratio of 9:1 and water for injection q.s. ad 1.0 mL. The pH is adjusted with hydrochloride acid or sodium hydroxide.

- G. Additives: Methyl paraben, propyl paraben, sodium chloride
- H. Impurities: None detected

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6. INTRODUCTION OF SUBSTANCES INTO THE ENVIRONMENT: No gaseous, liquid or solid waste substances will be introduced into the environment at the site of production. There are no inactive components that will be emitted to the environment. (See Material Safety Data Sheet - Attachment 2) Attachment #1 to this application is Certification from Wildlife Pharmaceuticals, Inc. that they are in compliance with applicable local, state and federal environmental laws at their manufacturing site in Fort Collins, Colorado. In addition, no substances will be introduced into the environment by Wildlife Pharmaceuticals in the distribution of the finished, sealed, vialed product.

7-11. Not required.

12. LIST OF PREPARERS: W.R. Lance, DVM PhD B. Zimmerman

# 13. CERTIFICATION: (Attachment 1)

14. REFERENCES: See Section 8, Safety and Efficacy and Section 3,Labeling. Copies of references cited have been submitted to the file.



# **CERTIFICATION OF COMPLIANCE**

I certify that Wildlife Pharmaceuticals, Inc. is in compliance with federal, state and local environmental and occupational requirements, as follows:

Environmental

40 CFR 60 & 61 Environmental Protection Agency. Clean Air Act.

13 CR 6, 6-90Colorado Department of Health. Air QualityC.R.S. 1973, as amendedControl Commission. Colorado Air Quality<br/>Control Act.

## **Occupational**

29 CFR 1910 Subpt Z 29 CFR 1910.20(e) Occupational Safety & Health Administration. General Industrial Standards.

The information presented is true, accurate and complete to the best knowledge of Wildlife Pharmaceuticals.

W.R. Lance, DVM PhD President 7 June 1994

Notary Public My commission expires () fober 26, 1996

#### ATTACHMENT 2

#### NALTREXONE HYDROCHLORIDE

#### Material Safety Data Sheet

Effective Date: 04/24/86

Supercedes : 02/03/86

Mallinckrodt, Inc. P.O. Box 5439 St. Louis, Mo. 63147 Emergency Telephone Number 314/539-1600

Product Identification:

Synonyms: 17-(cyclopropylmethyl)-4,5-epoxy-3, 14 dihydroxy-morphinan-6-one hydrochloride; narcotic antagonist

Chemical Formula: C20H23NO4·HCl

Formula CAS No.: 16676-29-2

Molecular Weight: 377.46

Hazardous Ingredients: Naltrexone Hydrochloride.

#### PRECAUTIONARY MEASURES

WARNING MAY BE HARMFUL IF SWALLOWED.

Avoid breathing dust. Keep container closed. Use with adequate ventilation. Wash thoroughly after handling.

#### EMERGENCY/FIRST AID

If large amounts were swallowed, give water to drink and get medical advice. If inhaled, remove to fresh air. Get medical attention for any breathing difficulty.

SEE SECTION 5.

DOT Hazard Class: Not Regulated

Physical Data

SECTION 1

Appearance:	White powder			
Odor:	Odorless.			
Solubility:	Soluble in water.			
Boiling Point:	No information found.			
Melting Point:	274-276 <sup>o</sup> C (525-529 <sup>o</sup> F)			
Specific Gravity:	ca.1.3			
Vapor Density (Air=1):	No information found.			
Vapor Pressure (mm Hg)	No information found.			
Evaporation Rate:	No information found.			

NALID - NALIREXONE HYDROCHLORIDE

Mallinckrodt, Inc.

Health Hazard Information

SECTION 5

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A. Exposure/Health Effects

Inhalation:

Ingestion:

Skin contact:

Eye contact:

Inhalation of dust may irritate the respiratory tract.

Narcotic antagonist. Although not considered highly toxic, the acute toxic syndrome in non-opiod dependent subjects is not well defined. May produce constricted pupils. May cause difficult sleeping, anxiety, nervousness, abdominal pain, vomiting, and headache. Large doses may cause liver damage.

Not expected to cause any adverse health effects.

No adverse effects expected but dust may cause mechanical irritation.

Chronic Exposure:

No information found.

Aggravation of Pre-existing Conditions:

Produces acute withdrawl symptoms in individuals physically dependent on opicds. Persons with impaired kidney or liver function may be more susceptible to the effects of the substance.

B. FIRST AID

Inhalation:

Ingestion:

Skin contact:

Eye contact:

Wash exposed area with soap and water. Get medical advice if irritation develops.

In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Call a physician.

Remove to fresh air. Get medical attention for any breathing difficulty.

If large amounts were swallowed, give water to drink and get medical advice.

<u>C. TOXICITY DATA</u> (RTECS, 1982)

No ID50/IC50 information found relating to normal routes of occupational exposure. Mutation references cited. Information in drug literature indicates this substance has been shown to have embryocidal effects in experimental animals at large doses.

NALID - NALIREXONE HYDROCHLORIDE

Mallinckrodt, Inc.

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### Addendum to Material Safety Data Sheet

#### REGULATORY STATUS

	Hazard Categories for SARA Section 311/312 Reporting					
	Acute X	Chronic	Fire	Pressure	Reactive	
Products or Components of Product:		CERCLA Sec.103 RQ lbs	RCRA Sec. 261.33	SARA EHS Sec. 302 RQ TPQ	SARA 313 Chemicals Name Chemical List Category	
NALTREXONE HYDROCHLORIDE (16676-29-2)		No	No	No No	No No	

SARA Section 302 EHS RQ: Reportable Quantity of Extremely Hazardous Substance, listed at 40 CFR 355.

SARA Section 302 EHS TPQ: Threshold Planning Quantity of Extremely Hazardous Substance. An asterick (\*) following a Threshold Planning Quantity signifies that if the material is a solid and has a particle size equal to or larger than 100 micrometers, the Threshold Planning Quantity = 10,000 LBS.

SARA Section 313 Chemicals: Toxic Substances subject to annual release reporting requirements listed at 40 CFR 372.65.

CERCLA Sec. 103: Comprehensive Environmental Response, Compensation and Liability Act (Superfund). Releases to air, land or water of these hazardous substances which exceed the Reportable Quantity (RQ) must be reported to the National Response Center, (800-424-8802); Listed at 40 CFR 302.4

RCRA:

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Resource Conservation and Reclamation Act. Commercial chemical product wastes designated as acute hazards and toxic under 40 CFR 261.33

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