

Chem File

1 file

March 13, 1991

**MEMORANDUM**

**SUBJECT:** Transmittal of EFED List B Review for (Case #  
2205; Chemicals # 067701 and # 067705)

**FROM:** Amy Rispin, Chief  
Science Analysis and Coordinatin Staff  
Environmental Fate and Effects Division

**TO:** Jay Ellenberger, Chief  
Generic Chemical Support Branch  
Special Review and Reregistration Division

Attached please find the following documents for the completed  
EFED review of *Prometon*

1. EFGWB review and data requirements table
2. EEB review and DERs
3. SACS Reregistration Summary Report

If you have any questions concerning this case, please contact  
Martha Sager at 557-7682.

cc (with SACS Reregistration Summary Report attached)

Anne Barton	Hank Jacoby
Paul Schuda	Jim Akerman
List B File	Doug Urban
List B Cover Memo File	

SACS REREGISTRATION SUMMARY REPORT  
for Phase IV

FROM: Martha Sager  
Date:

3/15/91

THRU: Amy Rispin

*Amy Rispin*

TO:

Active Ingredient: Prometon

List     B    

2,4-BIS(ISIPROPYLAMINO)-6-METHYOXY-S-TRIAZINE

1. Intro/History

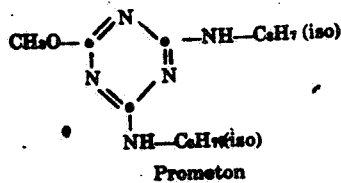
History Prometon; a non-selective triazine herbicide which can be applied before or following weed emergence. Prometon controls most annual and some perennial weeds and grasses, generally for a full season or longer. Prometon is also called Pramitol. Prometon as a shelf life of 3 to 5 years when stored in dry conditions with minimum temperature conditions. Prometon was listed among EPA's Priority Pesticide List in 1990. EPA has set a Lifetime Health Advisory level for prometon in drinking water at 100 micrograms per liter. Prometon was included in EPA'S Ground Water Monitoring Study in 1990 because of its' propensity for leaching into ground water, its prior occurrence in ground water, the high volume of sales of Prometon in the USA, and because of concerns about health effects.

2. Use Pattern (Sites) and Application Rate.

Terrestrial non-food crop -----out bldgs, hedgerows  
Terrestrial non-food/ residential-----paths, patios, private  
Aquatic non-food, industrial-----drainage systems  
Indoor Food-----farm structures, etc.

3. Registration Information

- A. Kind of pesticide.  
Herbicide
- B. Target pest.  
Pre and Post emergent weeds
- C. Method of application.  
Spray at ground level; spot-treat; broadcast
- D. Formulation Issues and Structure:

4. Formulation Issues and Chemical Structure5. EEB Disciplinary Summary to Highlight Special Issues

Data Requirements which have NOT been fulfilled:

- 71-4 (a) Avian Reproduction/Quail
- 71-4 (b) Avian Reproduction/Duck
- 72-3 (b) Acute Estu/Mari Tox Mollusk
- 72-4 (a) Early Life Stage Fish
- 72-4 (b) Life Cycle Aquatic Invertebrates

EEB Disciplinary Summary:

Data Requirements which HAVE been fulfilled:

- 71-1(a) Acute Avian Oral, Quail
- 71-2(a) Acute Avian Diet, Quail
- 71-2(b) Acute Avian Diet, Duck

Data Requirements In Review:

- 72-1(a) Acute fish toxicity/Bluegill
- 72-1(c) Acute fish toxicity/Rainbow Trout
- 72-2(a) Acute aquatic Invert.Toxicity
- 72-3(a) Acute mari/estu tox. fish
- 72-3(c) Acute est/mari tox. Shrimp
- 123-1(a) Seed germination- Seedling emergence
- 123-1(b) Vegetative vigor
- 123-2 Aquatic plant growth
- 141-1 Honey Bee Acute Contact

EFGWB Disciplinary Summary

Data Requirements which HAVE been fulfilled:

Degradation Studies - Lab:

161-1 Hydrolysis

Photodegradation:

- 162-1 In water
- 161-3 In soil

Metabolism Studies - Lab:

- 162-1 Aerobic soil
- 162-2 Anaerobic soil

Mobility Studies:

- 163-1 Leaching and adsorption/desorption

Data requirements which have NOT been fulfilled:

- 166-2 Small-scale Retrospective Ground-water Monitoring

Data Requirements for which a substitution is being made:

- 163-1

In lieu of the Terrestrial field dissipation data requirement (163-1), a ground water monitoring study as defined in the draft Small-scale Retrospective Groundwater Monitoring Guidelines is required. This study must include tests in three geographically and hydrogeologically diverse locations representative of the areas in the United States where Prometon is used. In addition, the ground water monitoring study should sufficiently address depth of leaching which was not satisfactorily addressed in the supplemental terrestrial field dissipation study. Since these guidelines are still in the developing stages, a protocol for the study has been requested. Protocol should be sent to EFGWB, Michael Barrett, Acting Chief, Environmental Fate Ground Water Section, before the initiation of the study.

Data Requirements to be submitted

- 166-2 Small-scale Retrospective ground water Monitoring Study

7. Integrating Paragraph to highlight special issues

One study (41-6091-24 Acute Avian LD<sub>50</sub>) with Bob-white quail completes the guideline requirement for a single dose LD<sub>50</sub>.

A non-observed effect level (NOEL) could not be ascertained due to toxic symptoms seen at all dose levels. The lowest dose tested was 294 mg/a.i. kg. The toxic symptoms seen may impair the ability of birds exposed to prometon to:

- find food
- care for young
- escape predation

8. Ecotoxicity studies to be flagged for early review for tier or other decisions

None at this time.

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9. Any data waivers, special considerations, or special study needs? (special information needed for data waivers)

A waiver for 165-4 bioaccumulation in fish was requested. EFGWB stated on Table A-the Generic Data Requirements for Prometon that the octanol/water coefficient is 4.3 at 20°C. which is well below the trigger factor for requiring the fish accumulation. At this octanol/water coefficient, prometon should not accumulate in fish. In addition, according to the submitted data, aquatic life should not be exposed to Prometon with present uses. Therefore, EFGWB concurs with the request for waiver of the fish accumulation study.

A special ground water monitoring study is required.