MEMORANDUM


FROM: Kenneth W. Dockter, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Ph.D., Chief
Residue Chemistry Branch
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TO: Frederick J. Hageman, PM# 50
Data Call-In Staff/IO
Registration Division (TS-767)

and

Sam Creeger, Section Head
Exposure Assessment Branch
Hazard Evaluation Division (TS-769)

Residue Chemistry Branch concurrently with Exposure Assessment Branch are requested to evaluate the adequacy of the data submitted for prometon, as part of groundwater data call-in.

This submission in its entirety consists of the following:

Vapor Pressure : 3.1 x 10^-6 mbar @ 20°C

Octanol/water partition coefficient: pK = 4.3 @ 20°C

Water solubility : 620 ppm @ 20°C
Conclusion and Recommendation

Although the methods that were used to determine these values are not described, RCB considers the water solubility and vapor pressure data adequate for the purpose of the groundwater data call-in. However, for the octanol/water partition coefficient a telephone call to Richard Conn (1/2/85) revealed uncertainty as to whether the reported value represents an experimental or calculated value. The registrant must provide an experimental $K_{ow}$ along with a description of the method and some raw data (concentration in octanol and water phases). The term "pK" should also be clearly defined (does it mean "log $K_{ow}$"?) A calculated value may also be provided but in itself will not be adequate.

cc: R.F., Circu, Reviewer, Prometon S.P.
RDI: ARR: 1/15/85: RDS 1/15/85
TS-769: RCB: KD: bj: RM-810: CM#2 1/17/85