MEMORANDUM

SUBJECT: Prometon Technical, Shaughnessey number 080804; Aquatic Studies; 72-3, 4(a)(b)

FROM: Douglas Urban, Acting Branch Chief Ecological Effects Branch Environmental Fate and Effects Division

TO: Thomas Luminello, Jr. (H7508W) Chemical Review Manager, Team 52 Special Review and Reregistration Division

EEB has completed a review of the following aquatic studies submitted by Ciba-Geigy Corp. to satisfy Guidelines 72-3, 72-4(a) and 72-4(b).

The following is a summary of the studies:


This study fulfills the requirements for an Acute Toxicity Test for Estuarine and Marine Organisms (Mollusc 96-Hour Flow-Through Shell Deposition Study). The 96-hour EC50 is 27.50 mg a.i. prometon/L as determined using the Probit method with mean measured concentrations. The NOEC was determined using ANOVA and Dunnett's test to be 8.61 mg a.i. prometon/L. Prometon is categorized as slightly toxic to Eastern Oysters (S.E.P.; EPA-540/9-85011).


The study is sound but does not satisfy the guidelines of the Fish Early Life Stage Toxicity Study because all raw data was not submitted. When the raw data for length and weights is submitted statistical analysis may be performed, then the study may be
upgraded to 'core'. The values determined with the information given thus far are as follows:

<table>
<thead>
<tr>
<th></th>
<th>NOEC</th>
<th>LOEC</th>
<th>MATC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Survival</td>
<td>9.49 mg</td>
<td>19.7 mg</td>
<td>13.8 mg</td>
</tr>
<tr>
<td>Hatching Success</td>
<td>9.49 mg</td>
<td>19.7 mg</td>
<td>13.8 mg</td>
</tr>
</tbody>
</table>


This study fulfills the requirements for a Daphnia magna Life-Cycle Chronic Toxicity Test. ANOVA was used to determine the NOEC, LOEC and MATC for each of three parameters: growth, reproduction and survival. The results are as follows:

<table>
<thead>
<tr>
<th></th>
<th>NOEC</th>
<th>LOEC</th>
<th>MATC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Growth</td>
<td>6.77 mg</td>
<td>13.50 mg</td>
<td>9.56 mg</td>
</tr>
<tr>
<td>Reproduction</td>
<td>3.45 mg</td>
<td>6.77 mg</td>
<td>4.84 mg</td>
</tr>
<tr>
<td>Survival</td>
<td>13.5 mg</td>
<td>28.5 mg</td>
<td>19.5 mg</td>
</tr>
</tbody>
</table>

Questions regarding the review of these studies, please contact Dana Lateulere at 557-2109.
DP BARCODE: 165495

CASE: 813912 DATA PACKAGE RECORD
SUBMISSION: 5398046 BEAN SHEET

** CASE/SUBMISSION INFORMATION **

CASE TYPE: Reregistration ACTION: 627 GENERIC DATA SUBMISSION
CHEMICALS: 080804 Prometon

ID#: 080804-000100
COMPANY: 000100 CIBA-GEIGY CORP.
PRODUCT MANAGER: 52 CHRISTINE RICE 703-308-8177 ROOM: CS1 3F3
PM TEAM REVIEWER: THOMAS JR LUMINELLO 703-308-8075 ROOM: CS1 4M1
RECEIVED DATE: 06/24/91 DUE OUT DATE: 10/22/91

** DATA PACKAGE INFORMATION **

DP BARCODE: 165495 EXPEDITE: N DATE SENT: 06/24/91 DATE RET.: / /
CHEMICAL: 080804 Prometon
DP TYPE: 102 Phase V Review
ADMIN DUE DATE: 10/22/91 CSF: N LABEL: N

** DATA REVIEW INSTRUCTIONS **

For the attached reregistration List B case, please identify if data requirements are satisfied by this submitted data:
MRID: 418109-01 GDLN 72-3
418109-02 72-4(a)
418109-03 72-4(b)

** ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION **

DP BC BRANCH/SECTION DATE OUT DUE BACK INS CSF LABEL

DERS
Mollusc - 96 hour (Core)
Early life - Fathead (Supplemented)
Daphnia - Flow through (Core)