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OFFICE OF
PREVENTION, PESTICIDES AND
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Date: March 5, 2008

MEMORANDUM

SUBJECT: Fate Data Evaluation Records (DERs) for Clofentezine

FROM: Keara Moore, Chemist 3/5/08
Environmental Risk Branch 3

THRU: Thomas Bailey, PhD, Acting Branch Chief
Environmental Risk Branch 3
Environmental Fate and Effects Division (7507P)

TO: Joy Schnackenbeck, Chemical Review Manager
Special Review and Reregistration Division (7508P)

The Environmental Fate and Effects Division (EFED) has completed its review of data submitted by Makhteshim-Agan North America on the active ingredient clofentezine. These data were submitted in response to the Problem Formulation for Clofentezine Registration Review (02/02/07).

Attached please find EFED's data evaluation reports (DERs) for environmental fate studies for clofentezine and its degradation product 2-chlorobenzoic acid (2-chlorobenzylidine) hydrazide. Fate studies include column leaching, hydrolysis, and aerobic aquatic metabolism for the parent compound and a batch equilibrium study for the hydrazide degradate. Ecological DERs are included in a separate memo.

These studies fill some data gaps identified in the Problem Formulation for Registration Review (02/02/07). For environmental fate properties, the column leaching and batch equilibrium studies satisfy the requirement for mobility data. The aerobic aquatic metabolism study partially fulfills the data requirement; it was rated supplemental because it had low material balances and did not identify all volatile residues. No new studies have been submitted for the anaerobic aquatic metabolism requirement, so that data gap remains only partially fulfilled. Additional aerobic and anaerobic aquatic metabolism data would reduce uncertainty in characterizing the fate of clofentezine in

aquatic systems, but would be unlikely to significantly change risk conclusions. Data have been submitted for solubility of clofentezine and are under review; unless these data are rated acceptable, solubility remains a data gap with high value.

MRID	GLN Number	Test material	Acceptability of Data	Guideline fulfilled?
47192104	163-1	2-chlorobenzoic acid (2-chlorobenzylidine) hydrazide	Supplemental	Yes
47192107	161-1	Clofentezine	Acceptable	Yes
47192114	163-1	Clofentezine	Acceptable	Yes
47192116	162-4	Clofentezine	Supplemental	Partially