

Joint Exhibit 53

From: Porter, Julie
Sent: Thursday, March 6, 2014 7:39 PM
To: Bloom, Jill (Bloom.Jill@epa.gov)
Cc: Porter, Julie
Subject: FW: GDCI-078701-1140-DCPA-AMVAC Chemical Corporation

Hi Jill,

I received the below response from our toxicologist and the HLS protocol will be fine for the passerine acute study. As a result, AMVAC will begin the study and would like to request a time extension until 10/30/2014.

Please let me know if you would like a formal request.

Thank you!
Julie

From: Jonynas, Ann
Sent: Thursday, March 06, 2014 9:41 AM
To: Porter, Julie
Cc: Wood, Jon
Subject: RE: GDCI-078701-1140-DCPA-AMVAC Chemical Corporation

Hi Julie

In response to EPA's request, we will now rely on the protocol for the passerine acute study, developed by Huntingdon labs. Especially since EFED have already done the work on this protocol and other registrants are using it.

I have the proposed study dates given by HLS for our study:

Range finding:
Will be undertaken during April 2014

Main Study

Birds assigned to study: w/b 05 May 2014
Treatment: w/b 20 May 2014
Termination: w/b 03 June 2014
Draft report: 01 August 2014
Final Report: 30 September 2014

You will need to ask EPA for a time extension to 30 October 2014 for the submission of our final report into EPA.

Regards
Ann

Ann Jonynas MSc DipRCPATH(Tox)
Director of Toxicology
AMVAC Chemical Corporation
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Commerce
CA 90040

Tel: 323-890-1263

Fax: 323-727-1185

E-Mail: annj@amvac-chemical.com

From: Porter, Julie
Sent: Wednesday, February 19, 2014 8:57 AM
To: Jonynas, Ann
Cc: Wood, Jon; Porter, Julie
Subject: FW: GDCI-078701-1140-DCPA-AMVAC Chemical Corporation

Hi Ann,
Please see EPA's note below and let me know how you would like to respond.

Thanks,
Julie

From: Bloom, Jill [<mailto:Bloom.Jill@epa.gov>]
Sent: Wednesday, February 19, 2014 8:53 AM
To: Porter, Julie
Subject: RE: GDCI-078701-1140-DCPA-AMVAC Chemical Corporation

Hi, Julie!

EFED has recently reviewed and accepted with comment a protocol for the passerine acute study, developed by Huntingdon labs. Since they've already done the work on this and other registrants are using it, they would like to know if you want to rely on it too, rather than the protocol Amvac had submitted. I have attached it for your info. Please let me know what you would like us to do. Thanks,

Jill

Jill Bloom, Review Manager
Risk Management and Implementation Branch 2
Pesticide Re-evaluation Division (7508P)
Office of Pesticide Programs
US Environmental Protection Agency
telephone: (703) 308-8019
fax: (703) 308-8005
bloom.jill@epa.gov

From: Porter, Julie [<mailto:JulieP@amvac-chemical.com>]
Sent: Friday, January 31, 2014 5:11 PM
To: Bloom, Jill
Cc: Porter, Julie
Subject: RE: GDCI-078701-1140-DCPA-AMVAC Chemical Corporation

Hi Jill,
The 12-month response to the subject DCI was submitted in 4 boxes and arrived at EPA yesterday. For your reference attached is the cover letter and status sheet included in the submission. Please let me know if you have any questions.

Hope you have a great weekend!

Regards,
Julie

From: Porter, Julie
Sent: Thursday, October 31, 2013 6:17 AM
To: Bloom, Jill
Subject: Re: GDCI-078701-1140-DCPA-AMVAC Chemical Corporation

Thanks Jill! No problem. I have not experienced this situation before, so I was concerned about the timeline. Thank you for checking!

Hope you have a Happy Halloween!

On Oct 31, 2013, at 5:28 AM, "Bloom, Jill" <Bloom.Jill@epa.gov> wrote:

I haven't gotten a response from the scientists yet, but I will pursue this with them.

Jill

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From: Porter, Julie [<mailto:JulieP@amvac-chemical.com>]
Sent: Wednesday, October 30, 2013 11:00 AM
To: Bloom, Jill
Cc: Porter, Julie
Subject: RE: GDCI-078701-1140-DCPA-AMVAC Chemical Corporation

Good morning Jill,

Hope all is well!

Just wanted to send a note regarding the Avian Acute Inhalation (Guideline No. SS-1075) requested in the GDCI (Order Number: GDCI-078701-1140) issued 1/31/2013. AMVAC submitted a waiver request for EPA review on 4/29/2013 and has not yet received a response regarding this guideline. The 9 month study due date is this week, so please let me know if an answer is coming soon or if we could possibly extend the due date.

Thank you,
Julie

From: Bloom, Jill [<mailto:Bloom.Jill@epa.gov>]
Sent: Monday, September 23, 2013 9:54 AM
To: Porter, Julie
Subject: RE: GDCI-078701-1140-DCPA-AMVAC Chemical Corporation

Julie,

I have asked for answers on these questions to be provided to me within the next month or so. So far, so good, but I don't think I will get an estimated timeframe from my scientists. I do think, though, that we may have remarks on the comparative thyroid study protocol sooner rather than later.

Jill

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From: Porter, Julie [<mailto:JulieP@amvac-chemical.com>]
Sent: Monday, September 23, 2013 12:32 PM
To: Bloom, Jill
Cc: Porter, Julie
Subject: RE: GDCI-078701-1140-DCPA-AMVAC Chemical Corporation

Thank you Jill!

If possible, please let me know if you would be able to provide an estimated timeframe on EPA's response for the remaining guideline waivers submitted in Amvac's 90 day response (dated 4/29/2013)?

Thank you for your help!

Regards,
Julie

From: Bloom, Jill [<mailto:Bloom.Jill@epa.gov>]
Sent: Monday, September 23, 2013 9:05 AM
To: Porter, Julie
Subject: RE: GDCI-078701-1140-DCPA-AMVAC Chemical Corporation

Julie,

Good news. The immunotoxicity testing requirement for DCPA is waived. As for the inhalation study, 28 days in life is acceptable (as opposed to 90 days).

Jill

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From: Porter, Julie [<mailto:JulieP@amvac-chemical.com>]
Sent: Wednesday, September 11, 2013 9:27 AM
To: Bloom, Jill
Cc: Porter, Julie
Subject: RE: GDCI-078701-1140-DCPA-AMVAC Chemical Corporation

Thank you Jill – that would be perfect!

From: Bloom, Jill [<mailto:Bloom.Jill@epa.gov>]
Sent: Wednesday, September 11, 2013 4:56 AM
To: Porter, Julie
Subject: RE: GDCI-078701-1140-DCPA-AMVAC Chemical Corporation

Julie,

I don't have a response yet, but I have feedback on some of Amvac's 90d submissions, etc. I will see if there is anything I can tell you this afternoon—I am out all morning.

Jill

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From: Porter, Julie [<mailto:JulieP@amvac-chemical.com>]
Sent: Tuesday, September 10, 2013 7:40 PM
To: Bloom, Jill
Cc: Porter, Julie
Subject: FW: GDCI-078701-1140-DCPA-AMVAC Chemical Corporation

Hi Jill,

Just wanted to check in on the status of the EPA response to the attached DCPA submission. We are working on our 2014 budgets and it would be helpful to plug in some timelines for the studies if possible - no rush....Thank you!

Best regards,
Julie

From: Porter, Julie
Sent: Wednesday, May 01, 2013 9:28 AM
To: Bloom.Jill@epamail.epa.gov
Cc: Baker-Smith, Cindy; Wood, Jon; Hathaway, Margaret (Hathaway.Margaret@epa.gov); Porter, Julie
Subject: RE: GDCI-078701-1140-DCPA-AMVAC Chemical Corporation

Hi Jill,
Hope you are having a nice week. I just wanted to send a note to let you know the required 90 day response for the subject GDCI arrived at your office mail room this morning. The cover letter is attached for your reference. Please let me know if you have any questions.

Kind regards,
Julie

From: Porter, Julie
Sent: Thursday, January 31, 2013 2:05 PM
To: OPP_PRD_PSB_DCI-Receipt_Team@epamail.epa.gov

Cc: Bloom.Jill@epamail.epa.gov; Baker-Smith, Cindy; Wood, Jon; Porter, Julie
Subject: FW: GDCI-078701-1140-DCPA-AMVAC Chemical Corporation

Dear OPP_PRD_PSB_DCI-Receipt Team:

I, [Julie Porter - Regulatory Product Manager](#), have received from U.S. EPA's Office of Pesticide Programs the pesticide DCI (GDCI for DCPA– 078701-1140) on 1/31/13 for [Amvac Chemical Corporation](#). Additionally, I have successfully opened the file attachment(s) that accompanied the transmittal email.

Thank you for this information.

Best regards,

Julie

Julie Porter
Regulatory Product Manager
AMVAC Chemical Corporation
Direct: (949) 221-6104 | Fax: (949)476-9303
Email: juliep@amvac-chemical.com

From: Scott.Meredith@epamail.epa.gov [<mailto:Scott.Meredith@epamail.epa.gov>] **On Behalf Of**
OPP_PRD_PSB_DCI-Receipt_Team@epa.gov
Sent: Thursday, January 31, 2013 3:56 AM
To: Porter, Julie
Cc: Bloom.Jill@epamail.epa.gov
Subject: GDCI-078701-1140-DCPA-AMVAC Chemical Corporation

Dear Ms. Porter:

Please open immediately the attached file below and then read and review it. This email and attached file constitute the electronic transmission of a Data Call-In (DCI) Notice to you. The DCI Notice requires you, a registrant of pesticide products containing the active ingredient DCPA, to take certain steps and to submit certain report and data to the U.S. Environmental Protection Agency (EPA)'s Office of Pesticide Programs, Pesticide Re-evaluation Division within the time frames provided in the DCI.

As part of your compliance with the DCI requirements, you are required to respond to this e-mail transmission by "forwarding with attachments" your response by e-mail to EPA as follows:

"I, [*insert your name and title*], have received from U.S. EPA's Office of Pesticide Programs the pesticide DCI (GDCI for DCPA– 078701-1140) on [*insert date*] for [*insert registrant name as shown on the attached DCI Forms*]. Additionally, I have successfully opened the file attachment(s) that accompanied the transmittal email."

If you are an agent for the registrant, add this additional information to your above acknowledgement:

"I am the agent for [*insert registrant name as shown on the attached DCI Forms*]."

Send your acknowledgement e-mail **with the original attachment(s)** to OPP_PRD_PSB_DCI-Receipt_Team@epamail.epa.gov.

You are required to send a complete and adequate e-mail response to the Agency within five business days measured from your company's receipt of the original email and DCI transmission by EPA. If you have any electronic transmission difficulties please contact one of the names at the bottom of this page.

The attached file below contains the DCI Notice and its cover letter, attachments, and instructions concerning DCPA. As per the cover letter and instructions provided, see the DCI with its attachments. Within 90 days after your company receives this DCI Notice, you must respond to the DCI and its data requirements as further required by the DCI. Specific deadlines for submission of reports and data are set forth in the DCI and its attachments.

A copy of the DCI will be placed in the Registration Review docket for DCPA at www.regulations.gov. If you have any questions about the DCI, please contact the Chemical Review Manager, identified in Attachment 1: Data Call-In Chemical Status Sheet, by e-mail or letter.

(See attached file: GDCI-078701-1140-DCPA.AMVAC.PDF)

Sincerely,

The DCI Mail out Team, Pesticide Re-evaluation Division,

Office of Pesticide Programs,

U.S. Environmental Protection Agency

Joseph J. Nevola 703-308-8037 Gary M. Mullins 703-308-8044 Meredith R. Scott 703-308-0049