



**OPP Response 14:** Respondent does not believe AMVAC is responsible for the time elapsed between the date the study was submitted and the date of the earliest signature of any primary or secondary reviewer on a DER. Respondent objects to the relevance of AMVAC’s involvement with or responsibility for the OPP-internal period between receipt of a study and signature by an OPP reviewer.

**INT 15:** For any DER concerning a study submitted by AMVAC to fulfil a data requirement at issue in this matter for which OPP indicated that there was “inadequate data received” in the NOITS (at 87 Fed. Reg. 25,262) indicate whether EPA believes that AMVAC is responsible for any portion of the delay between the date of the earliest signature of any primary or secondary reviewer and the date of the latest signature of any primary or secondary reviewer on such DER.

**OPP Response 15:** Respondent does not believe AMVAC is responsible for the time elapsed between the date of the earliest signature of any primary or secondary reviewer and the date of the latest signature of any primary or secondary reviewer on a DER. Respondent objects to the relevance of AMVAC’s involvement with or responsibility for the OPP-internal period between any initial and final signature by OPP reviewers.

**INT 16:** For any DER concerning a study submitted by AMVAC to fulfil a data requirement at issue in this matter for which OPP indicated that there was “inadequate data received” in the NOITS (at 87 Fed. Reg. 25,262) indicate whether EPA believes that AMVAC is responsible for any portion of the delay between the date of the latest signature of any primary or secondary reviewer and the date the DER was transmitted to AMVAC.

**OPP Response 16:** Respondent does not believe AMVAC is responsible for the time elapsed between the date of the latest signature of any primary or secondary reviewer and the date the DER was transmitted to AMVAC. Respondent objects to the relevance of AMVAC's involvement with or responsibility for the OPP-internal period between signature by an OPP reviewer and transmission of a document to AMVAC.

**INT 17:** To the extent EPA asserts AVMAC was responsible for any delay identified in the previous three interrogatories, state the basis for that contention.

**OPP Response 17:** Respondent does not believe AMVAC is responsible for the time elapsed between the dates described in INTs 14, 15, and 16. Respondent objects to the relevance of AMVAC's involvement with or responsibility for any OPP-internal time period or action.

Respectfully submitted,

Dated: December 6, 2022

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***In re FIFRA Section 3(c)(2)(B) Notice of Intent to Suspend Dimethyl  
Tetrachloroterephthalate (DCPA) Technical Registration***

AMVAC Chemical Corporation; Grower-Shipper Association of Central California; Sunheaven Farms, LLC; J&D Produce; Ratto Bros., Inc.; and Huntington Farms, Petitioners.  
Docket No. FIFRA-HQ-2022-0002

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **Respondent's Additional Discovery Clarifications**, dated December 6, 2022, was sent this day to the following parties in the manner indicated below.

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Dated December 6, 2022