

**VERIFIED WRITTEN STATEMENT OF AMVAC
FACT WITNESS SUNEET RANGANATH**

BUSINESS CONFIDENTIAL INFORMATION REDACTED

Information claimed confidential has been redacted and a complete copy of the document containing the information claimed confidential has been filed with the Office of Administrative Law Judges.

I, Suneet Ranganath, declare and state as follows:

1. The following statements are true and correct to the best of my knowledge and belief and are based on my personal knowledge.

Background and Curriculum Vitae

2. I received a Bachelor of Science in Chemical Engineering degree from the University of Cincinnati in 1988. I received a Master's in Business Administration degree from the University of Delaware in 1999. I received a Juris Doctor degree from the Delaware Law School (formerly Widener Law School) in 2007.

3. Prior to joining AMVAC, I worked at E.I. DuPont de Nemours for 28 years starting in 1988 in a number of roles spanning Manufacturing/Manufacturing management, Marketing, and Strategic Sourcing. I also was Director of Operations & Sales Strategy for an internet startup company ChemConnect between 2000 and 2003.

4. I joined AMVAC Chemical in May 2019 as Vice President of Global Supply Chain. In August 2019, my role expanded to include Operations. My title is Vice President of Global Supply Chain and Operations for the AMVAC Chemical Corporation.

5. Specifically, I manage the Supply Chain and Operations for DCPA which includes planning, sourcing, logistics, formulation, and packaging for all of AMVAC's products, including DCPA.

AMVAC DCPA Supply Chain and Manufacture

6. AMVAC formulates Dacthal end use products (EUPs) at pesticide production registered establishments in Marsing, ID, and Columbus, Ohio. The DCPA EUP Dacthal Flowable is formulated at the Marsing, Idaho registered establishment. The DCPA EUP Dacthal 75-W wettable powder is formulated at the Columbus, Ohio registered establishment. Neither of these

establishments manufacture DCPA Technical.

7. Dacthal Flowable and Dacthal 75-W wettable powder are formulated at the establishments identified above in a non-integrated process. DCPA Technical is delivered to the registered production facilities where it is then formulated into the respective EUP.

8. As of June 17, 2022, the amount of DCPA end-use products that AMVAC currently has in inventory in the United States for sale and distribution is **Commercially Sensitive Information**

██████████

9. Dacthal Flowable and Dacthal 75-W are sold, distributed, and used year-round in the United States.

10. Based on historical sales activity, I estimate that the **Commercially Sensitive Information** **Commercially Sensitive Information** currently available for sale and distribution in the United States will be insufficient to meet all of the growers' need for the product for the remainder of 2022 (less than half of the growers would be able to obtain the amount of Dacthal EUP that they would need). The number of growers that could be adversely impacted by product shortages could be even higher if growers attempt to stockpile product currently available for purchase.

11. Given the uncertainty as to when any possible suspension order may take effect, it is not possible to say with certainty what the exact impact of a suspension of AMVAC's formulation of Dacthal EUP products would be for the rest of 2022.

12. I will be prepared to testify during the hearing in this matter concerning the availability of Dacthal EUPs based on the facts at the time of the hearing.

13. Any expected shortage resulting from the possible suspension noted above could be alleviated if AMVAC were permitted to formulate Dacthal Flowable and Dacthal 75-W EUPs from any available inventory of existing stocks of DCPA technical at the time a potential suspension goes into effect.

I, Suneet Ranganath, declare under penalty of perjury under the laws of the United States that the statements contained in the written statement above are true and correct to the best of my knowledge. Executed this 17th day of June 2022.

/s/ Suneet Ranganath
Suneet Ranganath

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Verified Written Statement of AMVAC Fact Witness Suneet Ranganath**, was served on the following parties today, June 17, 2022, as indicated below.

/s/ Hume M. Ross

Hume M. Ross

Copy by OALJ E-Filing System to:

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