

RESPONDENT'S EXHIBIT 11

From: [Douglass, James](#)
To: [Wood, Jon](#)
Cc: [Bloom, Jill](#); [Britton, Cathryn](#)
Subject: RE: GDCI-078701-1140 (DCPA)
Date: 7 August, 2020 10:36:00
Attachments: [image001.png](#)

Thank you for these updates, Jon. I will read through these and compare with my notes.

Sincerely,

James Douglass

Chemical Review Manager, RMIB 5/PRD/OPP/OCSPP/U.S. EPA

703-347-8630

douglass.james@epa.gov

From: Wood, Jon <JonW@amvac.com>

Sent: Thursday, August 6, 2020 7:52 PM

To: Douglass, James <douglass.james@epa.gov>

Cc: Bloom, Jill <Bloom.Jill@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>

Subject: RE: GDCI-078701-1140 (DCPA)

Hi James,

Please see attached for status of DCPA DCI requirements. I held this back a couple of days to include the most recent update on the CTA (submitted earlier today under separate cover) so the attached status sheet is current from our standpoint and includes what we consider next actions (last column).

There is a great deal of information in this summary as it tracks our records of submissions and EPA reviews for each Guideline. I would like to expand upon a couple of items—

1. We have two completed studies that will be submitted to EPA shortly —
 - a. GL 850.4100 - Seedling Emergence conducted on degradate TPA (AMVAC Ref. No. 100-NON-022).
 - b. GL 850.1300 - Daphnid Chronic Toxicity conducted on degradate TPA (AMVAC Ref. No. 100-AQU-045).
2. Several GLs are supported with proposed changes to labeling (i.e., 860.1300, 860.1340, 860.1480, 860.1900, ss-1075).
 - a. Labels have been submitted to RD (Mindy Ondish) for both Technical product (Reg. No. 5481-495) and end-use products (Reg. Nos. 5481-487, 5481-490, 5481-491). We have responded to a few comments from reviewers but no amendment approvals yet as RD is experiencing significant back log of non-PRIA actions. I can provide you with our latest *proposed* labeling for each product upon request.
3. Comparative Thyroid Assay (GL ss-thyroid tox) - This is the only study that is in-progress. A quarterly update and scheduling for the dose Range Finding study was submitted to you under separate cover earlier today. There have been several quarterly update submissions and protocol discussions for this complex study - the details of which I chose not to include in this status sheet (i.e., Submission Information) but can provide to you upon request.
4. Many GL requirements are supported by waiver proposals that have not been addressed to date. Our most recent waiver proposals were submitted to EPA in

February 2018.

Please confirm that the status as we have described in the summary is current and that we have not missed a review or decision from the Agency. As always, we welcome the opportunity to meet (virtually) with the Agency to discuss any of these DCI requirements, so please contact me if you feel that would be of value.

Thanks again for your patience!

Best regards,

Jon

Jon C. Wood
Sr. Regulatory Manager
AMVAC Chemical Corporation
4695 MacArthur Court
Suite 1200
Newport Beach, CA 92660
Office: (949) 221-6109
Mobile: (714) 651-7541



From: Douglass, James <douglass.james@epa.gov>

Sent: Monday, July 20, 2020 12:04 PM

To: Wood, Jon <JonW@amvac.com>

Cc: Bloom, Jill <Bloom.Jill@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>

Subject: RE: GDCI-078701-1140 (DCPA)

Thank you, Jon. We look forward to hearing from you.

James Douglass

Chemical Review Manager, RMIB 5/PRD/OPP/OCSPP/U.S. EPA

703-347-8630

douglass.james@epa.gov

From: Wood, Jon <JonW@amvac.com>

Sent: Monday, July 20, 2020 2:58 PM

To: Douglass, James <douglass.james@epa.gov>

Cc: Bloom, Jill <Bloom.Jill@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>

Subject: RE: GDCI-078701-1140 (DCPA)

Hi James,

I intended to get this to you last week but got sidetracked with other projects. I apologize and will send over my summary this week. Thank you for your patience!

Best regards,

Jon

Jon C. Wood
Sr. Regulatory Manager
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From: Douglass, James <douglass.james@epa.gov>

Sent: Thursday, July 9, 2020 10:54 AM

To: Wood, Jon <JonW@amvac.com>

Cc: Bloom, Jill <Bloom.Jill@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>

Subject: RE: GDCI-078701-1140 (DCPA)

Thank you for the reply, Jon. Enjoy your vacation. We look forward to your status update next week.

Sincerely,

James Douglass

Chemical Review Manager, RMIB 5/PRD/OPP/OCSPP/U.S. EPA

703-347-8630

douglass.james@epa.gov

From: Wood, Jon <JonW@amvac.com>

Sent: Thursday, July 9, 2020 1:36 PM

To: Douglass, James <douglass.james@epa.gov>

Cc: Bloom, Jill <Bloom.Jill@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>

Subject: RE: GDCI-078701-1140 (DCPA)

Hi James and welcome to Dacthal,

I will confirm status of all DCI requirements for you via email next week. I hope that timing works for you as I'm currently on vacation and this would be challenging to delegate to others.

Best regards,

Jon

Jon C. Wood

Sr. Regulatory Manager

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Mobile: (714) 651-7541



From: Douglass, James <douglass.james@epa.gov>

Sent: Tuesday, July 7, 2020 5:54 AM

To: Wood, Jon <JonW@amvac.com>

Cc: Bloom, Jill <Bloom.Jill@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>

Subject: GDCI-078701-1140 (DCPA)

Hello Jon,

I am currently in the process of updating our records concerning GDCI-078701-1140. It would be helpful if you could provide me with a status update for the data required in the GDCI. This update will help reconcile any discrepancies between our records. I appreciate your help. Please let me know if you have any questions regarding this request.

Thank you,

James Douglass

Chemical Review Manager

703-347-8630

douglass.james@epa.gov

Risk Management and Implementation Branch 5

Pesticide Re-evaluation Division
Office of Pesticide Programs
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency