

Joint Exhibit 62



March 15, 2016

Marquea D. King, Ph.D.
Toxicologist
U.S. Environmental Protection Agency
Document Processing Desk (DCI/PRD)
Pesticide Re-evaluation Division
Office of Pesticide Programs (7508P)
2777 South Crystal Drive,
Arlington, VA 22202

Re: DCPA GDCI Data Call In (Order Number: GDCI-0798701-1140)
Chemical # PC Code: 078701 CAS #: 1861-32-1
Chronic Sediment response for Guideline No: ss-1066, ss-1069, ss-1072

Dear Dr. King:

This submission includes AMVAC's response to the three chronic sediment data requirements requested in the Generic Data Call-In (GDCI) Notice dated 1/31/2013. For your reference a detailed history of these guidelines are provided in the updated document named, "12 Month Status of DCPA Registration Review".

In support of this submission, the following documents are enclosed:

1. Application for Registration (EPA Form 8570-1) dated 3/15/2016
2. Three copies of the data in the following table
3. 12 Month Status of DCPA Registration Review dated 3/15/2016

Guideline No.	Amvac Study No.	Study Title	Study No.	MRID
ss-1066	100-AQU-030	Dacthal Technical – 42-day Toxicity Test Exposing Freshwater Amphipods (<i>Hyalella Azteca</i>) to a Test Substance Applied to Sediment Under Static-Renewal Conditions Following EPA Test Methods	11857.6111	
ss-1069	100-AQU-029	Dacthal Technical – Life-Cycle Toxicity Test Exposing Midges (<i>Chironomus dilutes</i>) to a Test Substance Applied to Sediment Under Static-Renewal Conditions Following EPA Test Methods	11857.6110	
ss-1072	100-AQU-028	Proposed Waiver for Dacthal (DCPA) Chronic Study Testing on <i>Leptocheirus plumulosus</i>	100-AQU-028	

It is my understanding this submission addresses the requirements due at this time. Please feel free to contact me at 949-221-6104 or email juliep@amvac-chemical.com if you have any questions or need further information.

Best regards,

Julie Porter
Project Manager

20160315jcp.dcpa.us



United States
 Environmental Protection Agency
 Washington, DC 20460

- Registration
- Amendment
- Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 5481-495	2. EPA Product Manager Marquee D. King, Ph.D.	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Technical Chlorthal Dimethyl	PM#	
5. Name and Address of Applicant (Include Zip Code) AMVAC Chemical Corporation 4695 MacArthur Ct. Newport Beach, CA 92660 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3I(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

- Amendment - Explain below
- Final printed labels in response to Agency letter dated _____
- Resubmission in response to Agency letter dated _____
- "Me Too" Application
- Notification - Explain below
- Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

DCPA GDCI Data Call In (Order Number: GDCI-0798701-1140); Chemical # PC Code: 078701 CAS #: 1861-32-1
 Chronic Sediment response for Guideline No: ss-1066, ss-1069, ss-1072

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued		<input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Julie Porter	Title Project Manager	Telephone No. (Include Area Code) 949-221-6104
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. Date Application Received (Stamped)
2. Signature 	3. Title Project Manager	8. Date Application Received (Stamped)
4. Typed Name Julie Porter	5. Date March 15, 2016	

Status of DCPA Registration Review DCI

EPA Science Reviews:

7/30/2014: Received review dated 7/7/2014 - "DCPA: HED Response to (12 Month) Comments on the Residue Chemistry Requirements of the Generic Data Call-In (GDCI-0798701-1140)"

7/31/2014: Received review dated 10/23/2013 - "DCPA: HED Response to Comments on the Residue Chemistry Requirements of the Generic Data Call-In (GDCI-0798701-1140)"

10/20/2014: Received review dated 3/20/2014 - "DCPA (Chlorthal-dimethyl): Review of Study Protocols for Determining Chronic Toxicity to Sediment-Dwelling Estuarine/Marine and Freshwater Organisms"

10/21/2014: Received review dated 11/19/2013 - "DCPA: HED Review of the Comparative Thyroid Toxicity Study Protocols"

Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
Environmental Fate Data Requirements						
835.1230	Adsorption/desorption	TPA	12 months	4	4/29/2013 - Promised to submit existing data. 1/29/2014 - Submitted data (MRID 49307517).	Waiting for response from EPA
835.1230	Adsorption/desorption	TPA	12 months	5	4/29/2013 - Request to upgrade cited study MRID 41648805 with existing data. 1/29/2014 - Submitted justification.	Waiting for response from EPA
835.1240	Leaching	TPA	12 months	6	4/29/2013 - Cited existing study MRID 44082601.	Waiting for response from EPA
835.2120	Hydrolysis	TPA	12 months	6	4/29/2013 - Cited existing study MRID 114648.	Waiting for response from EPA

Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
835.4100	Aerobic soil metabolism	TPA	24 months	4	4/29/2013 - Promised to submit existing data. (NOTE - Incorrectly noted on DCI response as: 1, 4. Should be 4 as stated within 4/29/2013 submission.) 1/29/2014 - Submitted data (MRID 49307516)	Waiting for response from EPA
835.4200	Anaerobic soil metabolism	TPA	24 months	6	4/29/2013 - Cited existing study MRID 114651.	Waiting for response from EPA
835.4300	Aerobic Aquatic metabolism	DCPA	24 months	4	4/29/2013 - Promised to submit existing data. 1/29/2014 - Submitted data (MRID 49307515).	Waiting for response from EPA
835.4300	Aerobic aquatic metabolism	TPA	24 months	9	4/29/2013 - Submitted Waiver - Defer once review completed on Parent study	Waiting for response from EPA
835.4400	Anaerobic aquatic metabolism	TPA	24 months	9	4/29/2013 - Submitted Waiver - Cited EFED document	Waiting for response from EPA
835.6100	Terrestrial field dissipation	DCPA	24 months	6	4/29/2013 - Cited existing study MRID 44082601	Waiting for response from EPA
835.6100	Terrestrial field dissipation	TPA	24 months	6	4/29/2013 - Citing Existing data MRID 44082601	Waiting for response from EPA

Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
Nontarget Plant Protection Data Requirements						
850.4100	Tier I Plant tox - Seedling Emergence	DCPA	12 months	1	4/29/2013 - Developing data. 1/29/2014 - Submitted data (MRID 49307513).	Waiting for response from EPA
850.4100	Tier I Plant tox - Seedling Emergence	TPA	12 months	9	4/29/2013 - submitted Waiver - Defer once review completed on Parent study.	Waiting for response from EPA
850.4150	Tier I Plant tox - Vegetative Vigor	DCPA	12 months	1	4/29/2013 - Developing data. 1/29/2014 - Submitted data (MRID 49307506).	Waiting for response from EPA
850.4150	Tier I Plant tox - Vegetative Vigor	TPA	12 months	NA	4/29/2013 - Noted on submission that this is not required.	NA
850.4400	Tier I/II Plant tox (Lemna spp.)	DCPA	12 months	1	4/29/2013 - Developing data. 1/29/2014 - Submitted data (MRID 49307509).	Waiting for response from EPA
850.4400	Aquatic vascular plant growth - Lemna spp. Tiers II	TPA	12 months	9	4/29/2013 - submitted Waiver - Defer once review completed on Parent study.	Waiting for response from EPA
850.4500	Algal tox test, Tier I/II	DCPA	12 months	1	4/29/2013 - Developing data. 1/29/2014 - Three studies included in January submission (MRID 49307508), (MRID 49307504), and (MRID 49307507). MRID 41054829 received approval in DER dated 10/17/1990 for fourth required species.	Waiting for response from EPA
850.4500	Algal tox test, Tier I/II	TPA	12 months	9	4/29/2013 - submitted Waiver - Defer once review completed on Parent study.	Waiting for response from EPA

Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
Residue Chemistry Data Requirements for Food Uses						
860.1300	Nature of the residue: poultry	DCPA	24 months	7	4/29/2013 - Waiver submitted to delete alfalfa. 7/31/2014 - Received EPA HED review dated 10/23/2013 stating waiver possibly accepted, but need additional data regarding 860.1900 for confirmation. 9/24/2014 - AMVAC submitted justification submission for 860.1900	Waiting for response from EPA
860.1340	Residue analytical method: livestock commodities	DCPA	24 months	7	4/29/2013 - Waiver submitted to delete ruminant commodities. 7/31/2014 - Received EPA HED review dated 10/23/2013 stating waiver possibly accepted, but need additional data regarding 860.1900 for confirmation. 9/24/2014 - AMVAC submitted justification submission for 860.1900	Waiting for response from EPA
860.1380	Storage stability	DCPA	24 months	5	4/29/2013 - Request to upgrade study - Citing several studies. 1/29/2014 - Provided justification. 7/7/2014 - EPA HED review: Requirement satisfied. 7/31/2014 - Received EPA HED review dated 10/23/2013 acknowledging AMVAC's intention to submit additional data.	Guideline Satisfied

Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
860.1480	Meat/milk/ poultry/eggs: ruminants	DCPA	24 months	7	4/29/2013 - Waiver submitted to delete alfalfa, white potatoes, and peas. 7/31/2014 - Received EPA HED review dated 10/23/2013 stating waiver possibly accepted, but need additional data regarding 860.1900 for confirmation. 9/24/2014 - AMVAC submitted justification submission for 860.1900	Waiting for response from EPA
Terrestrial and Aquatic Nontarget Organisms Data Requirements						
850.1010	Acute tox, freshwater invertebrates	DCPA	12 months	4	4/29/2013 - Promised to submit existing data. 1/29/2014 - Submitted data (MRID 49307514).	Waiting for response from EPA
850.1010	Acute tox, freshwater invertebrates	TPA	12 months	4	4/29/2013 - Promised to submit existing data. 1/29/2014 - Submitted data (MRID 49307514).	Waiting for response from EPA
850.1025	Acute tox, oyster (shell deposition)	DCPA	12 months	1	4/29/2013 - Developing data. 1/29/2014 - AMVAC unintentionally omitted in submission (100-AQU-024). 10/29/2014 - Submitted Data (MRID 49500701).	Waiting for response from EPA
850.1025	Acute tox, oyster (shell deposition)	TPA	12 months	9	4/29/2013 - submitted Waiver - Defer once review completed on Parent study.	Waiting for response from EPA
850.1035	Acute tox, mysid	DCPA	12 months	1	4/29/2013 - Developing data. 1/29/2014 - Submitted data (MRID 49307505).	Waiting for response from EPA

Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
850.1035	Acute tox, mysid	TPA	12 months	9	4/29/2013 - submitted Waiver - Defer once review completed on Parent study.	Waiting for response from EPA
850.1075	Acute tox, estuarine/marine fish	DCPA	18 months	1	4/29/2013 - (Marine) Developing data for marine. 1/29/2014 - Submitted data (MRID 49307511).	Waiting for response from EPA
850.1075	Acute tox, freshwater fish	DCPA	18 months	5	4/29/2013 - Request to upgrade MRID 41054827. 1/29/2014 - Submitted justification.	Waiting for response from EPA
850.1075	Acute tox, freshwater fish	DCPA	18 months	5	4/29/2013 - Request to upgrade MRID 41054826. 1/29/2014 - Submitted justification.	Waiting for response from EPA
850.1075	Acute tox, freshwater fish	TPA	12 months	4	4/29/2013 - (Freshwater) Promised to submit existing data. 1/29/2014 - Submitted data (MRID 49307518).	Waiting for response from EPA
850.1075	Acute tox, freshwater fish	TPA	12 months	9	4/29/2013 - (Freshwater) submitted Waiver - Defer once review completed on Parent study. (NOTE - Did not segregate two freshwater responses on DCI response document. This should be a "9" as stated within 4/29/2013 submission.)	Waiting for response from EPA
850.1075	Acute tox, estuarine/marine fish	TPA	12 months	9	4/29/2013 - (Marine) submitted Waiver - Defer once review completed on Parent study.	Waiting for response from EPA
850.1300	Aquatic invertebrate life-cycle, freshwater	DCPA	12 months	1	4/29/2013 - Developing data. 1/29/2014 - Submitted data (MRID 49307510).	Waiting for response from EPA

Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
850.1300	Aquatic invertebrate life-cycle, freshwater	TPA	12 months	9	4/29/2013 - submitted Waiver - Defer once review completed on Parent study.	Waiting for response from EPA
850.1350	Aquatic invertebrate life-cycle, estuarine/marine	DCPA	12 months	1	4/29/2013 - Developing data. 1/29/2014 - Submitted data (MRID 49307512).	Waiting for response from EPA
850.1350	Aquatic invertebrate life-cycle, estuarine/marine	TPA	12 months	9	4/29/2013 - submitted Waiver - Defer once review completed on Parent study.	Waiting for response from EPA
850.1400	Fish early life-stage	DCPA	12 months	4	4/29/2013 - Promised to submit existing data. 1/29/2014 - Submitted data (MRID 49307520).	Waiting for response from EPA
850.1400	Fish early life-stage	TPA	12 months	9	4/29/2013 - submitted Waiver - Defer once review completed on Parent study.	Waiting for response from EPA

Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
850.2100	Acute avian oral, passerine species	DCPA	12 months	1	3/27/2013 - Protocol requested by Margaret Hathaway via phone conversation. 4/29/2013 - Developing Data, Submitted Protocol. 2/29/2014 - EPA asked if AMVAC would agree to use the HLS passerine acute approved protocol. 3/6/2014 - AMVAC agreed to use the Passerine acute protocol and requested extension request until 10/30/2014. 9/30/2014 - Submitted data (MRID 49477601)	Waiting for response from EPA
850.2300	Avian reproduction	DCPA	24 months	6	4/29/2013 - Cited Existing Study - MRID 47550001 and MRID 47550002.	Waiting for response from EPA
Terrestrial and Aquatic Nontarget Organisms Data Requirements, Environmental Fate Data Requirements						
850.1730	Fish bioconcentration	TPA	12 months	9	4/29/2013 - submitted Waiver - based on guideline criteria.	Waiting for response from EPA
Toxicology Data Requirements						
870.3465	Subchronic inhalation tox study - 28 day	DCPA	24 months	1	4/29/2013 - Promised Study, but requested 28 day study instead of 90 day. 8/7/2013 - Received an informal approval to complete the 28 day inhalation. 1/29/2014 - Submitted data (MRID 49307501).	Waiting for response from EPA

Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
870.6200	Neurotoxicity battery (acute and subchronic studies)	DCPA	12 months	1	4/29/2013 - Developing Data. 1/29/2014 - Two studies included in January submission (MRID 49307502, MRID 49307503).	Waiting for response from EPA
870.7800	Immunotoxicity	DCPA	12 months	9	4/29/2013 - Waiver submitted. 9/23/2013 - Received informal approval to waive this requirement.	Guideline Waived
860.1900	Field accumulation in rotational crops	DCPA	36 months	5	4/29/2013 - Request to upgrade current study. 7/30/2014 - Received EPA HED review dated 7/7/2014 stating Data remains outstanding. 7/31/2014 - Received EPA HED review dated 10/23/2013 stating additional data is requested. 9/24/2014 - In response to reviews, AMVAC submitting justification submission for 860.1900.	Waiting for response from EPA
ss-1066	Chronic Sediment - Hyalella Azteca	DCPA	24 months	1	4/29/2013 - Developing Data, Submitted Protocol. 10/20/2014 - Received EPA review dated 3/20/2014. 12/15/2014 - Notified EPA the Final reports are anticipated to be submitted by June 15, 2016. 3/19/2015 - EPA sent email confirmation allowing AMVAC to move forward with this study.	3/15/2016 - Submitted data (MRID TBD).

Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
ss-1069	Chronic Sediment - Chironomus dilutus	DCPA	24 months	1	4/29/2013 - Developing Data, Submitted Protocol. 10/20/2014 - Received EPA review dated 3/20/2014. 12/15/2014 - Notified EPA the Final reports are anticipated to be submitted by June 15, 2016. 3/19/2015 - EPA sent email confirmation allowing AMVAC to move forward with this study.	3/15/2016 - Submitted data (MRID TBD).
ss-1072	Chronic Sediment - Leptocheirus plumulosus	DCPA	24 months	1	4/29/2013 - Developing Data, Submitted Protocol. 10/20/2014 - Received EPA review dated 3/20/2014. 12/15/2014 - Notified EPA additional method development needed by the lab and proposes to update the Agency by March 31, 2015. 3/30/2015 - Sent EPA status update as promised. Lab still working on protocol; AMVAC requested the possibility to provide a status update in 6 months. 9/22/2015 - Sent EPA status update as promised. AMVAC requested to provide a status update in 6 months.	3/15/2016 - Submitted waiver (MRID TBD).

Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
ss - 1075	Avian inhalation toxicity	DCPA	12 months	9	4/29/2013 - Submitted Waiver - delete Air application use.	Waiting for response from EPA
ss - thyroid tox	Comparative thyroid study	DCPA	24 months	1	4/29/2013 - Developing Data, Submitted Protocol. 10/21/2014 - Received EPA review dated 11/19/2013. EPA requested revised protocol by the end of November. 11/26/2014 - Submitted revised protocol. 2/10/2015 - EPA requested PDF of protocol and methods. 2/11/2015 - Submitted PDF of protocol and methods. 3/19/2015 - Conference call with EPA to discuss protocol revisions needed. 4/1/2015 - Submitted revised protocol.	6/18/2015 - EPA sent email confirmation allowing AMVAC to move forward with this study.

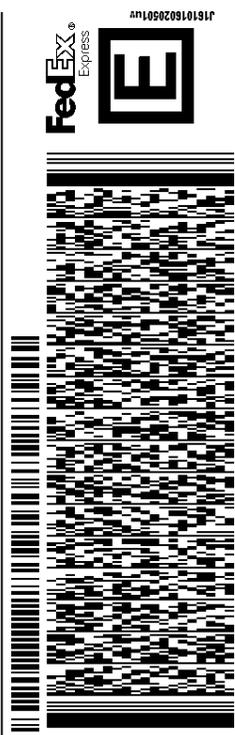
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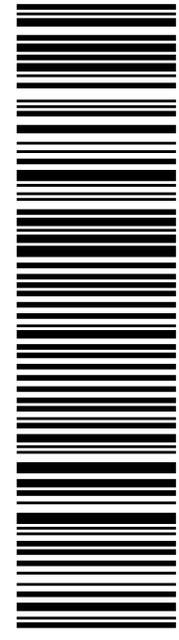
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