

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

BEFORE THE ADMINISTRATOR

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

PETITIONER AMVAC CHEMICAL CORPORATION'S EXHIBIT INDEX

Pursuant to the June 3, 2022, Order Scheduling Hearing and Prehearing Procedures entered in this matter, Petitioner AMVAC Chemical Corporation (“AMVAC”), is submitting the following exhibits (“PAX”) that it may seek to enter into evidence in this matter. References to “JX” below are to Joint Exhibits filed separately. PAX Exhibits marked with an asterisk below contain AMVAC Confidential Business Information (“CBI”). Pursuant to 40 C.F.R. § 22.5, AMVAC is submitting redacted versions of these materials. A complete copy of the documents containing information claimed confidential is also being filed with the Office of Administrative Law Judges.

- PAX 1 – Emails between Julie Porter, AMVAC, and Matthew Manupella, EPA, October 21, 2014 through October 23, 2014.
- PAX 2* – Revised Protocol Submission for the Comparative Thyroid Study, November 26, 2014.

- PAX 3 – Emails between Julie Porter, AMVAC, and Jill Bloom, EPA, February 11, 2015.
- PAX 4* – Comparative Thyroid Toxicity Protocol Review, attachment to PAX 20.
- PAX 5 – Email from Julie Porter, AMVAC, to Marquee King, EPA, April 1, 2015.
- PAX 6* – DCPA GDCI Data Call in Revised Thyroid Protocol, attachment to PAX 5.
- PAX 7 – Proof of Submittal of Validation Report for the Immunoassay Method.
- PAX 8 – Email from Jon Wood, AMVAC, to Jill Bloom, EPA, January 25, 2017.
- PAX 9 – Update on DCPA Developmental Thyroid Studies, attachment to JX 10.
- PAX 10* – DCPA Developmental Thyroid Studies, attachments to JX. 11.
- PAX 11 – Email from Jon Wood, AMVAC, to Jordan Page, EPA, February 12, 2018.
- PAX 12 – January 2018 Quarterly Update, attachment to PAX 11.
- PAX 13* – May 2018 Quarterly Update, Attachment to PAX 14.
- PAX 14 – Emails between Jordan Page, EPA, and Jon Wood, AMVAC, May 17, 2018 through May 18, 2018.
- PAX 15 – November 2018 Quarterly Update, Attachment to JX 17.
- PAX 16 – February 2019 Quarterly Update, Attachment to JX 18.
- PAX 17 – Email from Jordan Page, EPA, to Jon Wood, AMVAC, February 26, 2019.
- PAX 18 – June 2019 Quarterly Update, Attachment to JX 80.
- PAX 19 – EPA Study Plan Review for Range-Finding and CTA for DCPA, Attachment to PAX 20.
- PAX 20 – Email from Jordan Page, EPA, to Jon Wood, AMVAC, September 24, 2019.
- PAX 21 – Email chain between Jon Wood, AMVAC, and Jordan Page, EPA and others between February 20, 2019 and December 13, 2019

- PAX 22 – December 2019 Quarterly Update, Attachment to PAX 21.
- PAX 23 – Email from Jon Wood, AMVAC, to Jordan Page, EPA, March 5, 2020.
- PAX 24* – CTA Study Plan Review for a Ranging Finding and CTA, December 10, 2019, Attachment to PAX 23.
- PAX 25 – Protocol Review for an Updated Range-Finding Comparative Thyroid Assay for DCPA, March 19, 2020, Attachment to PAX 26.
- PAX 26 – Email from Jordan Page, EPA, to Jon Wood, AMVAC, April 14, 2020.
- PAX 27 – Email from Jon Wood, AMVAC, to James Douglass, EPA, August 6, 2020.
- PAX 28* – August 2020 Quarterly Report, Attachment to PAX 27.
- PAX 29 – December 2020 Quarterly Update, Attachment to JX 24.
- PAX 30* – DCPA Dose Range Finding QA'd Draft Report, March 22, 2022, Attachment to JX 23.
- PAX 31* – DCPA Main Pre and Post Natal Developmental Comparative Thyroid Study in CD Rats by Oral Administration, March 24, 2021, Attachment to JX 23.
- PAX 32 – April 2020 Quarterly Update, Attachment to JX 24.
- PAX 33 – EPA Comments on DCPA CTA Protocol, Attachment to JX 24.
- PAX 34 – Review of Protocol for an Oral (Gavage) CTA, with a Lactational Exposure Assessment in Sprague Dawley Rats, Attachment to JX 24.
- PAX 35 – Emails between Ann Jonynas, AMVAC, and James Douglass, EPA, January 26, 2022 through February 15, 2022.
- PAX 36* – Historical Control Thyroid Hormone Data, Attachment to JX PAX 35.
- PAX 37 – Various Emails and Attached Labels, Attachments to JX 50.

- PAX 38 – Email from Jon Wood, AMVAC, to James Douglass, EPA (October 29, 2020), Attaching JX 22.
- PAX 39* – August 2017 Positive Control Study Report, an attachment to JX 12.
- PAX 40 – Email from Jon Wood, AMVAC to Jordan Page, EPA, November 9, 2017.
- PAX 41* – April 2020 CTA Quarterly Status Update, attachment to JX 20.
- PAX 42 – Submission of Reports and Quarterly Update ISO Registration Review: DCPA ss Guideline Requirement CTA, August 24, 2018.
- PAX 43 – Review of the Existing Thyroid Toxicity Data and Residual Uncertainty Related to the Lack of a Definitive Comparative Thyroid Assay, March 21, 2022.
- PAX 44 – AMVAC FIFRA 2ee Recommendation, Dacthal Flowable Herbicide Directions for Use, Attachment to JX 47.

Date: June 17, 2022

Respectfully Submitted,

/s/ Hume M. Ross
David B. Weinberg
Tracy A. Heinzman
Keith A. Matthews
Hume M. Ross
WILEY REIN LLP
2050 M ST NW
Washington, DC 20036
Telephone: (202) 719-7000
dweinberg@wiley.law
theinzman@wiley.law
kmatthews@wiley.law
hross@wiley.law

Counsel for AMVAC Chemical Corp.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Petitioner AMVAC Chemical Corporation's Exhibit Index**, and the referenced PAX Exhibits with information claimed to be confidential redacted, were sent on June 17, 2022, to the following parties in the manner indicated below. A complete copy of the documents containing information claimed confidential is also being filed with the Office of Administrative Law Judges.

/s/ Hume M. Ross
Hume M. Ross

Copy by OALJ E-Filing System to:

Mary Angeles
Headquarters Hearing Clerk
U.S. Environmental Protection Agency
Office of Administrative Law Judges
Ronald Reagan Building, Rm. M1200
1300 Pennsylvania Ave. NW
Washington, DC 20004

Copies by Electronic Mail to:

Forrest Pittman
Pesticides and Toxic Substances Law Office
Office of General Counsel
U.S. Environmental Protection Agency
Mail Code 2310A
1200 Pennsylvania Avenue NW
Washington, DC 20460
Email: pittman.forrest@epa.gov

Cristen S. Rose
Haynes Boone
800 17th Street NW
Washington, DC 20006
Email: cristen.rose@haynesboone.com

Counsel for Grower Petitioners

Counsel for Respondent

Dated June 17, 2022