

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

January 9, 2023

**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 degree in Chemical Engineering 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 Chemical Corp. ("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 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 AMVAC.

5. Specifically, I manage the Supply Chain and Operations for Dimethyl Tetrachloroterephthalate ("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 ("EUP"s) 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. Dacthal Flowable and Dacthal 75-W are sold, distributed, and used year-round in the United States.

9. [REDACTED]

10. I do not have precise data on the quantity of DCPA EUPs that may currently be available from distributors or may have already been purchased by growers, however, based on historical sales and use patterns, I would not expect these amounts to be sufficient to satisfy DCPA EUP demand through the end of 2023 or beyond.

11. AMVAC is currently working to obtain more DCPA Technical from which it could formulate additional EUPs to supply expected demand in 2023 and beyond.

12. Given the uncertainty as to when any possible suspension order may take effect, it is not possible to know if AMVAC will be able to formulate additional EUPs from additional technical to meet expected grower demand in 2023 and beyond.

13. 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.

14. 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 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 9th day of January 2023.

/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, January 9, 2023, as indicated below.

/s/ Hume M. Ross  
Hume M. Ross

Copy by OALJ E-Filing System to:

Mary Angeles  
Headquarters Hearing Clerk  
U.S. Environmental Protection Agency  
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*Counsel for Respondent*