

# **Exhibit 31**



September 24, 2014

Susan Bartow  
U.S. Environmental Protection Agency  
Document Processing Desk (DCI/PRD)  
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  
Response to EPA letter dated July 30, 2014

Dear Ms. Bartow:

This submission is in response to the Generic Data Call-In (GDCI) Notice dated January 31, 2013, more specifically the EPA letter with your signature dated July 30, 2014 with the subject stating "Response to Comments on the Residue Chemistry Requirements in GDCI-0798701-1140".

For historical reference, AMVAC included or addressed the appropriate response and support documents requested to fulfill the initial 90 day response requirement on April 29, 2013. EPA responded to two of the requests on the following dates through email. On August 7, 2013, EPA allowed AMVAC to complete the suggested 28-day Sub-Chronic Inhalation study to fulfill the 90-day Inhalation study (Guideline No. 870.3465). On September 23, 2013, EPA waived the Immunotoxicity requirement (Guideline No. 870.7800). Then on January 29, 2014 AMVAC submitted the 12 month response including several new and existing studies, additional justification and provided EPA a 12-month status update spreadsheet.

Recently, on July 30, 2014 AMVAC received your email including the subject EPA letter and the HED science review dated July 7, 2014 titled "DCPA: HED Response to (12 Month) Comments on the Residue Chemistry Requirements of the Generic Data Call-In (GDCI-0798701-1140)" which accepted Guideline No. 860.1380 and rejected Guideline No. 860.1900. This review also referenced an earlier HED review dated October 23, 2013 titled "DCPA: HED Response to Comments on the Residue Chemistry Requirements of the Generic Data Call-In (GDCI-0798701-1140)" which AMVAC had not yet received. As a result, AMVAC requested the referenced review from EPA and received it on July 31, 2014. In response to the EPA letter, the October 2013 and July 2014 review, today AMVAC is providing the attached justification to fulfill Guideline No. 860.1900 which should also allow acceptability of the waivers for the following guidelines: Guideline No. 860.1300, 860.1340, and 860.1480.

In an effort to track the various guidelines required, the enclosed spreadsheet titled "Status of DCPA Registration Review DCI" dated September 24, 2014 provides the status of each guideline.

As discussed in this letter, please find the following documents enclosed:

- Response for Fulfilling 860.1900; Field Accumulation in Rotational Crops (8/11/2014)
- Status of DCPA Registration Review DCI (8/24/2014)

Please feel free to contact me at 949-221-6104 or email [juliep@amvac-chemical.com](mailto:juliep@amvac-chemical.com) if you have any questions or need further information.

Best regards,

A handwritten signature in cursive script, appearing to read "Julie Porter", written in black ink.

Julie Porter  
Regulatory Product Manager

## **Response for Fulfilling 860.1900; Field Accumulation in Rotational Crops**

On April 29, 2013 AMVAC (Amvac Chemical Corporation) provided a response to EPA concerning the outstanding 860.1900 field accumulation in rotational crops study requirement, which we referred to as the DCPA GDCI Data Call In (Order Number GDIC-0798701-1140) Chemical # PC Code: 078701 CAS #: 1861-32-1; 90-Day Response. At that time, we had not received EPA's October 23, 2013 HED memorandum, "DCPA (Dacthal): HED Response to Comments on the Residue Chemistry Requirements of the Generic Data Call-In (GDCI-0798701-1140), which explained the Agency's rationale for designating the rotational crop requirement as unfulfilled. Now that we have received this document and have a clear understanding of the issue at hand, we are herein responding with our proposal on how AMVAC intends to fill this outstanding data gap.

As a prerequisite to addressing the data requirement appropriately, we can confirm that we do not intend to change the currently labeled rotational restriction of 8 months that is required to prevent crop injury. It is also AMVAC's intent to permit replanting of only those crops that are listed on the label for treatment and for which current tolerances exist. On this basis, it should only be required that AMVAC provide evidence that 8-month replanted crops would not exceed the tolerances defined for the same crops when directly treated. Two field accumulation in rotational crop studies have previously been submitted to the Agency, which have residue data for root, leafy, and grain crops. The measured residue levels included the total of parent compound and of the two degradation products: monomethylterephthalate (SDS-1449) and tetraterephthalic acid (SDS-954).

In the Donalsonville, GA study, Dacthal W-75, a wettable powder containing 75% DCPA, was applied to a field at a rate of 10.5 lbs ai/A. Crops were initially targeted for replant at 1 month, 3-months, and 1 year; however due to crop failure, several crops were replanted closer to 7-months after application. For purposes of an 8-month replant assessment, we have utilized both the 3 month and ca. 7-month replants to represent the maximum expected residue concentration associated with 8-month replants. All residue levels were below 0.16 ppm total Dacthal residues. Results are compiled in Table I.

In the Rosa, LA study, Dacthal W-75, a wettable powder containing 75% DCPA, was also applied to a field at a rate of 10.5 lbs ai/A. Crops were replanted at 1 month, 3-months, and 1 year. For purposes of an 8-month replant assessment, we have utilized the 3 month replants to represent the maximum expected residue concentration associated with 8-month replants. All residue levels were below 0.73 ppm total Dacthal residues. Results are compiled in Table II.

Currently, Dacthal has tolerances for a wide variety of crops. Those tolerances are provided in Table III.

A comparison of the lowest tolerances for crops within the crop group (or similar) are compared with the highest residues on a rotated crop commodity within a crop group based on the two rotational crop studies. This assessment demonstrates that the current tolerances in place are fully adequate for the indicated rotational crops. This is even the case for crops that are replanted at 90-91 days, although AMVAC intends to maintain the 8-month rotational crop interval.

On the basis of AMVAC's label decision, we believe that the data presented here is fully adequate for fulfilling the requirement: 860.1900; Field Accumulation in Rotational Crops. Our assessment indicates that by maintaining the imposed 8-month replant restriction for all crops, that there are appropriate tolerances already in place for the crops that AMVAC intends to be permitted for rotation per our current label stipulations.

Table I

## Results from Donalsonville, GA Study

Analytical Residue Results for Samples Replanted 90 Days after Treatment							
Crop Group	Crop	Pre-plant Interval (d/mo)	Post-harvest Interval (d)	DCPA (ppm)	SDS-1449 (ppm)	SDS-954 (ppm)	Total as DCPA (ppm)
Leafy Vegetables	Mustard leaves	220/ ca. 7	248	<0.01	<0.01	<0.01	<0.01
	Lettuce leaves	220/ ca. 7	380	<0.01	<0.01	<0.01	<0.01
	Radish Leaves	220/ ca. 7	248	<0.01	<0.01	<0.01	<0.01
	Carrot leaves	220/ ca. 7	342	<0.01	<0.01	<0.01	<0.01
Root Crops	Radish roots	220/ ca. 7	248	<0.01	<0.01	<0.01	<0.01
	Carrot roots	220/ ca. 7	342	0.03	<0.01	0.12	0.16
Seed crops	Corn Seed	91/ ca. 3	205	<0.01	<0.01	0.01	0.01
	Oat seed	213/ ca. 7	437	<0.01	<0.01	<0.01	<0.01
	Sorghum seed	91/ ca. 3	192	<0.01	<0.01	<0.01	<0.01
Animal feedstocks	Corn fodder	91/ ca. 3	205	<0.01	<0.01	0.03	0.04
	Sorghum fodder	91/ ca. 3	192	<0.01	<0.01	0.15	0.16
	Oat forage	213/ ca. 7	364	<0.01	0.02	<0.01	0.02
	Oat straw	213/ ca. 7	437	<0.01	<0.01	<0.01	<0.01

**Table II Results from Rosa, LA Study**

<b>Analytical Residue Results for Samples Replanted 90 Days after Treatment</b>							
<b>Crop Group</b>	<b>Crop</b>	<b>Pre-plant Interval (d/mo)</b>	<b>Post-harvest Interval (d)</b>	<b>DCPA (ppm)</b>	<b>SDS-1449 (ppm)</b>	<b>SDS-954 (ppm)</b>	<b>Total as DCPA (ppm)</b>
<b>Leafy Vegetables</b>	Mustard leaves	90/ ca. 3	141	0.01	<0.01	0.07	0.09
	Lettuce leaves	90/ ca. 3	162	0.02	<0.01	0.65	0.73
	Radish Leaves	90/ ca. 3	242	<0.01	<0.01	0.10	0.11
	Carrot leaves	90/ ca. 3	130	0.02	<0.01	0.13	0.16
<b>Root Crops</b>	Radish roots	90/ ca. 3	242	<0.01	<0.01	0.29	0.32
	Carrot roots	90/ ca. 3	130	0.04	<0.01	0.14	0.20
<b>Seed crops</b>	Corn Seed	90/ ca. 3	201	<0.01	<0.01	<0.01	<0.01
	Sorghum seed	90/ ca. 3	201	<0.01	<0.01	<0.01	<0.01
<b>Animal feedstocks</b>	Corn fodder	90/ ca. 3	201	<0.01	0.01	0.10	0.12
	Corn Silage	90/ ca. 3	167	<0.01	<0.01	0.11	0.12
	Sorghum fodder	90/ ca. 3	201	<0.01	<0.01	0.04	0.04

**Table III Tolerances for Dacthal**

<b>Tolerances for Dacthal</b>					
<b>Crop Group</b>	<b>Crop</b>	<b>Indirect or Inadvertent Residue Tolerances (ppm)</b>	<b>Regional Registration Tolerances (ppm)</b>	<b>General Tolerances (ppm)</b>	<b>Lowest Group Tolerance (ppm)</b>
<b>Leafy Vegetables or Similar</b>	Basil dry leaves	20			2
	Basil fresh leaves	5			
	Brassica, leafy, group 5			5	
	Chicory tops	5			
	Chive	5			
	Coriander, leaves	5			
	Dill	5			
	Lettuce	2			
	Marjoram	5			
	Parsley, dried leaves	20			
	Parsley, leaves	5			
	Radicchio	5			
	Radish, oriental, tops	2			
	Radish, tops		15		
Turnip, tops	5				
<b>Root Crops or Similar</b>	Celeriac	2			1
	Chicory, roots	2			
	Horseradish			2	
	Onion, bulb			1	
	Onion, green			1	
	Garlic			1	
	Ginseng			2	
	Potato	2			
	Radish, oriental, roots	2			
	Radish, roots		2		
	Rutabaga	2			
	Sweet potato	2			
	Turnip, roots	2			
	Yam, true, tuber	2			



**Table III Tolerances for Dacthal (cont.)**

<b>Tolerances for Dacthal</b>				
<b>Crop Group</b>	<b>Crop</b>	<b>Indirect or Inadvertent Residue Tolerances (ppm)</b>	<b>General Tolerances (ppm)</b>	<b>Lowest Group Tolerance (ppm)</b>
<b>Seed crops or Similar</b>	Bean, dry	2		0.05
	Bean, mung, seed	2		
	Bean, snap, succulent	2		
	Corn, field, grain	0.05		
	Corn, pop, grain	0.05		
	Corn, sweet, kernel plus cob with husks removed	0.05		
	Cotton, undelinted seed	0.2		
	Pea, blackeyed, seed	2		
	Soybean	2		
<b>Animal feedstocks</b>	Corn, field, stover	0.4		0.4
	Corn, pop, forage	0.4		
	Corn, pop, stover	0.4		
	Corn, sweet, forage	0.4		
	Corn, sweet, stover	0.4		
<b>Other</b>	Cantaloupe		1	1
	Eggplant	1		
	Muskmelon		1	
	Pepper	2		
	Pimento	2		
	Squash, summer	1		
	Squash, winter	1		
	Strawberry		2	
	Tomato		1	
	Watermelon		1	

**Table IV                      Tolerances vs Crop Rotation Residues  
for Dacthal**

<b>Tolerances for Dacthal</b>		
<b>Crop Group</b>	<b>Lowest Group Tolerance (ppm)</b>	<b>Highest Study-based Crop Residue in Rotational Studies (ppm)</b>
<b>Leafy Vegetables or Similar</b>	2	0.73 <sup>1/</sup>
<b>Root Crops or Similar</b>	1	0.32 <sup>1/</sup>
<b>Seed crops or Similar</b>	0.05	0.01 <sup>2/</sup>
<b>Animal feedstocks</b>	0.4	0.16 <sup>2/</sup>
<b>Other</b>	1	NA

1/ 90 day replant results for support of 8 month pre-plant interval

2/ 91 day replant results for support of 8 month pre-plant interval

## References

Formanik, J. B. (1991) Determination of residues of DCPA (dimethyl tetrachloroterephthalate, SDS-893), its degradation products and HCB on crops and soil from a crop rotation study near Donalsonville, GA – 1989, 1990; Document No. 3509-89-0364-CR-001; Reported by Ricerca, Inc.; AMVAC Study No. 100-RES-017; MRID 42155504.

Formanik, J. B. (1992) Determination of residues of DCPA (dimethyl tetrachloroterephthalate, SDS-893), its degradation products and HCB on crops and soil from a crop rotation study near Rosa, LA – 1989, 1990; Document No. 3509-89-0364-CR-002; Reported by Ricerca, Inc.; AMVAC Study No. 100-RES-018; MRID 42298303.

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)"

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.	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 - Citing existing study MRID 44082601.	Waiting for response from EPA
835.2120	Hydrolysis	TPA	12 months	6	4/29/2013 - Citing existing study MRID 114648.	Waiting for response from EPA
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.	Waiting for response from EPA

Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
835.4200	Anaerobic soil metabolism	TPA	24 months	6	4/29/2013 - Citing 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.	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 - Citing - EFED document	Waiting for response from EPA
835.6100	Terrestrial field dissipation	DCPA	24 months	6	4/29/2013 - Citing 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
<b>Nontarget Plant Protection Data Requirements</b>						
850.4100	Tier I Plant tox - Seedling Emergence	DCPA	12 months	1	4/29/2013 - Developing data. 1/29/2014 - Submitted data.	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.	Waiting for response from EPA

Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
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.	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 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
<b>Residue Chemistry Data Requirements for Food Uses</b>						
860.1300	Nature of the residue: poultry	DCPA	24 months	7	4/29/2013 - Waiver submitted to delete alfalfa. 10/23/2013 - EPA HED review: Waiver possibly accepted, but need additional data regarding 860.1900 for confirmation.	9/24/2014 - AMVAC submitting justification submission for 860.1900

Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
860.1340	Residue analytical method: livestock commodities	DCPA	24 months	7	4/29/2013 - Waiver submitted to delete ruminant commodities. 10/23/2013 - EPA HED review: Waiver possibly accepted, but need additional data regarding 860.1900 for confirmation.	9/24/2014 - AMVAC submitting justification submission for 860.1900
860.1380	Storage stability	DCPA	24 months	5	4/29/2013 - Request to upgrade study - Citing several studies. 10/23/2013 - EPA HED review: Acknowledged AMVAC's intention to submit additional data. 1/29/2014 - Provided justification. 7/7/2014 - EPA HED review: Requirement satisfied.	Guideline Satisfied
860.1480	Meat/milk/ poultry/eggs: ruminants	DCPA	24 months	7	4/29/2013 - Waiver submitted to delete alfalfa, white potatoes, and peas. 10/23/2013 - EPA HED review: Waiver possibly accepted, but need additional data regarding 860.1900 for confirmation.	9/24/2014 - AMVAC submitting justification submission for 860.1900
<b>Terrestrial and Aquatic Nontarget Organisms Data Requirements</b>						
850.1010	Acute tox, freshwater invertebrates	DCPA	12 months	4	4/29/2013 - Promised to submit existing data. 1/29/2014 - Submitted data.	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.	Waiting for response from EPA

Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
850.1025	Acute tox, oyster (shell deposition)	DCPA	12 months	1	4/29/2013 - Developing data. 1/29/2014 - Submitted data.	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.	Waiting for response from EPA
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.	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 data.	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 data.	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.	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



Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
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.	Waiting for response from EPA
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.	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.	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
850.2100	Acute avian oral, passerine species	DCPA	12 months	1	4/29/2013 - Developing Data, Submitted Protocol.	Waiting for response from EPA
850.2300	Avian reproduction	DCPA	24 months	6	4/29/2013 - Citing Existing Study - MRID 47550001 and MRID 47550002.	Waiting for response from EPA

Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
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.	Waiting for response from EPA
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.	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. 10/23/2013 - EPA HED review: Additional data requested. 7/7/2014 - EPA HED review: Data remains outstanding. AMVAC has drafted justification which will be submitted shortly.	9/24/2014 - AMVAC submitting justification submission for 860.1900

Guideline	Guideline Description	Test Substance	Due	Response Code	Submission Information	Current Status
ss-1066	Chronic Sediment - Hyalella Azteca	DCPA	24 months	1	4/29/2013 - Developing Data, Submitted Protocol.	Waiting for response from EPA
ss-1069	Chronic Sediment - Chironomus dilutus	DCPA	24 months	1	4/29/2013 - Developing Data, Submitted Protocol.	Waiting for response from EPA
ss-1072	Chronic Sediment - Leptocheirus plumulosus	DCPA	24 months	1	4/29/2013 - Developing Data, Submitted Protocol.	Waiting for response from EPA
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.	Waiting for response from EPA - doing some investigatory work on methodology.