

# **Joint Exhibit 50**

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**From:** McMahon, Niamh  
**Sent:** Thursday, May 5, 2022 3:45 PM  
**To:** McMahon, Niamh  
**Subject:** FW: GDCI-078701-1140 (DCPA)  
**Attachments:** 20180116 RE EPA Registration Numbers 5481-487 -490 -491.msg; DACTHAL End-Use Label Amendments\_FW: Prohibited use sites on non-technical formulations of DCPA; RE: EPA Registration Numbers 5481-487, -490, -491; RE: EPA Registration Numbers 5481-487, -490, -491

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**From:** Wood, Jon <JonW@amvac.com>  
**Sent:** Friday, March 25, 2022 2:13 PM  
**To:** Bloom, Jill <Bloom.Jill@epa.gov>  
**Subject:** RE: GDCI-078701-1140 (DCPA)

Hi Jill – yes, it was great catching up with you as well and thanks for the retirement well wishes 😊 .....

The Dacthal labels referenced below (5481-487, 5481-490, and 5481-491) have colorful submission histories that I believe I have captured with these select emails and their attachments.

Attached four emails dated as follows:

- 07-Sep-2017
  - Email to Jordan Page with courtesy copies of label amendments and CDX receipts for all 3 products, submitted 08-Jun-2017 in response to DCI discussions with the Agency. This represents the first (and only) submission through the CDX portal.
    - All labels coded 20170608.
- 16-Jan-2018
  - Email to Sarah Meadows with clean copies of labels for all 3 products, submitted in response Agency request. Also included a *replacement* label for 5481-487.
    - Labels coded 20170608 for 5481-490 and 5481-491.
    - Replacement label coded 20180110 for 5481-487.
- 11-Mar-2019
  - Email to Sarah Meadows with clean copies of labels for all 3 products, submitted in response to Agency comments. This email string also contains technical discussion (see 24-Jan-2018 email).
    - All labels coded 20190225.
- 23-Aug-2019
  - Email to Sarah Meadows with clean and REDLINE copies of labels for all 3 products, submitted in response to Agency comments of 09-Aug-20219. I believe this submission contains the most recently proposed labeling for all 3 products.
    - All labels coded 20190822.

I hope this addresses your needs Jill. Please let me know if you think a call would help clarify.

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



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**From:** Bloom, Jill <[Bloom.Jill@epa.gov](mailto:Bloom.Jill@epa.gov)>  
**Sent:** Wednesday, March 23, 2022 12:04 PM  
**To:** Wood, Jon <[JonW@amvac.com](mailto:JonW@amvac.com)>  
**Subject:** RE: GDCI-078701-1140 (DCPA)

Hi, Jon. It was nice to speak with you today. Congratulations on your upcoming retirement.

The email below refers to several submitted label amendments that are relevant to the DCPA residue chemistry data requirements (see yellow highlights). It would be very helpful if you could provide copies of the relevant submissions. If you have the dates of the submissions and any associated cover letters or other contemporaneous correspondence that were sent with them, that would also be helpful. Thank-you very much.

Jill

Jill Bloom, Team Leader  
Risk Management and Implementation Branch 5, Pesticide Re-evaluation Division  
Office of Pesticide Programs, US Environmental Protection Agency  
[Bloom.jill@epa.gov](mailto:Bloom.jill@epa.gov)  
Phone as of April 24: (202) 566-2342

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**From:** Wood, Jon <[JonW@amvac.com](mailto:JonW@amvac.com)>  
**Sent:** Thursday, August 6, 2020 7:52 PM  
**To:** Douglass, James <[douglass.james@epa.gov](mailto:douglass.james@epa.gov)>  
**Cc:** Bloom, Jill <[Bloom.Jill@epa.gov](mailto:Bloom.Jill@epa.gov)>; Britton, Cathryn <[Britton.Cathryn@epa.gov](mailto: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  
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AMVAC Chemical Corporation  
4695 MacArthur Court  
Suite 1200  
Newport Beach, CA 92660  
Office: (949) 221-6109  
Mobile: (714) 651-7541



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**From:** Douglass, James <[douglass.james@epa.gov](mailto:douglass.james@epa.gov)>  
**Sent:** Monday, July 20, 2020 12:04 PM  
**To:** Wood, Jon <[JonW@amvac.com](mailto:JonW@amvac.com)>  
**Cc:** Bloom, Jill <[Bloom.Jill@epa.gov](mailto:Bloom.Jill@epa.gov)>; Britton, Cathryn <[Britton.Cathryn@epa.gov](mailto: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](mailto:douglass.james@epa.gov)

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**From:** Wood, Jon <[JonW@amvac.com](mailto:JonW@amvac.com)>

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

**To:** Douglass, James <[douglass.james@epa.gov](mailto:douglass.james@epa.gov)>

**Cc:** Bloom, Jill <[Bloom.Jill@epa.gov](mailto:Bloom.Jill@epa.gov)>; Britton, Cathryn <[Britton.Cathryn@epa.gov](mailto: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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Newport Beach, CA 92660

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**From:** Douglass, James <[douglass.james@epa.gov](mailto:douglass.james@epa.gov)>

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

**To:** Wood, Jon <[JonW@amvac.com](mailto:JonW@amvac.com)>

**Cc:** Bloom, Jill <[Bloom.Jill@epa.gov](mailto:Bloom.Jill@epa.gov)>; Britton, Cathryn <[Britton.Cathryn@epa.gov](mailto: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](mailto:douglass.james@epa.gov)

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**From:** Wood, Jon <[JonW@amvac.com](mailto:JonW@amvac.com)>

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

**To:** Douglass, James <[douglass.james@epa.gov](mailto:douglass.james@epa.gov)>

**Cc:** Bloom, Jill <[Bloom.Jill@epa.gov](mailto:Bloom.Jill@epa.gov)>; Britton, Cathryn <[Britton.Cathryn@epa.gov](mailto: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*

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**From:** Douglass, James <[douglass.james@epa.gov](mailto:douglass.james@epa.gov)>  
**Sent:** Tuesday, July 7, 2020 5:54 AM  
**To:** Wood, Jon <[JonW@amvac.com](mailto:JonW@amvac.com)>  
**Cc:** Bloom, Jill <[Bloom.Jill@epa.gov](mailto:Bloom.Jill@epa.gov)>; Britton, Cathryn <[Britton.Cathryn@epa.gov](mailto: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](mailto:douglass.james@epa.gov)

Risk Management and Implementation Branch 5  
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