

Exhibit 54



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 01, 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

AMVAC CHEMICAL CORPORATION
4695 MACARTHUR COURT, SUITE 1200
NEWPORT BEACH, CA 92660-1706

Report of Analysis for Compliance with PR Notice 11-03

Thank you for your submittal of 01-OCT-14. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



49477600

September 30, 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
Data Submission to Fulfill the Acute Avian Oral study, Guideline No. 850.2100

Dear Ms. Bartow:

This submission is in response to the Generic Data Call-In (GDCI) Notice dated January 31, 2013, more specifically the submission of data to fulfill Guideline No. 850.2100.

For historical reference, below is a timeline of events regarding the GDCI:

- 4/29/2013 - AMVAC included or addressed the appropriate response and support documents requested to fulfill the initial 90 day response requirement.
- 8/7/2013 - EPA allowed AMVAC to complete the suggested 28-day Sub-Chronic Inhalation study to fulfill the 90-day Inhalation study (Guideline No. 870.3465).
- 9/23/2013 - EPA waived the Immunotoxicity requirement (Guideline No. 870.7800).
- 1/29/2014 - AMVAC submitted the 12 month response including several new and existing studies, additional justification and provided EPA a 12-month status update spreadsheet.
- 7/30/2014 – AMVAC received 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.
- 7/31/2014 – The 7/30/2014 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.
- 9/24/2014 - AMVAC responded to the EPA letter dated July 30, 2014, the October 2013 HED Review and the July 2014 HED review by providing 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 regards to this submission, Margaret Hathaway requested a protocol and species via phone conversation on March 27, 2013. AMVAC submitted the 90-day response on April 29, 2013 which included the promise to generate the data and the protocol for EPA's review. On February 29, 2014 EPA asked if AMVAC would agree to use the HLS passerine acute approved protocol. AMVAC agreed in email on March 6, 2014 to use the protocol and requested an extension until October 30, 2014 to generate the data. Today AMVAC is submitting the data to fulfill the Acute Avian Oral study, Guideline No. 850.2100.

For your reference, please find three copies of the following document enclosed:

Guideline No.	Amvac Study No.	Study Title	Study No.	MRID
850.2100	100-AVW-013	DCPA (Chlorthal Dimethyl): Acute Oral Toxicity (LD50) to the Zebra finch	BDG0198	49477601

In an effort to track the various guidelines required, the enclosed spreadsheet titled "Status of DCPA Registration Review DCI" has been updated. 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
Regulatory Product Manager



United States
 Environmental Protection Agency
 (7504P)
 Washington, DC 20460

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