

Joint Exhibit 47

From: Douglass, James <douglass.james@epa.gov>
Sent: Wednesday, March 24, 2021 12:42 PM
To: Wood, Jon
Cc: Bloom, Jill; Britton, Cathryn
Subject: RE: DCPA - Use Patterns Clarified

Categories: DCPA - US

Thank you, Jon. I will forward this to the EFED team and reach out with any clarification they may need.

James Douglass
Chemical Review Manager, RMIB 5/PRD/OPP/OCSP/US. EPA
703-347-8630
douglass.james@epa.gov

From: Wood, Jon <JonW@amvac.com>
Sent: Tuesday, March 23, 2021 7:57 PM
To: Douglass, James <douglass.james@epa.gov>
Cc: Bloom, Jill <Bloom.Jill@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>
Subject: RE: DCPA - Use Patterns Clarified

Hi James,

As you may know, we have been working with RD to amend Directions For Use (DFU) language on our Dacthal end-use product labels. I realize that risk assessments can only rely upon currently approved labeling, but I want to bring this to your attention at this time as many of the inquiries from EFED below are also being addressed with revised labeling to RD.

FYI, please see the attached email that represents our latest response to RD's comments on DFU language for our Flowable product (5481-487). Included in the email is our revised DRAFT label (Ref. ID [20210322](#)) that could possibly be stamped/approved (amended) by RD in the very near future. This updated DRAFT label reflects current agricultural practices and contains both Ag and non-Ag uses.

Regarding the questions from EFED, you will see that our responses (in blue) mostly point to this DRAFT label because it corrects ambiguous language (pointed out by both RD and PRD) and represents our commitments to restrictions etc.

Let me know if further clarification is needed.

Best regards,

Jon

Office: (949) 221-6109

Mobile: (714) 651-7541



From: Douglass, James <douglass.james@epa.gov>
Sent: Monday, March 8, 2021 2:28 PM
To: Wood, Jon <JonW@amvac.com>
Cc: Bloom, Jill <Bloom.Jill@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>
Subject: RE: DCPA - Use Patterns Clarified

Hello Jon,

I have some follow-up questions from our Environmental Fate and Effects Division on the use pattern information that AMVAC provided for DCPA. Here is a slightly amended account of their concerns:

“For each use site, the registrant clarified the number of applications per crop cycle, total pounds per crop cycle, and the expected number of crop cycles per year. The maximum single application rate is 10.5 lbs ai/A, and at 2 applications a total of 21 lbs ai/A per crop cycle can occur. –correct, see DRAFT label attached.....

However, since these rates are listed as per crop cycle and not per year, some vegetable crops such as radish have short growing seasons, up to 3 crop cycles can occur in southern states such as CA, TX and FL. Therefore, EFED estimates up to 63 lbs ai/A per calendar year could be applied using that logic. – The maximum rates are restricted to annual use (i.e., do not exceed 21 lbs. a.i. per acre per year regardless of crop growth cycles).....

However, in the footnotes of the table provided by the registrant (see below), the following text could be inconsistent with the information they provided in the table. The registrant claims that ‘...the total amount of the ai never exceeds the annual maximum of 21 lbs/A.’ – the quoted statement is applicable and is repeated throughout DRAFT label attached.....

Additionally, in the footnote of the label they provided, the registrant indicated that the maximum annual application rate to turf is 24 lbs ai/A/yr. However, according to the table provided by the registrant, the total annual application rate would be 25.5 lbs ai/A for Annual Bluegrass. Furthermore, the label ending in -487 has recommendations in the ‘Remarks’ column for annual bluegrass to be in addition to crabgrass control (2 applications for a total of 15.75 lbs ai/A) with ‘Should be used following an early spring application for crabgrass control.’ Therefore, the total annual application rate on turf could be as high as 41.25 lbs ai/A. –multiple applications at lower rates can be applied during the year as long as the annual maximums are not exceeded (i.e., DRAFT label indicates maximum of 25.5 lbs ai/Acre per year for Turf).

In reviewing the three Section 3 labels, we did not find label language that explicitly states these 21 or 24 lb ai annual maximums for the different use sites. As such, **we were wondering if the registrant would be willing to commit to putting these maximum annual rates on the label?** –yes –see attached DRAFT labeling Because right now with the rates listed as per crop cycle with the potential for multiple crop cycles it could be interpreted to have usage much higher than 21 or 24 lb ai/A/year.

Also, in the original table to the registrant, **ornamentals** as a use site were not included. We were wondering if you would you ask the **registrant to verify the number of applications per year and total amount of ai applied per acre per year (not sure if it would be 21 or 24 lb ai or even some other value)?** – yes, attached DRAFT labeling has annual maximum rates listed for each use and ‘Ornamental’ has been added to clarify ‘Ornamental Nursery Stock’ and ‘Ornamental Turf’ sections.

Registrant comment-

‘The Maximum number of applications to a crop per calendar year or crop cycle will vary depending upon the number of crops grown each year, weed pressures, and other agricultural practices. Dacthal is often applied at lower than maximum rates with repeat applications to follow. In some cases, it is recommended that the 10.5 lbs. rate be split into 2 smaller sequential applications (e.g., see attached 2ee recommendation for onions in GA and NC). **Regardless of how many applications made, the total amount of active ingredient never exceeds the annual maximum of 21 lbs./Acre (24 lbs./Acre for some weed species in Turf).** – annual maximums (lbs. active ingredient /Acre / year) are listed for each use on the attached DRAFT label (regardless of crop growth cycles).....

a. *Typical number of crops grown each year = 1

b. ****Number of crops grown each year = 1 to 3****

So, in summary, I was hoping you would include in your response 1) AMVAC's commitment to adding maximum annual application rates to product labels and 2) for use on ornamentals, a clarification of the number of applications per year and the total amount of active ingredient applied per acre per year. – see attached DRAFT label for our commitment

Thank you,
James Douglass
Chemical Review Manager, RMIB 5/PRD/OPP/OCSPP/U.S. EPA
703-347-8630
douglass.james@epa.gov

From: Wood, Jon <JonW@amvac.com>
Sent: Thursday, February 25, 2021 10:49 AM
To: Douglass, James <douglass.james@epa.gov>
Cc: Bloom, Jill <Bloom.Jill@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>
Subject: RE: DCPA - Use Patterns Clarified

Hi James,

I have reached out to our Dacthal technical manager and his general response to your questions follows:

“For all intents and purposes, if you draw a line at the 35th parallel across the US, then states north of this line will only have 1 crop cycle per season of the crops on the Dacthal label and the states south may have up to 3 on some crops. I welcome any comments on this.

Geographically, one restriction might be in areas where the crops are grown on organic soils, like peat, Dacthal isn't used.”

I realize you were hoping for greater detail, but I thought I would share this with you in the hope that it satisfies your current needs. I think the key takeaway is that soil types dictate rates. Please let me know if you need more detail.

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



From: Douglass, James <douglass.james@epa.gov>
Sent: Tuesday, February 9, 2021 3:51 PM
To: Wood, Jon <JonW@amvac.com>
Cc: Bloom, Jill <Bloom.Jill@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>
Subject: RE: DCPA - Use Patterns Clarified

Hi Jon,

As promised, I'm following up with some clarification requests.

- 1) Several crops in this table are listed with applications per crop cycle. Which states does AMVAC believe multiple crop cycles per year of these crops will be grown? It would be most useful to the Agency to have a breakdown by crop; location; and maximum number of crop cycles per year for that crop and location, if possible.
- 2) Could you please identify any geographic restrictions that might exist with these products?

We know you moved quickly to get this information to us in the first place, so please know we appreciate it. Also, we appreciated your citation of maximum annual rates, regardless of the number of crop cycles; that distinction is helpful.

Thanks again for your help,
James Douglass
Chemical Review Manager, RMIB 5/PRD/OPP/OCSPP/U.S. EPA
703-347-8630
douglass.james@epa.gov

From: Wood, Jon <JonW@amvac.com>
Sent: Tuesday, February 9, 2021 1:03 PM
To: Douglass, James <douglass.james@epa.gov>
Cc: Bloom, Jill <Bloom.Jill@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>
Subject: DCPA - Use Patterns Clarified
Importance: High

Hi James,

Attached please find--

1. Your table of Use Site assumptions-- now populated with AMVAC's notes that hopefully clarify Dacthal use patterns per our understanding of current Ag practices.
2. An example of the use of split applications (per FIFRA 2ee recommendation) to onions in GA and NC.

It is my hope that this answers all of the Agency's questions regarding Dacthal use parameters. However, if further clarification is needed please don't hesitate to contact me by mobile phone or email.

Thanks again for your patience!!

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



From: Wood, Jon
Sent: Tuesday, February 9, 2021 7:43 AM
To: Douglass, James <douglass.james@epa.gov>

Cc: Bloom, Jill <Bloom.Jill@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>

Subject: RE: Time for a quick DCPA call this afternoon?

Hi James,

I received final comments from my technical rep last night so will be sending this over as soon as possible today -expect it in a couple of hours as I need to finish a call first.....thanks for your patience!
Jon

From: Douglass, James <douglass.james@epa.gov>

Sent: Tuesday, February 9, 2021 7:15 AM

To: Wood, Jon <JonW@amvac.com>

Cc: Bloom, Jill <Bloom.Jill@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>

Subject: RE: Time for a quick DCPA call this afternoon?

Hi Jon,

Just following up on this.

Thank you,
James Douglass
Chemical Review Manager, RMIB 5/PRD/OPP/OCSPP/U.S. EPA
703-347-8630
douglass.james@epa.gov

From: Wood, Jon <JonW@amvac.com>

Sent: Friday, February 5, 2021 2:08 PM

To: Douglass, James <douglass.james@epa.gov>

Cc: Bloom, Jill <Bloom.Jill@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>

Subject: RE: Time for a quick DCPA call this afternoon?

Hi James,

Update - I have filled in most of the blanks in your table but still need inputs from a couple of technical sales reps. I expect to send the completed table over to you later this afternoon but I might run into the weekend, so Monday latest.

Thanks and have a great weekend!

Jon

Office: (949) 221-6109

Mobile: (714) 651-7541



From: Douglass, James <douglass.james@epa.gov>

Sent: Monday, February 1, 2021 9:57 AM

To: Wood, Jon <JonW@amvac.com>

Cc: Bloom, Jill <Bloom.Jill@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>

Subject: Time for a quick DCPA call this afternoon?

Hello Jon,

As we begin to prepare our risk assessments for DCPA (dacthal), we have multiple questions regarding the use parameters. Attached is a table with parameters that we immediately need clarified for registration review. Do you have time for a quick call with us today to start sorting this out? If so, let me know when you're available and I'll get a conference line for us.

Thank you,
James Douglass
Chemical Review Manager
703-347-8630
douglass.james@epa.gov

Risk Management and Implementation Branch 5
Pesticide Re-evaluation Division
Office of Pesticide Programs
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency