

Exhibit 21



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

VIA EMAIL

Mr. Jon C. Wood
AMVAC Chemical Corporation
4695 MacArthur Court, Suite 1200
Newport Beach, CA 92660

Subject: Notification of Outstanding Data Requirements, and Anticipated Registration Review Schedule for DCPA

Dear Mr. Wood:

EPA is contacting AMVAC to confirm that the Agency intends to complete all Registration Review Interim Decisions by October 1, 2022 for all pesticides registered as of October 1, 2007, fifteen years after the initiation of Registration Review. In order to meet this deadline for DCPA, EPA expects to complete the draft risk assessments in June 2021. A substantial portion of the data required in the Data Call-In (DCI) (see below) has not yet been submitted and is outstanding. The Agency will rely upon data available at the time when the risk assessments are being developed. Where the Agency is lacking data, conservative assumptions may be used in their place to complete the risk assessments.

In 2013, the Agency issued a Generic DCI for DCPA which has not been completely satisfied:

- Generic Data Call-In GDCI-078701-1140, dated January 31, 2013

Please arrange for the generation and submission of any data which is not waived. The status of data required is listed in the table attached to this letter.

You are requested to respond within seven days to acknowledge receipt of this letter and to provide a response in 30 days indicating how you intend to satisfy the remaining data requirements, including a timeline for the generation and submission of outstanding data. EPA would like to remind AMVAC that completion and submission of required studies will not necessarily lead to changes in the risk estimates or safety factors used in the Draft Risk Assessment. These data are required by the DCI and, if submitted in a timely manner, EPA expects to use them in Registration Review to assess the risks of the chemical. If you have any questions, please feel free to contact James Douglass in writing at douglass.james@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Elissa Reaves".

Elissa Reaves, PhD
Acting Division Director,
Pesticide Re-evaluation Division
Office of Pesticide Programs

Attachment-- Status of DCPA GDCI-078701-1140 with Current Due Dates (as of October 16, 2020)

cc Ed Messina
Alexandra Dapolito Dunn, Esq.

Attachment--Status of DCPA GDCI-078701-1140 with Current Due Dates (as of October 16, 2020)

Guideline	Study Title	Study Status	Due Date
835.1230	Adsorption/desorption (TPA)	Supplemental ^{1,2} ; additional data not required.	01/31/2014
835.1240	Leaching (TPA)	In review	01/31/2014
835.2120	Hydrolysis (TPA)	Waived ²	
835.4100	Aerobic soil metabolism (TPA)	Supplemental ^{2,3} ; additional data not required.	01/31/2015
835.4200	Anaerobic soil metabolism (TPA)	Waiver request denied: outstanding ²	01/31/2015
835.4300	Aerobic aquatic metabolism (DCPA)	Supplemental ^{2,4} ; additional data not required.	01/31/2015
835.4300	Aerobic aquatic metabolism (TPA)	Waiver request denied; outstanding ⁵	01/31/2015
835.4400	Anaerobic aquatic metabolism (TPA)	Waiver request denied; outstanding ⁵	01/31/2015
835.6100	Terrestrial field dissipation (DCPA)	Waiver request denied; outstanding ⁵	01/31/2015
835.6100	Terrestrial field dissipation (TPA)	Waiver request denied; outstanding ⁵	01/31/2015
850.1010	Acute toxicity, freshwater invertebrates (daphnid) (DCPA)	In review	01/31/2014
850.1010	Acute toxicity, freshwater invertebrates (daphnid) (TPA)	In review	01/31/2014
850.1025	Acute toxicity, oyster (shell deposition) (DCPA)	In review	01/31/2014
850.1025	Acute toxicity, oyster (shell deposition) (TPA)	Waiver request denied; outstanding ⁵	01/31/2014
850.1035	Acute toxicity, mysid (estuarine/marine invertebrate) (DCPA)	In review	01/31/2014

Guideline	Study Title	Study Status	Due Date
850.1035	Acute toxicity mysid, (estuarine/marine invertebrate) (TPA)	Waiver request denied; outstanding ⁵	01/31/2014
850.1075	Acute toxicity, freshwater fish (rainbow trout) (DCPA)	In review	01/31/2014
850.1075	Acute toxicity, freshwater fish (bluegill sunfish) (DCPA)	In review	01/31/2014
850.1075	Acute toxicity, estuarine/marine fish (sheepshead minnow) (DCPA)	In review	01/31/2014
850.1075	Acute toxicity, freshwater fish (rainbow trout) (TPA)	Waiver request denied; outstanding ⁵	01/31/2014
850.1075	Acute toxicity, freshwater fish (bluegill sunfish) (TPA)	Waiver request denied; outstanding ⁵	01/31/2014
850.1075	Acute toxicity, estuarine/marine fish (sheepshead minnow) (TPA)	Waiver request denied; outstanding ⁵	01/31/2014
850.1300	Aquatic invertebrate life-cycle, freshwater (DCPA)	In review	01/31/2014
850.1300	Aquatic invertebrate life-cycle, freshwater (TPA)	In review	01/31/2014
850.1350	Aquatic invertebrate life-cycle, estuarine/marine (DCPA)	In review	01/31/2014
850.1350	Aquatic invertebrate life-cycle, estuarine/marine (TPA)	Waiver request denied; outstanding ⁵	01/31/2014
850.1400	Fish early life-stage (rainbow trout) (DCPA)	Supplemental ^{6, 7} ; additional data not required.	01/31/2014
850.1400	Fish early life-stage (bluegill sunfish) (DCPA)	Outstanding	01/31/2014
850.1400	Fish early life-stage (sheepshead minnow) (DCPA)	Outstanding	01/31/2014
850.1400	Fish early life-stage (rainbow trout) (TPA)	Waiver request denied; outstanding ⁵	01/31/2014
850.1400	Fish early life-stage (bluegill sunfish) (TPA)	Waiver request denied; outstanding ⁵	01/31/2014

Guideline	Study Title	Study Status	Due Date
850.1400	Fish early life-stage (sheepshead minnow) (TPA)	Waiver request denied; outstanding ⁵	01/31/2014
850.1730	Fish bio-concentration (TPA)	Waived ⁵	
850.2100	Acute avian oral, passerine species (DCPA)	In review	01/31/2014
850.2300	Avian reproduction (DCPA)	Waived ⁵	
850.4100	Tier I Plant toxicity - Seedling Emergence (DCPA)	In review	01/31/2014
850.4100	Tier I Plant toxicity - Seedling Emergence (TPA)	Waiver request denied; outstanding ⁵	01/31/2014
850.4150	Tier I Plant toxicity - Vegetative Vigor (DCPA)	In review	01/31/2014
850.4150	Tier I Plant toxicity - Vegetative Vigor (TPA)	Waived ⁸	01/31/2014
850.4400	Aquatic vascular plant growth Tier I/II Plant toxicity (<i>Lemna</i> spp.) (DCPA)	In review	01/31/2014
850.4400	Aquatic vascular plant growth Tier I/II Plant toxicity (<i>Lemna</i> spp.) (TPA)	Waiver request denied; outstanding ⁵	01/31/2014
850.4500	Algal toxicity test, Tier I/II (DCPA)	In review	01/31/2014
850.4500	Algal toxicity test, Tier I/II (TPA)	Outstanding	01/31/2014
860.1300	Nature of the residue: poultry	In review; label amendments submitted to satisfy guideline	01/31/2015
860.1340	Residue analytical method: livestock commodities	In review; label amendments submitted to satisfy guideline	01/31/2015
860.1380	Storage stability	Satisfied	
860.1480	Meat/milk/ poultry/eggs	In review; label amendments submitted to satisfy guideline	01/31/2015
860.1900	Field accumulation in rotational crops	In review; label amendments submitted to satisfy guideline	01/31/2016

Guideline	Study Title	Study Status	Due Date
870.3465	Subchronic inhalation toxicity study - 90 day	Satisfied	
870.6200	Neurotoxicity battery	Satisfied	
870.7800	Immunotoxicity	Waived ⁹	
SS-1066	Chronic Sediment - <i>Hyaella azteca</i> (DCPA)	In review	01/31/2015
SS-1069	Chronic Sediment - <i>Chironomus dilutus</i> (DCPA)	In review	01/31/2015
SS-1072	Chronic Sediment - <i>Leptocheirus plumulosus</i> (DCPA)	Waiver request denied; outstanding; Guideline 850.1740 (spiked whole sediment 10-day toxicity test, saltwater invertebrates) may proceed in the interim and results may allow EPA to reconsider waiver request for SS-1072 ¹⁰	01/31/2015
SS-1075	Avian inhalation toxicity (DCPA)	Waived on condition of limiting applications to ground applications only; waiver request denied if aerial applications remain on label. ²	10/31/2013
SS-thyroid toxicity	Comparative thyroid study (DCPA)	Outstanding	01/31/2015

¹ See 078701_49307517_DER-Fate_835.1230_01-10-17.pdf

² See 078701_413733+_RTWVR_DER_Memo_02-07-17.pdf

³ See 078701_49307516_DER-Fate_835.4100_01-13-17.pdf

⁴ See 078701_49307515_DER-Fate_835.4300_01-19-17.pdf

⁵ See 078701_413324+_RTWVR_03-21-14.pdf

⁶ See 078701_49307520_DER-ECO_NG_02-17-19.pdf

⁷ See 078701_DP420905_DER-Memo_02-26-19.pdf

⁸ See MRID 49115401, p. 15

⁹ See DCPA HED Tox Review.pdf

¹⁰ See 078701_432677_RTWVR_06-27-16.pdf