

Petitioner AMVAC

Exhibit 38

From: Wood, Jon <JonW@amvac.com>
Sent: Thursday, December 17, 2020 8:05 PM
To: 'Douglass, James'
Cc: Britton, Cathryn; Bloom, Jill
Subject: RE: Notification of Outstanding Data Requirements, and Anticipated Registration Review Schedule for DCPA
Attachments: 20201217 DCPA GDCI Waivers_cover signed.pdf

Hi James,

Attached is a courtesy copy of our response that was submitted today via the CDX e-portal. Please let me know if further clarification is needed.

Thank you for your consideration and continued patience.

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: Wednesday, November 4, 2020 3:01 PM
To: Wood, Jon <JonW@amvac.com>
Cc: Britton, Cathryn <Britton.Cathryn@epa.gov>; Bloom, Jill <Bloom.Jill@epa.gov>
Subject: RE: Notification of Outstanding Data Requirements, and Anticipated Registration Review Schedule for DCPA

Hi Jon,

This timing is acceptable: please do provide a response as soon as possible but no later than December 15th, 2020.

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: Tuesday, November 3, 2020 2:38 PM
To: Douglass, James <douglass.james@epa.gov>
Cc: Britton, Cathryn <Britton.Cathryn@epa.gov>; Bloom, Jill <Bloom.Jill@epa.gov>
Subject: RE: Notification of Outstanding Data Requirements, and Anticipated Registration Review Schedule for DCPA

Hi James,

I appreciate your consideration of this request and propose to provide our response on or before December 15th. Please let me know if that would be acceptable.

Thank you,

Jon

Jon C. Wood
Sr. Regulatory Manager
AMVAC Chemical Corporation
4695 MacArthur Court
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Newport Beach, CA 92660
Office: (949) 221-6109
Mobile: (714) 651-7541



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

Sent: Friday, October 30, 2020 11:06 AM

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

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

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

Hello Jon,

When do you anticipate you will be able to provide us with an update?

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, October 29, 2020 1:06 PM

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

Cc: Reaves, Elissa <Reaves.Elissa@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>

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

Importance: High

Hi James,

It has been brought to my attention that all of our technical resource is currently allocated to the preparation of technical responses/comments to 3 Preliminary Risk Assessments for which AMVAC is technical registrant (dichlorvos, naled, trichlorfon). Given that our work is expected to take us to the brink of docket closure (Nov 24), we respectfully request additional time with which to properly respond to the DCPA DCI requirements.

Please let me know at your earliest if this would be acceptable. Thank you for your consideration.

Best regards,

Jon

Jon C. Wood
Sr. Regulatory Manager
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4695 MacArthur Court
Suite 1200
Newport Beach, CA 92660
Office: (949) 221-6109
Mobile: (714) 651-7541



From: Wood, Jon

Sent: Wednesday, October 21, 2020 9:32 AM

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

Cc: Reaves, Elissa <Reaves.Elissa@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>

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

Thank you for this summary of DCI requirements for Dacthal and especially for updating the Agency's reviews of waiver requests. I confirm our receipt of the Notification and will submit a 30-day response to the Agency on or before November 16, 2020.

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: Friday, October 16, 2020 2:37 PM

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

Cc: Reaves, Elissa <Reaves.Elissa@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>

Subject: Notification of Outstanding Data Requirements, and Anticipated Registration Review Schedule for DCPA
Hello Mr. Wood,

Please see the attached letter and reference documents, which address data requirements for DCPA registration review. Please also confirm receipt.

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