

Joint Exhibit 35

Follow-up from DCPA Registration Review Registrant Meeting; March 17, 2017

Attendees:

- Amvac: Jon Wood (Chemical Manager), Dick Frelander (Director of Environmental Studies)
- PRD: Jill Bloom (TL), Marquee D. King (CRM), Tom Myers (SRA)

Action Items—Amvac

- Developmental thyroid data--study due Q4FY18; Amvac will provide Agency quarterly status updates beginning May-June
- Amendment to terminate uses--labels need to reflect use termination from Federal Register dated July 27, 2005 – Amvac will make changes to all Amvac product labels as needed
 - What is Amvac's timing for submitting the labels? The Agency requests that Amvac address the aerial application issue at the same time (see * below).
 - PRD will coordinate with RD
- General use parameter information for product labels--Amvac will clarify the following:
 - the maximum amount of DCPA to be applied per season and year for all use sites
 - maximum number of applications for all use sites/season and year
 - minimum retreatment intervals for all use sites
 - Clarification of use parameters can be articulated in correspondence with PRD; label changes to comport with the use parameters should not delay the use deletions and aerial prohibition amendment.
 - What is Amvac's time frame for clarifying use parameters?
- Usage data on turf/ornamentals
 - Of primary interest is information of number of pounds of DCPA used annually on turf and on ornamentals in the last 5 or so years.
 - Per the Summary Document, the following additional information would be helpful (we recognize that such data may not be available):
 - Geographical distribution of uses, areas of greatest use
 - Directly acquired county-level usage data (not derived from state level data).
 - What is the timeframe for Amvac's response?

Action items--Agency

- Aerial application – Amvac proposes to delete aerial applications from its DCPA product label so avian inhalation toxicity data can be waived; PRD to confirm with EFED or otherwise document
 - March 21, 2014 memo, “Response to registrant’s data waiver requests for environmental fate and ecological effects related data for the parent DCPA and the degradate TPA” documents recommendation that PRD waive the data requirement if the registrant prohibits aerial application on product labels. PRD concurs with the recommendation.
 - *Amvac should submit the amendments to remove aerial applications from the subject product labels along with the revisions reflecting the deletion of uses as detailed in the Federal Register Notice dated July 27, 2005
- SS-1072 (Chronic Sediment - *Leptocheirus plumulosus* study) Amvac wants assurance that if 10-day study yields no adverse effects, then the 28-day data requirement would be waived
 - June 27, 2016 memo “DCPA: Response to Waiver Request for the Chronic Sediment Toxicity Study with *Leptocheirus plumulosus*,” June 27, 2016, D432677 indicates that

the 28-day study is not waived even when the registrant submits report from the 10-day study

- Response to Amvac pending
- 860.1300 (nature of the residue: poultry) – confirm if alfalfa is deleted this study is no longer required (if not, which other commodities contribute to poultry feed)
 - Response to Amvac pending
- 860.1900 (field accumulation in rotational crops) – EPA needs to supply documentation of which rotational crops should be prohibited and identify plant back intervals
 - February 17, 2015 memo “DCPA (Dacthal): HED Response to Comments on the Residue Chemistry Requirement 860. 1900 (Field Accumulation in Rotational Crops) of the Generic Data Call-In (GDCI-0798701-1140),” D423450, lays out plant-back restrictions. These restrictions, in summary, indicate that “[r]otation to a crop with an established tolerance for residues of DCPA (40 CFR 180.185) is permitted with a minimum plant back interval of 8 months; rotation to any other crop is not permitted.”
 - Please note that some of the crops identified in the memo are to be de-listed from Amvac’s product labels and this memo should not be viewed as a rationale for retaining any of the use sites effectively terminated through the 6(f) process.
 - PRD will confirm and inform registrant
- 860.1340/860.1480 – can data requirements be waived?
 - Is this a matter of deleting uses on commodities that could be used in cattle feed (*i.e.*, potato, peas, and alfalfa; these last two are supposed to come off labels anyway)?
 - PRD will resolve and inform registrant

We also discussed the impurities batch analyses, which has been addressed with RD, but we would like to be copied on relevant correspondence

Attachments:

Response to registrant’s data waiver requests for environmental fate and ecological effects related data for the parent DCPA and the degrade TPA, March 21, 2014—discusses aerial application prohibition

DCPA: Response to Waiver Request for the Chronic Sediment Toxicity Study with Leptocheirus plumulosus, June 27, 2016—discusses waiver of 21-day study

DCPA (Dacthal): HED Response to Comments on the Residue Chemistry Requirement 860. 1900 (Field Accumulation in Rotational Crops) of the Generic Data Call-In (GDCI-0798701-1140), February 17, 2015--discusses plant back