

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**BEFORE THE ADMINISTRATOR**

In re FIFRA Section 3(c)(2)(B)	)	
Notice of Intent to Suspend	)	
Dimethyl Tetrachloroterephthalate (DCPA)	)	
Technical Registration	)	
	)	
AMVAC Chemical Corporation; Grower-Shipper	)	Docket No. FIFRA-HQ-2022-0002
Association of Central California; Sunheaven	)	
Farms, LLC; J&D Produce; Ratto Bros., Inc.; and	)	
Huntington Farms,	)	
	)	
Petitioners.	)	
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**PREHEARING EXCHANGE OF PETITIONERS GROWER GROUP**

In accordance with the Order Scheduling Hearing and Prehearing Procedures dated June 3, 2022, Petitioners the Grower-Shipper Association of Central California, Sunheaven Farms, LLC, J&D Produce, Ratto Bros., Inc., and Huntington Farms (collectively, the Grower Group) respectfully submit these Prehearing Exchange materials that concern the consistency of the Administrator’s determination with respect to existing stocks of Dimethyl Tetrachloroterephthalate (DCPA) with the Federal Insecticide, Fungicide and Rodenticide (FIFRA), 7 U.S.C. 136a *et seq.*

**(A) List of Expert and Fact Witnesses**

Fact Witness:

1. Christopher Valadez

Mr. Valadez is the President of the Grower-Shipper Association of California (“GSA”), a regional trade association founded in 1930 with a mission to advance families, food and farming in Central California. The organization currently represents approximately 300 members, which

consist primarily of farmers, shippers and processors of fruits and vegetables produced in Monterey, Santa Cruz, San Benito and Santa Clara Counties. The mission of GSA is to provide solutions-based programs and services covering diverse areas, including challenges of water supply and improving water quality; food safety and security; and pest and disease management and prevention.

Expert Witnesses:

1. Stephen A. Fennimore, Ph. D

Dr. Fennimore is an Extension Specialist and Weed Ecophysiologicalist in the Department of Plant Sciences at the University of California, Davis. His research and extension interests are in the development of integrated strategies for weed management in cut flower, vegetable crops and strawberries. A copy of his *curriculum vitae* is provided as PGX No. 4.

2. Richard Smith, M. Sc.

Mr. Smith is a Vegetable Crops and Weed Science Farm Advisor for the University of California Cooperative Extensive, Monterey County. His responsibilities include conducting research and educational programs in vegetable crop production and weed science for crops such as lettuce, cole crops, celery, onions, spinach peppers and squash. The primary areas of his expertise includes weed science, soil fertility and plant nutrition. A copy of his *curriculum vitae* is provided as PGX No. 5.

**(B) Verified Direct Testimony**

Attached.

**(C) Exhibits to be Introduced into Evidence by the Grower Group**

<b>Petitioner Grower Group Exhibit No. (“PGX”)</b>	<b>Title/Description</b>
1.	“Dacthal Economic Benefits Analysis” ERA Economics, LLC <i>(previously attached as Exhibit 1 to the Grower Group’s Objection and Hearing Request)</i>
2.	“Economic Value of the Herbicide Dacthal for Brassica and Allium Crops in California” Giannini Foundation of Agricultural Economics, University of California <i>(previously attached as Exhibit 2 to the Grower Group’s Objection and Hearing Request)</i>
3.	“An Economic and Pest Management Evaluation of the Herbicide Dacthal in California Agriculture” Prepared for California Department of Food and Agriculture Office of Pesticide Consultation and Analysis
4.	<i>Curriculum vitae</i> of Stephen A. Fennimore
5.	<i>Curriculum vitae</i> of Richard Smith

**(D) Matters as to Which the Grower Group Requests Official Notice**

There currently are no matters as to which the Grower Group requests that official notice be taken.

**(E) Interpretation Services**

The Grower Group does not require interpretative services.

DATED: June 17, 2022

Respectfully submitted,



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Cristen S. Rose  
HAYNES BOONE  
800 17th Street, NW  
Washington, DC 20006  
202.654.4506  
[cristen.rose@haynesboone.com](mailto:cristen.rose@haynesboone.com)

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**DIRECT TESTIMONY OF CHRISTOPHER VALADEZ**

1. I am Christopher Valadez. I am over the age of 18 and competent to testify as to the matters herein.

**I. BACKGROUND**

2. I was born and raised in the San Joaquin Valley of California and am a proud grandson of farmworkers who later worked to achieve their dream of becoming small-business owners.

3. I have been President of the Grower-Shipper Association of California (“GSA”) since May 2019. The GSA is a regional trade association founded in 1930 with a mission to advance families, food and farming in Central California. The organization currently represents approximately 300 members, which consist primarily of farmers, shippers and processors of fruits and vegetables produced in Monterey, Santa Cruz, San Benito and Santa Clara Counties. The mission of GSA is to provide solutions-based programs and services covering diverse areas, including challenges of water supply and improving water quality; food safety and security; and pest and disease management and prevention. When the pandemic began, the GSA also developed innovative housing, testing, education programs and vaccination programs.

4. Prior to GSA, I spent 11 years at the California Fresh Fruit Association as the organization's Director of Environmental & Regulatory Affairs. In this role, I shaped and addressed state wage and hour policies, as well as human health and safety, water supply and quality, food safety, air quality and political engagement.

5. In October 2016, I helped launch the Central Valley Farmworker Foundation in October 2016, which has since expanded statewide to become the California Farmworker Foundation. The California Farmworker Foundation is a non-profit organization that works at the grassroots level to bring innovative programs and services directly to farmworkers throughout California.

6. I also spent four years serving as Deputy District Director for former Congressman George Radanovich, providing outreach on federal policy matters affecting the agricultural economy, namely immigration and water policy.

7. In May 2019, I was appointed to serve on the California State Board of Food and Agriculture by Gov. Gavin Newsom. The Board serves the interest of the state's diverse agricultural community. As an advisory board, it addresses key issues that are of importance to California's farmers and ranchers, community stakeholders, and citizens.

## **II. CHALLENGES FACED BY THE PRODUCE INDUSTRY IN CALIFORNIA'S CENTRAL VALLEY**

8. The central coast produces a substantial share of U.S. fruit and vegetables for domestic and export markets. Cost and other pressures on the industry have been increasing over the last several years and are imposing an unprecedented set of challenges for farmers, shippers and processors of fruits and vegetables produced in California's Central Coast.

9. These market adjustments have impacted input costs including labor, material application, water quality and water supply, pandemic-induced changes, and changes in farming

practices to support food safety and industry sustainability goals. Each of these changes comes with higher costs, and all have materially increased the costs to raise, pack, and market a crop.

10. The work GSA has done on behalf of its members includes analysis of current, continuing, and impending cost pressures that growers and shippers on California's Central Coast are facing to help businesses across the industry supply chain better understand changes occurring in other parts of the chain, and how production costs are increasing as a result.

11. I touch on some of these changes and impacts below to illustrate that the industry is currently facing unprecedented challenges that touch all points of growing a crop and getting it to the American consumer. In this context, the loss of a DCPA, a crop protection tool that is critical for certain crops, could be catastrophic.

**A. Labor Costs and Shortages**

12. Labor costs have grown steadily and substantially across the produce industry, including in California. These increases are due to annual increases in minimum base wage, overtime pay, and H-2A visa worker costs.

13. By way of example, overtime costs also have significantly increased in California. Previously, overtime pay was required after 10 hours in a day or 60 hours in a week. Now, large farm employers (26+ employees) must pay overtime at 1.5 times the hourly rate for workers after 8 hours in a day or 40 hours in a week. (For smaller farms, this will phased in by 2025.) Due to the nature of farming operations, growers and shippers often must depend on employees working more than 40 hours per week. As a result, new overtime requirements will increase labor costs.

14. California farmers continue to find themselves short of employees to provide labor.

15. As labor shortages increase, seasonal immigrant farm labor can offset the impact of labor shortages and increasing overtime costs. The H-2A program, through which guest workers can be brought into the country for jobs in agriculture, has grown significantly. The program requires employers to incur substantial additional costs for visas, transportation and housing.

16. Hiring seasonal, H-2A guest labor requires that an employer submit to a certification process requiring satisfying three criteria each year to hire seasonal guest workers: (1) demonstrate efforts to recruit U.S. workers failed (which demonstrates insufficient domestic labor is available); (2) offer free and approved housing to both H-2A workers and out-of-area U.S. workers; and (3) pay an Adverse Effect Wage Rate (AEWR), which varies by state.

17. In California, AEWR has been on the rise, increasing from \$13.18/hour in 2018 to \$17.51/hour in 2022. From 2020 to 2022, for example, the AEWR increased by more than \$1/hour each year, with an increase of almost \$1.50/hour from 2021 to 2022. All H-2A workers, as well as any U.S. workers in comparable positions, must be paid no less than the same AEWR.

18. Despite rising wages, labor is increasingly scarce and increased need for labor has led to increased competition. At the same time, increased nonfarm employment opportunities in Mexico have resulted in fewer seasonal farm laborers available for the produce industry. As a result, grower-shippers must offer increased wages and other incentives to stay competitive in the labor market.

#### **B. Increased Costs and Competition for Transportation and Logistics**

19. Increased competition, shortages and availability issues also have impacted transportation and trucking. This is due in part to substantial increase in e-commerce as a result of the COVID-19 pandemic, and it has caused supply chain disruptions.



20. There is a shortage of drivers in the transportation industry. At the same time, the total number of allowable driver hours has been decreasing which has led to longer freight times and greater supply tension. Fewer drivers and reduced hours per driver have limited the supply of trucking, which has resulted in higher costs.

**C. Increased Costs and Competition for Pallets and Packaging**

21. Pallet and packaging costs have steadily and significantly increased since the COVID-19 pandemic began.

22. Increases in pallet and packaging costs are driven by increases in prices for raw materials used by packaging manufacturers and significantly higher demand for packaging by e-commerce as a result of the pandemic.

23. According to the ERA report, packaging costs have increased 15% or more from 2020-2021. The cost of wood pallet, driven by increases in lumber prices, has increased by 75% or more over that same period.

24. Corrugated cardboard, plastics, and other packaging inputs are used by e-commerce companies in substantially higher volumes than the produce industry. As a result, suppliers of these products typically keep a large inventory available for large e-commerce customers that represent a substantial share of their business. Smaller customers such as produce packaging supply companies can face shortages when there is scarcity.

**D. Challenges Posed by Weather, Drought and Climate Issues**

25. 2021 was the driest year on record in California, and growers expect these conditions to persist. This will cause additional water scarcity, hotter summers, and increased prevalence of wildfires. All these impacts will result in higher costs for the produce industry.

26. The ongoing impacts of severe drought on the central coast region and on the entire supply chain are expected to continue to increase costs to grow and ship fresh fruits and vegetables.

27. On the growing side, higher heat during the summer and variability in temperatures creates challenges for maintaining a healthy crop. It threatens or reduces yields and requires increased irrigation, which imposes additional challenges, including for irrigation systems, availability of water sources, and legal limitations on use of water.

28. The Salinas Valley and most of the other agricultural regions on the central coast depend primarily on groundwater, which is recharged by regional rainfall. When rain is limited for multiple years, as it has been, this puts added stress on groundwater availability.

29. As a result of these pressures, growers in most regions of California's central coast anticipate limitations on water that is available to them for farming under Groundwater Sustainability Plans (GSPs) being developed to comply with the Sustainable Groundwater Management Act. GSP implementation will require growers to pay higher costs for water and administration, in addition to potentially reducing the number of farmable acres in the region

30. Increasing frequency and severity of wildfires is also affecting produce industry costs. California faced an unprecedented wildfire season in 2020 and 2021, with many fires affecting central coast agricultural regions.

#### **E. Increased Costs for Other Inputs**

31. Growers also have seen increased costs for fertilizers and machinery. In addition, because these products and the raw materials for producing them are often imported, global supply chains disruptions have increased their prices.

32. Seed, chemicals, and fuel, have seen high volatility for the same and similar reasons.

### **III. IMPACT IF DACTAL NOT AVAILABLE TO GROWERS**

33. It is difficult to overstate the impact DCPA will have on growers and producers in the already extremely challenging environment discussed above.

34. Mechanical and hand weeding cannot replace DCPA.

35. Mechanical weeding is not yet fully mature and would impose significant hardships on the agronomic and economic livelihood of growers. To date, development and early-stage trials of mechanical and robotic weeding systems provide only incomplete and expensive results. Further, current technology for mechanical weeding does not allow removal of weeds when they cover the commercial crop during a time of critical growth. In contrast, during that critical period, DCPA provides residual benefits for weed control.

36. Hand weeding likewise is neither a viable nor an economic option. As noted, availability of labor that would be needed to weed by hand is sporadic and in short supply. If additional hand labor is obtained, it is a much more expensive labor solution as discussed above. In addition, during wildfires, California/OSHA's rules can limit or prevent workers from being in the field due to hazardous air quality conditions.

37. These supply challenges are real and substantial, and growers cannot count on being able to obtain hand labor when it is needed. If it is not available when needed, the impact can be devastating and result in crop loss, decreased yields and increased prices to the American consumer.

38. With the availability of labor currently sporadic and in short supply, there is no reason to believe the labor market can provide a labor force for hand weeding that can substitute

for DCPA. Growers cannot count on being able to obtain labor when it is needed, and if it is not available them, the impact can be devastating and result in crop loss and decreased yields. Even if sufficient labor were available, it is a much more expensive solution that would lead to substantially higher costs.

39. Use of labor also would not eliminate yield loss that can be expected to follow if DCPA is not available. Growers estimate damage to delicate crop feeder roots during increased cultivation and hand weeding would reduce yields by at least 10%. Yield losses would be greater in winter because rainy wet fields are impossible to cultivate or hand weed, so weeds will grow and compete.

40. Putting lack of availability and access, on average, the estimated costs associated with hand labor would be \$900-\$1,000 per acre.

41. With higher costs and lower returns, growers and producers face downward pressure on production as fewer acres are planted and harvested, or existing fields are managed less intensively (resulting in lower yields). The elimination of DCPA would put significant upward pressure on prices.

42. The impact of the yield losses and increased costs from the loss of DCPA will not be limited to growers. The American consumer also will incur the increased costs for crops that rely on DCPA directly, as well as increased costs for crops that are rotated with the crops treated with DCPA. The impact of these costs will be particularly acute given the already present impacts of inflation and rising input costs for growers and consumers.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

*Christopher Valadez*

June 16, 2022

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Christopher Valadez

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Date

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_____	)	

**DIRECT TESTIMONY OF STEPHEN A. FENNIMORE, Ph.D.**

1. I am Stephen A. Fennimore. I am over the age of 18 and competent to testify as to the matters herein.

**I. Background**

2. I am an Extension Specialist and Weed Ecophysiologicalist in the Department of Plant Sciences at the University of California, Davis.

3. I obtained my B.A. in 1977 in Public Affairs from the University of Oregon. In 1983, I obtained a Masters in Weed Science from the University of California, Davis (UC Davis). In 1997, I obtained my Ph.D. in Weed Science from Perdue University.

4. I have served in my current position as Extension Specialist and Weed Ecophysiologicalist in the Department of Plant Sciences at UC Davis since July 2009. Prior to that, I served as an Associate Extension Specialist and Weed Ecophysiologicalist in UC Davis' Department of Plant Sciences (July 2003 to June 2009) and held the same position in UC Davis' Department of Vegetable Crops (Sept. 1997 to June 2003).

5. My research and extension interests are in the development of integrated strategies for weed management in cut flower, vegetable crops and strawberries. The

management of weeds in most these crops is complicated by the limited number of herbicide and fumigant options as well as carryover concerns.

6. In partnership with growers, commodity organizations, Extension Farm Advisors, Extension Specialists, USDA-ARS Researchers and Pest Control Advisors, I develop strategies to maximize the value of currently available weed management tools.

7. My outreach activities focus on providing educational materials on the management of weeds in California cut flowers, vegetable crops, and strawberry.

8. I am a member of the American Society for Horticultural Science, California Weed Science Society, Weed Science Society of America, Methyl Bromide Alternatives Outreach, and European Weed Research Society – Physical and Cultural Weed Control Workgroup.

9. I have received numerous honors, awards and other recognition for my work in the area of weed science, including receipt of the California Weed Science Society Award of Excellence twice (2001 and 2016) and the Oscar Lorenz Award (2015). I also served as President of the California Weed Science Society and am currently the Chair of the WSSA Committee on Research and Competitive Grants. In 2019, I was a Fulbright Scholar in Uruguay on Weed management.

10. I have been widely published on issues related to weed control. A list of my publications since 2017 is provided in my *curriculum vitae* (PGX 4).

11. In 2018, I and my co-authors submitted a detailed analysis of the herbicide Dacthal, containing the DCPA, in California agriculture to the California Department of Food and Agriculture's Office of Pesticide Consultation and Analysis. *An Economic and Pest Management Evaluation of the Herbicide Dacthal in California Agriculture* (PGX 3). This

report was submitted in connection with the reevaluation of Dacthal/DCPA by California's Department of Pesticide Regulation.

## **II. DCPA IS A CRITICAL TOOL FOR WEED CONTROL**

12. DCPA was originally registered in 1958. It is a selective pre-emergence herbicide used for controlling annual grasses and certain broadleaved weeds. It stops these difficult-to-control broadleaf and grass weeds before they emerge, reduces the need for hand weeding, has excellent selectivity, provides residual activity and season long foundation control.

13. In particular, DCPA is an essential foundational tool for effective and economical control of yield-robbing grasses and broadleaf weeds in onions and small acreage brassica crops such as bok choy, Brussels sprouts, radish, kale, rapini, mustards, gai lon and kohlrabi. Brassica and allium crops account for the majority of the use of DCPA in California.

14. The brassica crops are critical components in their cropping systems in which crops must be rotated with unrelated crops to maintain soil health. They are very effective in adding organic matter to the soil, reducing inoculum levels of several soilborne diseases that would otherwise severely impact lettuce yields.

15. There are a limited number of herbicides that are registered for the same crops as DCPA. As such, it is a niche herbicide used in crops with few alternative herbicides that have similar selectivity and efficacy. As depicted in Tables 27-31 of PGX 3, there is not a direct substitute for DCPA and one or multiple other herbicides may provide only partial spectrum of control.

16. I discuss below some other active ingredients, but it is important to emphasize that none are equivalent replacements for DCPA. All have major weaknesses in terms of their management of key weeds, mainly broadleaves, and many are problematic for rotational crops,



with some even having label restrictions. As a result, use of any of these alternatives must be paired with greater use of mechanical and hand weeding, incurring the associated increase in production costs.

17. DCPA is the foundation for weed control in direct seeded onion. For onion and leeks, there is not another herbicide that can be applied from the time of seeding to 1-2 leaf onion. Other herbicides that can be applied on onion and leeks cannot be applied until after crop establishment (and have additional, significant limitations as noted below). Bromoxynil, for example, can be used for allium crops but, its use pattern is much later in the growth cycle than DCPA. Similarly, dimethenamid-P can only be applied after the two-leaf stage of onion. Thus, neither bromoxynil nor dimethenamid-P can provide the same control as DCPA or replace its uses.

18. In crops like radish, gai lon and bok choy, there are no alternatives to DCPA because these niche crops have no registered replacement for DCPA

19. Other herbicides lack the same uses and benefits as DCPA and have additional limitations. Oxyfluorfen lacks the breadth of uses, as it is not registered for use on green onion, leeks, Brussels sprouts, bok choy, gai lon and other brassica vegetables. It also is less effective in controlling grass weeds. In contrast to DCPA, oxyfluorfen also cannot be used for weed control during onion emergence and establishment.

20. Bensulide provides weaker weed control, and the spectrum of weeds it controls is more limited than DCPA.

21. Clethodim does not control broadleaf weeds and therefore also is not a candidate to replace DCPA.

22. Other products have additional limitations on top of limited uses and/or weed control that preclude their use as replacements for DCPA. Ethofumesate has a narrow weed spectrum and tends to cause crop injury to onion.

23. Pendimethalin controls fewer broadleaf weeds than DCPA, and has rotational crop restrictions that limit its ability to replace DCPA.

24. Clomazone and clopyralid are not suitable replacements to DCPA because they have long-lived soil residues and potential carryover to rotational crops.

25. Clopyralid can cause injury to rotational crops years after application, and it also is not registered on onion.

26. Napropamide also has rotational crop issues for celery and onion.

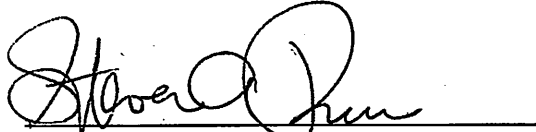
27. Trifluralin has a more limited weed spectrum than DCPA, must be mechanically incorporated in the soil and, once there, remains stable. As a result, it has a long residual period that can harm sensitive crops.

28. It also is worth noting that timely application of DCPA on onions, cucurbits, and leafy vegetables reduces the amount of pesticides used in comparison to other less effective herbicides.

29. The pipeline of new herbicides for vegetables has been empty for some time, so there also are no products on the horizon that could substitute for DCPA.

30. As discussed in much greater detail in PGX 3, loss of DCPA would have a significant, negative impact on the cost to produce crops and lower yields, both of which lead to higher prices.

I declare under the penalty of perjury under the laws of the United States of America that  
the foregoing is true and correct.

  
Steven A. Fennimore

June 17, 2022  
June 17, 2022

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\_\_\_\_\_ )

DIRECT TESTIMONY OF RICHARD SMITH

1. I am Richard Smith. I am over the age of 18 and competent to testify as to the matters herein.

**I. Background**

2. I am a Vegetable Crops and Weed Science Farm Advisor for the University of California Cooperative Extensive, Monterey County. I have worked with the University of California’s Cooperative Extension since 1985. Prior to that, I worked in the Agronomy Department of the University of California, Davis (UC Davis).

3. I received a M.S. in Agronomy from UC Davis in 1985. My undergraduate degree is in Biology from UC Davis.

4. My responsibilities as Vegetable Crops and Weed Science Farm Advisor include conducting research and educational programs in vegetable crop production and weed science. Crops include cool season vegetables such as lettuce, cole crops, celery, onions and spinach as well as warm season crops such as peppers, squash. I also establish research and educational programs to meet the needs of growers and the allied agricultural industry, conduct research on cultural practices, weed science, soil fertility and new crop development. The primary areas of my expertise includes weed science, soil fertility and plant nutrition.

5. My work has been recognized with numerous awards and honors, including ASHS Extension Publication Award for most outstanding publication on horticultural extension (2016), Western Extension Directors Association Award of Excellence (Farm Water Quality Project team member) (2008), California Weed Science Society Award of Excellence (2004) and the Oscar Lorenz Award from UC Davis' Department of Plant Science (2003).

6. I am a member of the American Society for Horticultural Science, the California Chapter of the American Society of Agronomy, and the Weed Science Society.

7. A list of my publications is provided in my *curriculum vitae*.

## **II. DCPA IS A CRITICAL HERBICIDE FOR ONIONS**

8. DCPA is a preemergent herbicide that controls annual grasses and certain broadleaf weeds before they emerge. DCPA controls lambsquarter, pigweed and purslane, and it greatly slows the growth of the nightshades.

9. Because of the broad range of weeds controlled by DCPA it is the key preemergent herbicide to economically control grasses in weeds in brassica crops such as bok choy, Brussels sprouts, broccoli, cauliflower, cabbages, radish, kale, rapini, mustards, collards, gai lon and kohlrabi. This is particularly critical in the cool season production regions and times of year in California as well as other states. In addition to the brassica crops, DCPA provides a critical weed control tool for use in onions.

10. Weed control onions is challenging and complex due to the nature of onions' growth. Onions are particularly susceptible to weed pressures because seedling development is slow which allows weeds to grow unabated and damage the vigor of the onion seedlings. In addition, onions do not form a protective canopy that effectively competes with weeds later in the crop cycle.

11. In addition, mechanical cultivation of onions is not possible because, in nearly all onion production systems, the seedlings are too close together to allow cultivation implements to pass without damaging the onion seedlings.

12. In simple terms, weed control for onions involves a two-step process. DCPA provides the first level of critical, preemergent control by greatly reducing and/or slowing down weeds. This allows the second level of control in post-emergent onions to work more effectively.

13. There is no another preemergent herbicide registered for use on onions that provides the same efficacy as DCPA.

14. If DCPA is not available, onion growers will have much less effective tools for weed control in onions, leading to significantly lower yields and significantly greater hand weeding costs at a time when hand labor is in short supply throughout the country. This fact cannot be understated. The loss of DCPA will put the onion industry in a precarious position for addressing weed control issues and safeguarding yields.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



June 16, 2022

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Richard Smith

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Date

***In re FIFRA Section 3(c)(2)(B) Notice of Intent to Suspend Dimethyl  
Tetrachloroterephthalate (DCPA) Technical Registration***

AMVAC Chemical Corporation; Grower-Shipper Association of Central California; Sunheaven Farms, LLC; J&D Produce; Ratto Bros., Inc.; and Huntington Farms, Petitioners.  
Docket No. FIFRA-HQ-2022-0002

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **Prehearing Exchange of Petitioners the Grower Group**, dated June 17, 2022, were sent this day to the following parties in the manner indicated below.



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Cristen Rose

Copy by OALJ E-Filing System to:  
Mary Angeles, Headquarters Hearing Clerk  
U.S. Environmental Protection Agency  
Office of Administrative Law Judges  
Ronald Reagan Building, Rm. M1200  
1300 Pennsylvania Ave. NW  
Washington, DC 20004

Copy by Electronic Mail to:  
Erin Koch  
Forrest Pittman  
Pesticides and Toxic Substances Law Office  
Office of General Counsel  
U.S. Environmental Protection Agency  
Mail Code 2310A  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
202-564-9626  
[Pittman.Forrest@epa.gov](mailto:Pittman.Forrest@epa.gov)  
*Counsel for Respondent*

Hume M. Ross  
Tracy A. Heinzman  
Keith A. Matthews  
WILEY REIN LLP  
2050 M ST NW  
Washington, DC 20036  
Telephone: (202) 719-7000  
[HRoss@wiley.law](mailto:HRoss@wiley.law)  
[THeinzman@wiley.law](mailto:THeinzman@wiley.law)  
[KMatthews@wiley.law](mailto:KMatthews@wiley.law)

*Attorneys for Petitioner  
AMVAC Chemical Corp.*