

IN THE CIRCUIT COURT  
THIRD JUDICIAL CIRCUIT OF ILLINOIS  
MADISON COUNTY



HOLIDAY SHORES SANITARY DISTRICT, §  
Individually and on behalf of all others similarly §  
situated, §

Plaintiff, §

v. §

SYNGENTA CROP PROTECTION, INC. and §  
GROWMARK, INC., §

Defendants. §

Cause No. 2004-L-000710

**PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION DIRECTED TO  
DEFENDANT SYNGENTA CROP PROTECTION, INC.**

Pursuant to Rule 214 of the Illinois Supreme Court Rules, Plaintiff, by its attorneys, Korein Tillery, LLC, and Baron & Budd, PC, requests Defendant Syngenta Crop Protection, Inc., to produce and permit inspection of the following documents and things, in their best available form, at Korein Tillery, One U.S. Bank Plaza, 505 North 7th Street, Suite 2600, St. Louis, Missouri 63101-1625, or in such other reasonable location and form as is mutually agreed to by the parties, no later than twenty-eight (28) days after service of this request.

These Requests are to be answered in accordance with the following definitions and instructions, and these definitions and instructions are hereby incorporated by reference into each Request.

## DEFINITIONS

As used in these Requests, the following terms shall have the following meanings:

1. "Address" means the street address, city, state, zip code, and country.
2. "Atrazine" or "atrazine-containing product(s)" means atrazine, any product (including herbicides) containing atrazine, and atrazine degradate chemicals, including but not limited to desethylatrazine, deethylatrazine, deisopropylatrazine, diaminoatrazine, diaminochlorotriazine (or desethyldeisopropylatrazine), hydroxyatrazine, desethylhydroxyatrazine, and ammeline.
3. "Concerning" means relating to, referring to, describing, evidencing or constituting.
4. "Date" means the exact day, month, and year, if ascertainable, or if not, a description of the temporal relationship of the occurrence for which the date is sought to the closest dates which are ascertainable.
5. "Defendants" means Dow Agrosiences, LLC, Drexel Chemical, Co., Growmark, Inc., Makhteshim-Agan of North America, Inc., Sipcam Agro USA, Inc., Syngenta Crop Protection, Inc., United Agri Products, Inc., D/B/A UAP Loveland Products, Inc., and any predecessors, divisions, subdivisions, foreign subsidiaries, foreign subsidiaries of predecessors, domestic or foreign corporate parents, and/or affiliates.
6. "Degradate(s)" means any of the chemicals into which atrazine breaks down, including but not limited to chlorotriazines, deethylatrazine, deisopropylatrazine, and diaminoatrazine.
7. "Document(s)," "data," and/or "electronically stored information" is to be interpreted broadly to include but not limited to writings, records, files, correspondence, reports, memoranda, calendars, diaries, minutes, notes, research material, electronic messages, voicemail, e-mail, telephone message records or logs, computer and network activity logs, hard drives, backup data, removable computer storage media such as usb devices, hard drives, cd/dvd media, and memory storage devices, Web pages, databases, presentations, spreadsheets, software, books, ledgers and journals, orders, invoices, bills, drawings, images, photographs, video, and digital recordings. Information that serves to identify, locate, or link such material, such as file inventories, file folders, indices, and metadata, is also included in this definition.
8. "Health effects" means any effect or potential effect, adverse or otherwise, to human health or the health of other living organisms.
9. "Identify" means to provide sufficient information to allow a reasonable person to locate and comprehend the subject. For example, with respect to a person, this means to provide the full name, last known address (or date of death, if applicable), job title, employer name; with respect to an entity, this means to provide the name, address, principal place of business, and state of incorporation (if applicable); with respect to a document, this means to provide the

title, date, author, recipient, subject matter, description, and current custodian.

10. "Or" shall be construed either conjunctively or disjunctively to bring within the scope of these Requests for Production any information which might otherwise be construed to be outside their scope.
11. "Remediate" and "remediation" mean action to clean up, mitigate, correct, abate, minimize, eliminate, control, or prevent the presence, spreading, migration, leaking, leaching, volatilization, spilling, or transport of a substance or further release of a substance into the environment.
12. "Representative" means any partner, agent, employee, consultant, attorney, accountant, or anyone else acting or purporting to act for, at the direction of, or on behalf of another.
13. "State agency(ies)" means any and all agencies which regulate aspects of the herbicide industry, including but not limited to that state's Departments of Environmental Protection and/or Conservation.
14. "Study" or "studies" means all internal and external studies and all research, surveys, tests, investigations, assessments, drafts, and summaries of same and all communications concerning such study or studies.
15. "Triazine" or "triazine-containing product(s)" means triazine, any product (including herbicides) containing triazine, and triazine degradate chemicals.
16. "Water resource" or "water supply" means groundwater, surface water, and/or any system for the provision to the public of water for human consumption.
17. "You," "your," "yours," or "Syngenta" means the answering defendant and any of its merged, consolidated, or acquired predecessors, divisions, subdivisions, foreign subsidiaries, foreign subsidiaries of predecessors, domestic or foreign corporate parents, and/or affiliates including, but not limited to J.R. Geigy Limited, Ciba Crop Protection, Zeneca Agrochemicals, Ciba-Geigy Limited, and Novartis Agribusiness. This definition includes present or former officers, directors, agents, representatives, employees, and all other persons acting or purporting to act on behalf of Syngenta Crop Protection, Inc., or its predecessors, subsidiaries, and/or affiliates. "Predecessors" means any business firm, whether or not incorporated, which had all or some of its assets purchased or acquired by Syngenta Crop Protection, Inc., whether by merger, consolidation, or otherwise. "Subsidiaries" further means any business firm, whether or not incorporated, which is or was in any way owned or controlled, in whole or in part, by Syngenta Crop Protection, Inc., or its predecessors. Representative means any partner, agent, employee, consultant, attorney, accountant, or anyone else acting or purporting to act for, at the direction of, or on behalf of another.

## INSTRUCTIONS

The following instructions apply to these Requests:

1. Produce documents as maintained in the ordinary course of your business, or segregate the documents according to the Request in response to which they are produced, as required by Rule 214.
2. In the event the request is one to which you object, the reasons for the objection shall be stated with reasonable particularity.
3. If you object to part of a request, specify the part to which you object and produce the materials responsive to the remaining parts, as required by Rule 214.
4. With respect to any category of documents which you contend is in some way burdensome or oppressive, state the specific reasons for such objection, and produce examples of the responsive documents.
5. If you are not in possession, custody or control of any documents described in any one or more of the following requests, a written statement that you are not in possession, custody or control of any such documents and the name and address of the person who has possession, custody or control of any such documents is a sufficient response to the request. However, production of such documents shall be required if possession, custody or control of the same is in or with any of your agents, employees, servants, contractors, representatives, corporate parents, subsidiaries or affiliates.
6. If your response to any request should make reference, in whole or in part, to, or require the use of data, information, or records contained in any computerized form, please indicate the extent to which the answers relied on such data and attach a partial or whole copy of the record.
7. If any document is withheld from production hereunder on the basis of a claim of privilege or work product protection, please provide, for each such document, a description sufficiently detailed to allow Plaintiffs to evaluate the legitimacy of your claim of privilege. Such description shall include: the title and general subject matter of the document, the date of the document, the identity of all persons who participated in creating the document, the identity of each person who signed the document or over whose name the document was issued, the identity of each addressee and recipient of the document, the number of pages which comprise the document, a description of the nature and substance of the document, its attachments, if any, its present custodian and a description of the basis for each claimed privilege or work product protection.
8. If any document which forms a part of, or the entire basis for, any response to these requests has been destroyed, disposed of, or is no longer within your control, for each such document set forth the following explanations: (a) state when it was destroyed or disposed of; (b)

identify the name, title and address of the person who destroyed the document; (c) identify the name, title and address of the person who directed that it be destroyed or disposed of; (d) detail the reasons for the destruction or disposition; (e) describe the nature of the document; (f) identify the persons who created, sent and received the document; (g) state the date the document was prepared and transmitted (if different); (h) state, in as much detail as possible, the contents of the document; and (i) if it still exists, provide a copy of draft of such document.

### **REQUESTS FOR PRODUCTION**

1. Produce any and all studies and/or documents referring or relating to assessments or studies of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products and their risks to the environment that are in your possession, custody, or control, including drafts and/or published and unpublished assessments and/or studies done by you, at your request, or at the request of third parties.
2. Produce any and all studies and/or documents referring or relating to assessments or studies of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products related to health effects that are in your possession, custody, or control, including drafts and/or published and unpublished assessments and/or studies done by you, at your request, or at the request of third parties.
3. Produce any and all communications with, proposals to and from, and all documents referring or related to any laboratories that have done any studies regarding the health effects of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
4. Produce any and all studies, including drafts, published studies, unpublished studies, and/or documents referring or relating to assessments or studies of worker health at any facility in which you manufacture atrazine, atrazine-containing products, triazine, triazine-containing products, and/or constituents of such products, relating to potential health effects resulting from their exposure to such products.
5. Produce any and all records and/or documents referring or related to records of any medical testing program conducted by you or at your request for workers at any facility in which you manufacture atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products.
6. Produce any and all records and/or documents referring or related to records of cancers or other illnesses in humans or other living organisms that you have tracked from 1958 to present.
7. Produce any and all documents referring or relating to the following characteristics of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products:

- a. Fate and transport characteristics in soil and/or water;
  - b. Solubility in water;
  - c. Biodegradation;
  - d. Photo-decomposition;
  - e. Run-off characteristics;
  - f. Ability to contaminate and extent of contamination of water resources;
  - g. Health effects caused by ingestion;
  - h. Breakdown products;
  - i. The ability or inability to distinguish your atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products from those originating from any other manufacturer;
  - j. Effect of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products on the reproductive organs of amphibians;
  - k. Effect of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products on fertility;
  - l. Studies or other documents that discuss atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products causing or potentially causing fetal death;
  - m. Studies or other documents that discuss atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products as potential endocrine disruptors;
  - n. Studies or other documents that discuss atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products causing or potentially causing breast cancer;
  - o. Studies or other documents that discuss atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products causing or potentially causing harm at concentrations in water at or below three parts per billion (3 ppb);
  - p. Studies or other documents that discuss atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products causing or potentially causing harm to humans or animals at levels below three parts per billion (3 ppb);
  - q. Documents which discuss proposals to restrict or ban atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products.
8. Produce any and all documents referring, related to, or constituting communications between you, your employees, your agents, your representatives and/or any industry groups of which you are a member and domestic or foreign governmental agencies, pesticide industry associations, other pesticide manufacturers, customers, water providers, the public, or other persons or entities regarding the health effects of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products, their use, and/or their regulation.

9. Produce any and all documents referring, related to, or constituting communications between you, your employees, your agents, your representatives and/or any industry groups of which you are a member and domestic or foreign governmental agencies, pesticide industry associations, other pesticide manufacturers, customers, water providers, the public, or other persons or entities regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products, contaminating water resources.
10. Produce any and all documents referring to, relating to, or constituting any representations you have made or caused to be made to the public, to water providers, or to a governmental entity that atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products are not a health-hazard to humans or other living organisms, including representations that additional studies regarding the health effects of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products are unnecessary.
11. Produce any and all documents referring, related to, or constituting procedures, limitations, guidelines, or approval processes that those hired or contracted by you must follow regarding the publication of studies performed for you.
12. Produce any and all documents referring, related to, or constituting procedures, limitations, guidelines, or approval processes that those hired or contracted by you must follow regarding the publication of studies performed for you specifically regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
13. Produce any and all documents referring, related to, or constituting you retaining the right or a portion of the right to publish, limit publication, and/or prevent publication of studies performed for you.
14. Produce any and all documents referring, related to, or constituting you retaining the right or a portion of the right to publish, limit publication, and/or prevent publication of studies performed for you specifically regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
15. Provide any and all documents referring or relating to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products contaminating or having the potential to contaminate water resources.
16. Produce any and all documents that discuss or evidence any monitoring or testing programs done by you, at your direction, or that you are aware of that monitored water resources for the presence of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.

17. Produce any and all documents referring or relating to steps you have taken to prevent atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products from contaminating domestic or foreign water resources.
18. Produce any and all documents discussing or evidencing the remediation of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products from a water resource or soil, including, but not limited to, warnings, handbooks, or manuals.
19. Produce any and all documents discussing or evidencing the treatment of water resources contaminated with atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products, including, but not limited to, documents referencing or referring to costs and/or methodology of such treatment.
20. Produce any and all documents related to the appropriate response, program and/or protocol that you, a potential responsible party, water providers, and/or the state or local government should take where a water sample from a water resource, including public water supply system, evidences levels of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products, including but not limited to documents regarding any testing, cleanup or remediation that should take place, who should take action, and who should pay for it.
21. Produce any and all documents referring or related to any surveys or studies, including the surveys/studies themselves, which describe potential impacts on public drinking water supplies and/or wells due to contamination by atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
22. Produce any and all documents which refer or relate to your Material Safety Data Sheets (MSDSs), and any other product safety and handling documents regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products, including the MSDSs and other product safety and handling documents themselves, any documents that discuss or analyze the MSDSs or other documents in any way, and any drafts.
23. Produce any and all documents which refer or relate to labels, warnings, representations, or other documents regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products, that were provided to customers and/or downstream users, including the labels, warnings, representations, and other documents themselves and any drafts.
24. Produce any and all documents which refer or relate to labels, warnings, representations, or other documents regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products, that were provided to water providers, including the labels, warnings, representations, communications and other



documents themselves and any drafts.

25. Produce any and all documents which refer or relate to warnings provided to water providers, customers of water providers, or to the general public regarding the potential health effects and/or the contamination of water resources by atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products, including the warnings themselves and any drafts.
26. Provide any and all documents regarding your decision to or not to provide warnings to public water providers, to distributors, to downstream users, to consumers, to government regulators, or to the general public relating to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
27. Produce any and all documents which refer or relate to changes in labels pertaining to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products, including the labels themselves, drafts of the labels, and/or proposed labels.
28. Produce any and all documents which refer or relate to federal and/or state regulations of labels pertaining to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products, including the labels themselves, drafts of the labels, and/or proposed labels.
29. Produce a list of the names and addresses of all individuals who were involved in the consideration, development, adoption and circulation of any warnings related to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
30. Produce a list of the names and addresses of the group, department, title(s), or people who had final approval of any warnings related to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
31. Produce any and all documents referring or relating to health-related inquiries or complaints regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products, including the inquiries/complaints themselves, that you have received (or of which you are aware) from consumers, employees, contractors, downstream users, water providers or other persons or entities. Produce all documents referring or relating to your response to any such inquiries or complaints.
32. Produce any and all documents referring or relating to inquiries or complaints regarding water contamination by atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products, including the inquiries/complaints themselves, that you have received (or of which you are aware) from consumers, employees, contractors, downstream users, water providers or other persons or entities. Produce all documents referring or relating to your response to any such inquiries

or complaints.

33. Produce any and all documents referring or relating to inquiries or complaints regarding the efficacy of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products, including the complaints themselves, that you have received (or of which you are aware) from consumers, employees, contractors, downstream users, water providers or other persons or entities. Produce all documents referring or relating to your response to any such inquiries or complaints.
34. Produce any and all documents relating to the use of mesotrione as an alternative and/or competitor to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products.
35. Produce a list of the names and addresses of everyone who was involved in discussions regarding the feasibility of marketing and producing mesotrione.
36. Produce any and all documents relating to any consideration or deliberation by you to start making, manufacturing, and/or producing, atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products, including those identifying: the individuals involved in that decision making process; on what criteria or reasoning that decision was based; what studies or investigation (internal or otherwise) were done by you prior to the consideration or deliberation; and any individual(s) or departments who made any recommendations to the ultimate decision maker(s).
37. Produce any and all documents relating to any consideration or deliberation by you to stop manufacturing, producing, and/or making atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products, including those identifying: the individuals involved in that decision making process, on what criteria or reasoning that decision was based; what studies or investigation (internal or otherwise) were done by you prior to the consideration or deliberation; and any individual(s) or departments who made any recommendations to the ultimate decision maker(s).
38. Produce any and all documents referring or relating to alternatives to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products which you have developed, are developing, have sold, are selling, or of which you have knowledge, including documents referring or relating to:
  - a. When it was first developed;
  - b. Who developed it;
  - c. Why it was developed;
  - d. In what markets is it used, including but not limited to those markets where these products are no longer being used;
  - e. For each such market, the date on which you first sold it;
  - f. For each such market, the quantities you have sold, by year;
  - g. The cost of producing it;
  - h. All health risks posed by exposure to this alternative.

39. Produce any and all documents referring or relating to the efficacy of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products, including but not limited to documents comparing crops grown with and without these products.
40. Produce any and all marketing plans, strategies, or objectives, or documents discussing marketing plans, strategies, or objectives that refer or relate to the sale of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products.
41. Produce any and all documents that discuss your corporate policy governing the procedures by which a product is researched, developed, tested, and marketed, and specifically all documents which discuss how these procedures were applied to the development of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products.
42. Produce any and all documents that discuss your expenses, costs, budget, and financial reports referring or relating to research and development of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products.
43. Produce any and all documents that discuss your expenses, costs, budget, and financial reports referring or relating to the cost of production of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products.
44. Produce any and all documents relating or referring to your marketing and/or selling of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products in pure or partially-made forms. This request includes, but is not limited to documents depicting the names of the products, who you sold the products to, the quantities sold, when you sold the products, and/or the chemical make-up/composition of the respective product(s) that you marketed and/or sold.
45. Produce any and all contracts of sale between you and any customer regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products.
46. Produce any and all documents relating or referring to any calculations or analyses you made, attempted to make, are in possession of, or are aware of regarding your share of the regional, national, and/or international markets and/or that of other manufacturers, co-ops, and/or wholesalers pertaining to sales of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products.
47. Produce a printout of any database referring or relating to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products that you have developed, manufactured, marketed, supplied, or sold, including databases referring or relating to: (a) their names; (b) the dates during which they were developed, manufactured,

marketed, supplied, or sold; (c) the geographic markets (i.e., country, state, county, city) in which they were developed, manufactured, marketed, supplied, or sold; (d) the name of the entity, business, corporation, or individual who purchased them; and (e) the estimated annual quantity of products sold.

48. Produce any and all advertisements that you have placed regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products in any magazines, newspapers, periodicals, trade journals, catalogues, directories, brochures, circulars, or similar written or printed material.
49. Produce any and all documents and communications regarding your decision to or not to advertise relating to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products.
50. Produce any and all documents that relate to how you have used, marketed, and/or sold atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products after these products were no longer in use in a given location.
51. Produce any and all documents that relate to focus groups or surveys created, issued, organized, funded, led, supervised, contracted, or otherwise provided for by you regarding consumer, governmental, and/or the general public reactions and/or responses to questions and/or comments about potential or actual water contamination and/or health effects caused by atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
52. Produce any and all documents referring or relating to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products being banned or restricted in use by any governmental body or water provider, including copies of the actual orders, statutes, postings, or other documents that banned or restricted the use of the products.
53. Produce any and all documents and/or communications between yourself and any lobbyist regarding or relating to the manufacture, distribution, sale, regulation, registration, labeling, and/or potential legislation of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products.
54. Produce any and all documents and/or communications related to any proposed legislation to limit defendants' liability for contamination by atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
55. Provide any and all documents between yourself and any foreign, U.S. or State politician, regulator, or agency including, but not limited to the U.S. Environmental Protection Agency ("EPA"), regarding or relating to the registration, reregistration, manufacture, distribution, sale, monitoring, banning, restricting, labeling, and setting of maximum contaminant level (MCL) of atrazine, atrazine-containing products, triazines, triazine-containing products,

and/or constituents or degradates of such products, potential legislation or regulations concerning atrazine, and contamination of water resources due to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.

56. Produce any and all documents which mention, concern, or relate to any representations made by you or any industry group of which you were a member to the public or to a state or federal agency relating to atrazine including, but not limited to any benefits or detriments of using atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products in pesticides.
57. Produce any and all documents constituting or relating to any disclosures you made to the EPA, pursuant to the federal Toxic Substances Control Act or otherwise, regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
58. Produce any and all documents constituting or relating to any disclosures made to the EPA, pursuant to the Federal Insecticide, Fungicide and Rodenticide Act or otherwise, regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
59. Produce any and all documents referring or related to Senator Al D'Amato's 1994 proposed amendment to the Safe Drinking Water Act regarding testing for endocrine disruption.
60. Produce any and all documents referring or relating to the July 2, 1987 report to the EPA by Monsanto showing the 1995 results of groundwater screening for atrazine, including copies of the report itself evidencing any notes made by you.
61. Produce any and all documents constituting or relating to any representations made to the EPA that atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products are not drinking water contaminants.
62. Produce any and all documents relating to your involvement with any trade organizations or committees or other groups (whether formal or informal) involved in the development, study, or use of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products, including but not limited to: American Chemical Society (ACS), American Chemical Council (ACC), Synthetic Organic Chemical Manufacturers Association (SOCMA), Crop Life America, American Crop Protection Association, National Agricultural Chemicals Association, Chemical Manufacturers Association, Ecorisk, Center for Regulatory Effectiveness, Chlorine Chemistry Council, Competitive Enterprise Institute, Weed Science Society of America, Illinois Corn Marketing Board, Illinois Corn Growers Association, Indiana Corn Marketing Council, Indiana Corn Growers Association, Iowa Corn Promotion Board, Iowa Corn Growers Association, Kansas Corn Commission, Kansas Corn Growers Association, Kentucky Corn Growers Association, Missouri Corn Merchandising Council, Missouri Corn Growers Association, Nebraska Corn Board, Nebraska Corn Growers Association, North Dakota Corn Growers Association, Ohio

Corn Growers Association, Virginia Grain Producers Association, Wisconsin Corn Growers Association, National Corn Growers Association, Corn Farmers Coalition, and the Triazine Network. This request is meant to include all meeting minutes from all such organizations, committees or groups as well as all communications both internal and to and from other members relating to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.

63. Produce any and all documents which mention, concern or relate to the book "Our Stolen Future," by authors Theo Colborn, Dianne Dumanoski and John Myers, New York, 1996, including documents identifying when and how you became aware of the book and of the authors' opinions, and your knowledge of and/or involvement in the industry's reaction to the book, and any individual's attempts to discredit the authors' opinions.
64. Produce any and all documents which mention, concern or relate to the article "The Economics of Atrazine," by Frank Ackerman, International Journal of Environmental Health, 2007, including documents identifying when and how you became aware of the article and of the author's opinions, your knowledge of and/or involvement in the industry's reaction to the paper, any individual's attempts to discredit the author's opinions, and all copies of this article that evidence notes written by you.
65. Produce any and all documents referring or related to Tyrone Hayes, including but not limited to contracts of employment, work files, employment files, studies that he was involved in or commented on, internal memoranda, and/or communication with him during or after his employment with you regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
66. Produce any and all documents which mention, concern or relate to the following articles authored or coauthored by Tyrone Hayes, including documents identifying when and how you became aware of the papers and of the author's opinions, and your knowledge of and/or involvement in the industry's reaction to the paper, any individual's attempts to discredit the author's opinions, and/or all copies of these articles that evidence notes written by you:
  - a. "Hermaphroditic, Demasculinized Frogs After Exposure to the Herbicide Atrazine at Low Ecologically Relevant Doses," *Proceedings of the National Academy of Sciences of the USA*, April 16, 2002;
  - b. "Feminization of Male Frogs in the Wild," *Nature*, October, 2002;
  - c. "Atrazine-Induced Hermaphroditism at 0.1 ppb in American Leopard Frogs (*Rana pipiens*): Laboratory and Field Evidence," *Environmental Health Perspectives*, April, 2003;
  - d. "A Risk-Based Assessment of Endocrine System Responses in Fish, Amphibians, and Reptiles to Atrazine," *Novartis Crop Protection, Inc., Novartis Number 710-97*, 1997;
  - e. "Atrazine Produces Hermaphrodites in Frogs: Connecting Laboratory and Field Studies," *University of CA, Berkeley*, 2001;
  - f. "Atrazine-Induced Hermaphroditism at 0.1 ppb in American Leopard Frogs (*Rana pipiens*): Laboratory and Field Evidence," *Environmental Health Perspectives*, October 23, 2002;

- g. "There is No Denying This: Defusing the Confusion about Atrazine," *BioScience* 2004 Dec. vol. 54(12) 1138-1149., 2004;
  - h. "Welcome to the Revolution: Integrative Biology and Assessing the Impact of Endocrine Disruptors on Environmental and Public Health," *Integrative and Comparative Biology*, Vol. 45, No. 2, pp. 321-329, 2005;
  - i. "Characterization of Atrazine-Induced Gonadal Malformations in African Clawed Frogs (*Xenopus laevis*) and Comparisons with Affects of an Androgen Antagonist (cyproterone acetate) and Exogenous Estrogen," *Environmental Health Perspectives*, 2006;
  - j. "Pesticide Mixtures, Endocrine Disruption, and Amphibian Declines: Are We Underestimating the Impact," *Environmental Health Perspectives*, 2006;
  - k. "Atrazine-Induced Aromatase Expression is SF-1 Dependent. Implications for Endocrine Disruption in Wildlife and Reproductive Cancers in Humans," *Environmental Health Perspectives*, Vol. 115, No. 5, May 2007;
  - l. "Herbicide Atrazine Activates SF-1 by Direct Affinity and Concomitant Co-activators Recruitments to Induce Aromatase Expression Via Promoter II," *Biochem. Biophysic. Res. Comm.* 355 (2007) 1012-1018, 2007.
67. Produce any and all documents which mention, concern or relate to the article, "The Story of Syngenta & Tyrone Hayes at UC Berkeley: The Price of Research," Goldie Blumenstyk, *The Chronicle of Higher Education* v.50, i.10, October, 2003, including documents identifying when and how you became aware of the paper and of the author's opinions, and your knowledge of and/or involvement in the industry's reaction to the paper, any individual's attempts to discredit the author's opinions, and all copies of this article that evidence notes written by you.
68. Produce any and all documents referring or related to Dawn Forsythe, including but not limited to contracts of employment, work files, employment files, communication with her during or after her employment with you, and/or internal memoranda between you and her or about her regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products. This request includes, but is not limited to, copies and drafts of, and any documents referring or related to the papers/documents mentioned in her interview with Frontline--the "Iowa paper" that she refers to where her "whole section on breast cancer was dropped" and the paper by wildlife biologists regarding endocrine disruptions, including any copies of the papers or drafts evidencing notes by you.
69. Produce any and all documents referring or related to Paul Wotzka and his research, statements, and efforts regarding atrazine contamination in Minnesota.
70. Produce any and all documents referring or related to Daniel M. Byrd, III and/or any other member of Consultants in Toxicology, Risk Assessment and Public Safety (CTRAPS), including but not limited to any correspondence with him/them, any documents evidencing monies, contributions, donations, or fees paid, or any other transfer of value from you to him/them, any contracts entered into with him or them, any reports, proposals, or other

documents he/they submitted on your behalf, any work files and/or studies he/they was/were involved in for you or commented on, and any drafts of any documents prepared by him/them evidencing notes by you regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.

71. Produce any and all documents referring or related to Glen Van der Kraak of the University of Guelph, Guelph, Ontario, including but not limited to any correspondence with him, any documents evidencing monies, contributions, donations, or fees paid, or any other transfer of value from you to him, any contracts entered into with him, any reports, proposals, or other documents he submitted on your behalf, any work files and/or studies he was involved in for you or commented on, and any drafts of any documents prepared by him evidencing notes by you regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
72. Produce any and all documents referring or related to John P. Giesy, including but not limited to any correspondence with him, any documents evidencing monies, contributions, donations, or fees paid, or any other transfer of value from you to him, any contracts entered into with him, any reports, proposals, or other documents he submitted on your behalf, any work files and/or studies he was involved in for you or commented on, and any drafts of any documents prepared by him evidencing notes by you regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
73. Produce any and all documents referring or related to Timothy Pastoor, including but not limited to any correspondence with him, any documents evidencing monies, contributions, donations, or fees paid, or any other transfer of value from you to him, any contracts entered into with him, any reports, proposals, or other documents he submitted on your behalf, any work files and/or studies he was involved in for you or commented on, and any drafts of any documents prepared by him evidencing notes by you regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
74. Produce any and all documents referring or related to Stephen Safe, including but not limited to any correspondence with him, any documents evidencing monies, contributions, donations, or fees paid, or any other transfer of value from you to him, any contracts entered into with him, any reports, proposals, or other documents he submitted on your behalf, any work files and/or studies he was involved in for you or commented on, and any drafts of any documents prepared by him evidencing notes by you regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
75. Produce any and all documents referring or related to Suzanne Williams, including but not limited to contracts of employment and work files that are in your possession regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.



76. Produce any and all documents referring or related to Tim Gross, including but not limited to any correspondence between Tyrone Hayes and him, any other correspondence between you and him, any documents evidencing monies, contributions, donations, or fees paid, or any other transfer of value from you to him, any contracts that you entered into with him, any reports, proposals, or other documents he submitted on your behalf, any work files and/or studies he was involved in for you or Ecorisk or commented on, and any drafts of any documents prepared by him evidencing notes by you regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
77. Produce any and all documents referring or related to Ron Kendall, including but not limited to contracts of employment, work files and/or studies he was involved in for you or Ecorisk or commented on that are in your possession regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
78. Produce any and all documents referring or related to Darcy Kelley, including but not limited to contracts of employment, work files and/or studies Darcy Kelley was involved in for you or Ecorisk or commented on that are in your possession regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
79. Produce any and all documents referring or related to Louis du Preez, including but not limited to any correspondence with him, any documents evidencing monies, contributions, donations, or fees paid, or any other transfer of value from you to him, any contracts entered into with him, any reports, proposals, or other documents he submitted on your behalf, any work files and/or studies he was involved in for you or commented on, and any drafts of any documents prepared by him evidencing notes by you regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
80. Produce any and all documents referring or related to James Carr, including but not limited to any correspondence with him, any documents evidencing monies, contributions, donations, or fees paid, or any other transfer of value from you to him, any contracts entered into with him, any reports, proposals, or other documents he submitted on your behalf, any work files and/or studies he was involved in for you or commented on, and any drafts of any documents prepared by him evidencing notes by you regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
81. Produce any and all documents referring or related to Jay Vroom, Crop Protection Research Institute, or CropLife Foundation, including but not limited to any correspondence with him/them, any documents evidencing monies, contributions, donations, or fees paid, or any other transfer of value from you to him/them, and any contracts entered into with him/them pertaining to atrazine, atrazine-containing products, triazines, triazine-containing products,

and/or constituents or degradates of such products.

82. Produce any and all documents referring or related to Alex Avery and/or the Center for Global Food Issues at Hudson Institute, including but not limited to any correspondence with him/them, any documents evidencing monies, contributions, donations, or fees paid, or any other transfer of value from you to him/them, and any contracts entered into with him/them pertaining to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
83. Produce any and all documents referring or related to Jere White, the Triazine Network, the Kansas Corn Growers Association, the Kansas Grain Producers Association, and/or any other agricultural or farm associations, cooperatives, trade associations, or any other organization that advertises, endorses, supports, or in any way promotes the use of atrazine and/or atrazine-containing products, including but not limited to any correspondence with him/them, any documents evidencing monies, contributions, donations, or fees paid, or any other transfer of value from you to him/them, and any contracts entered into with him/them pertaining to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
84. Produce any and all documents referring or related to your involvement with local and/or national media regarding the present lawsuit, including but not limited to any correspondence with them and/ any press releases issued and/or drafted, and any copies or drafts of such documents evidencing notes by you.
85. Produce any and all documents referring or related to Jim Tozzi and/or the Center for Regulatory Effectiveness, including but not limited to any correspondence with him/them, any documents evidencing monies, contributions, donations, or fees paid, or any other transfer of value from you to him/them, and any contracts entered into with him/them pertaining to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
86. Produce any and all documents which mention, concern, or relate to any of the following articles by Paul MacLennan, *et al.*, including, but not limited to, documents identifying when and how you became aware of the papers and of the authors' opinions, and your knowledge of and/or involvement in the industry's reaction to the paper, and any individual's attempts to discredit the authors' opinions:
  - a. "Cancer Incidence Among Triazine Herbicide Manufacturing Workers," 2002.
  - b. "Mortality Among Triazine Manufacturing Workers," 2003.
  - c. "Mortality Among Workers at Two Triazine Manufacturing Plants," 1996.
  - d. "Review of Epidemiologic Studies of Triazine Herbicides and Cancer," 1997.
87. Produce all documents and/or communications relating to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products from the files of:
  - a. Ackerman, L.;

b.	Alexander, C.;
c.	Arni, P.;
d.	Arthur, A.;
e.	Austin, H.;
f.	Bachmann, M.;
g.	Baker, D.;
h.	Ballantine, L.;
i.	Baranyanie, J.;
j.	Batastini, G.;
k.	Beall, C.;
l.	Bennet, R.;
m.	Brady, J.;
n.	Breckenridge, Charles;
o.	Brill, I.;
p.	Brinkley, C.;
q.	Brusick, D.;
r.	Caballa, S.;
s.	Cassidy, D.;
t.	Ceresa, C.;
u.	Chau, R.;
v.	Cheung, M.;
w.	Chow, E.;
x.	Christensen, B.;
y.	Clarkson, J.;
z.	Cockrell, K.;
aa.	Cole, P.;
bb.	Davidson, IWF;
cc.	DeGeare, M.;
dd.	Delzell, E.;
ee.	Dickson, G.;
ff.	Drake, J.;
gg.	Druschell C.;
hh.	Dunsire, J.;
ii.	Fitzgerald, R.;
jj.	Ford, Sherry;
kk.	Fritz, H.;
ll.	Gass, R.;
mm.	Gersprach, R.;
nn.	Giknis, M.;
oo.	Gilles, P.;
pp.	Gonzalez-Valero, Juan;
qq.	Green, J.D.;
rr.	Hazelette, J.R.;
ss.	Hedley, D.;
tt.	Hofherr, W.;

uu.	Honeycutt, R.;
vv.	Hool, G.;
ww.	Hosmer, Alan;
xx.	Hui, X.;
yy.	Hummel, H.;
zz.	Infurna, R.;
aaa.	Iyer, V.;
bbb.	Jack, L.;
ccc.	Jessup, D.;
ddd.	Johnson, E.;
eee.	Kahrs, R.;
fff.	Katz, R.;
ggg.	Keller, J.;
hhh.	Knight, Frank;
iii.	Kuhn, J.;
jjj.	Langauer, M.;
kkk.	Lobdell, B.;
lll.	Lowe, Kimberly Nesci;
mmm.	Madrid, S.;
nnn.	Maibach, H.;
ooo.	Mainiero, J.;
ppp.	Martin, Duane;
qqq.	Marty, J.;
rrr.	McCormick, G.C.;
sss.	McFarland, Janis;
ttt.	Merritt, Andrew;
uuu.	Metha, C.;
vvv.	Miles, J.;
www.	Morris, Jeffrey;
xxx.	Morseth, S.;
yyy.	Mueller, D.;
zzz.	Murphy, T.;
aaaa.	Newby, L.;
bbbb.	Nichols, M.;
cccc.	O'Connor, DJ;
dddd.	Ogorek, B.;
eeee.	Orr, G.R.;
ffff.	Parish, Thomas;
gggg.	Parshley, Tom;
hhhh.	Paul, H.;
iiii.	Pettersen, J.;
jjjj.	Philips, J.;
kkkk.	Richards, R.;
llll.	Richter, A.;
mmmm.	Rosenheck, L.;

nnnn.	Rossi, Lois;
oooo.	Rudzki, M.;
pppp.	S. Emeigh, Hart;
qqqq.	Sabol, E.;
rrrr.	Sathiakumar, M.;
ssss.	Selman, Frank;
tttt.	Simoneaux, B.;
uuuu.	Slaughter, N.;
vvvv.	Smith, P.
www.	Spickler, Larry;
xxxx.	Spindker, M.;
yyyy.	Stalder, G.;
zzzz.	Stephens, Dr. James;
aaaaa.	Sumner, D.;
bbbbb.	Terranova, P.;
ccccc.	Thakur, A.;
ddddd.	Thede, B.;
eeeee.	Thompson, S.;
fffff.	Tierney C.;
ggggg.	Tierney, Dennis;
hhhhh.	Tompkins, Jim;
iiii.	Turnier, J.;
jjjj.	Wester, R.;
kkkkk.	Wetzel, L.;
llll.	Woodard, G.;
mmmmm.	Woodard, M.;
nnnnn.	Yau, ET;
ooooo.	Yokley, R.;
ppppp.	Youreneff, M.

88. Produce any and all documents referring or related to the following individuals, including but not limited to any correspondence with them, any documents evidencing monies, contributions, donations, or fees paid, or any other transfer of value from you to them, and any contracts entered into with them pertaining to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products:
- Bennet, R.;
  - Breckenridge, Charles;
  - DeGeare, M.;
  - Delzell, E.;
  - Dickson, Gary;
  - Honeycutt, R.;
  - Robert, Bruce;
  - Sathiakumar, M.;
  - Smith, Ernest;
  - Solomon, Keith;

- k. Squire, Dr. Robert;
  - l. Steeger, Thomas;
  - m. Stroker, Tammy.
- 
- 89. Produce any and all documents referring or related to the Ecorisk panel, including but not limited to documents discussing its formation, purpose, goals, marketing to potential members, recruitment of members, communications about and with all members, communications with any political organization, any documents evidencing monies, contributions, donations, or fees paid, or any other transfer of value from you to them, and any contracts entered into with them pertaining to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
  - 90. Produce any and all documents referring or related to the Acetochlor Registration Partnership (ARP), including but not limited to any correspondence with them, any documents evidencing monies, contributions, donations, or fees paid, or any other transfer of value from you to them, and any contracts entered into with them pertaining to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
  - 91. Produce any and all documents relating or referring to atrazine studies, discussions, symposia, meetings held, organized, or performed by the Endocrine Disruptors Group at the University of Missouri-Columbia, including documents referring or related to any and all members of that group.
  - 92. Produce any and all documents referring or related to the Atrazine Monitoring Ecological Effects Workgroup, including but not limited to any correspondence with them, any documents evidencing monies, contributions, donations, or fees paid, or any other transfer of value from you to them, and any contracts entered into with them pertaining to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
  - 93. Produce any and all documents which mention, concern or relate to the article "Triazine Herbicide Exposure and Breast Cancer Incidence: An Ecologic Study of Kentucky Counties," by Michele A. Kettles, et al., Environmental Health Perspectives, Vol. 105, No. 11, November 1997, pp. 1222-1227, including documents identifying when and how you became aware of the article and of the authors' opinions, your knowledge of and/or involvement in the industry's reaction to the paper, any individual's attempts to discredit the authors' opinions, and all copies of this article that evidence notes written by you.
  - 94. Produce any and all documents which mention, concern or relate to the article "Cancer Incidence Among Pesticide Applicators Exposed to Atrazine in Agricultural Health Study," by J.A. Rusiecki, A. De Roos, et al., Journal of the National Cancer Institute 96, 2004, pp 1375-1382, including documents identifying when and how you became aware of the article and of the authors' opinions, your knowledge of and/or involvement in the industry's reaction to the paper, any individual's attempts to discredit the authors' opinions, and all

copies of this article that evidence notes written by you.

95. Produce any and all documents referring or relating to lawsuits and/or consent decree(s) between the EPA and the National Resources Defense Counsel ("NRDC") regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
96. Produce any and all documents and communication which mention, concern or relate to your meetings with EPA in 2004 and/or 2005 that relate or refer to NRDC's lawsuit against the EPA regarding atrazine.
97. Produce any and all documents referring or relating to each person employed or hired by you who has provided testimony (by deposition, trial, hearing, affidavit, or other sworn manner), as well as the testimony itself, in any litigation or administrative proceeding involving contamination of water resources and/or the health effects by/of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
98. Produce any and all documents, including communications, referring or relating to any litigation or administrative proceeding involving contamination of water resources and/or the health effects by/of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
99. Produce any and all documents that relate or refer to the trial and appellate litigation of *Lemaire v. CIBA-GEIGY Corp.*, 99-1809 (La.App. 1 Cir. 6/22/01), 793 So.2d 336, including but not limited to requests for information, documents, witness statements, and/or other information concerning atrazine and responses thereto, communications to and from any of your expert witnesses concerning their testimony or potential testimony in the lawsuits, including requests for information, documents and/or other information concerning plant operations, atrazine distribution, atrazine, and/or the health effects of atrazine.
100. Produce any and all documents referring to, relating to, or constituting insurance policies in which you are a named insured or additional insured and which you claim covers you for the events alleged against you in this action.
101. Produce any and all documents referring or relating to communications between you and any insurer or potential insurer concerning atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
102. Produce any and all documents which referring or relating to risk and/or cost assessments regarding potential third party claims for property and/or water resource(s) contamination as a result of releases of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.

103. Produce any and all records of any citation(s) issued to you by any governmental agency, domestic or foreign, concerning contamination of water resources by atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
104. Produce any and all records of fines or penalties assessed against you by any governmental agency, domestic or foreign, concerning contamination of water resources by atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
105. Produce any and all documents relating to your corporate history, including at a minimum, documents relating to:
  - a. The date of formation or first incorporation;
  - b. The state in you were formed or first incorporated;
  - c. Your present state of incorporation (if different from initial incorporation);
  - d. Any corporate or business name changes;
  - e. Any purchases by or mergers with you of any other business or corporation, and the dates these occurred;
  - f. The states and countries in which you are authorized to do business;
  - g. The name and address of all parent and subsidiary corporations;
  - h. Organizational charts of your present and historical corporate structures; and
  - i. The corporate relationship among all of your parent and subsidiary corporations.
106. Produce any and all documents (such as organizational charts or rosters) identifying your present and historical members of management, including:
  - a. Board of Directors member;
  - b. Chief Executive Officer;
  - c. Chief Financial Officer;
  - d. Director of Marketing, or equivalent, who was responsible for marketing atrazine or atrazine-containing products throughout the United States;
  - e. Director of Marketing, or equivalent, who was responsible for marketing atrazine or atrazine-containing products throughout Illinois;
  - f. Toxicologist, or equivalent, who was responsible for assessing the health risks associated with atrazine;
  - g. Endocrinologist, or equivalent, who was responsible for assessing the health risks associated with atrazine;
  - h. Environmental Health and Safety Manager, or equivalent, who was responsible for environmental, health and safety issues.
107. Produce any and all documents which you identified in, referred to, or relied upon in answering the accompanying set of Interrogatories.
108. Produce your current records retention policies and any prior records retention policies for documents of the type requested in these Requests for Production or inquired about in the accompanying Interrogatories.



109. Produce all versions of each document in your possession listed in Attachment A to this First Requests for Production, including but not limited to any copies that evidence notes or other writings by you, and all documents referring or relating to the documents listed in Attachment A.

Dated: 5/20/09

Respectfully submitted,

BY: Christie Deaton

**KOREIN TILLERY, LLC**

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*Attorneys for the Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true copy of the Plaintiff's First Requests for Production Directed to Defendant Syngenta Crop Protection, Inc. was served upon the attorneys of record for the defendants in this cause by enclosing said copy in an envelope addressed to said attorney at his/her address as disclosed by the pleadings on file in this cause and by depositing said envelope in a U.S. Post Office mailbox at 5:00 p.m. on this 20<sup>th</sup> day of May, 2009.

**KOREIN TILLERY**



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CHRISTINE J. MOODY #6211904

CHRISTIE R. DEATON #6276456

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cc:

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St. Louis, MO 63105

Mark C. Surprenant  
ADAMS & REESE  
4500 One Shell Square  
New Orleans, LA 70139

## Attachment A

Author(s)	Title	Date	Doc Source	Study Number
Ciba-Geigy	Toxizitat an Mausem per os. June 14, 1957. Unpublished.	1957	Ciba-Geigy Corp.	
Alexander C	Letter sent to E. W. Ligon dated 11/25/58 re Toxicity of Atrazine. Unpublished study received Nov. 25, 1958.	1958	Ciba-Geigy Corp.	MRID 00094134
Hazleton Labs	Atrazine C14: Metabolism Study. Report date Jul. 15, 1960. Unpublished.	1960	Hazleton Labs Inc., Palo Alto, CA	
Keller J	Atrazine 50W. Two-year Dietary Administration - Rats. Report date Mar. 10, 1961.	1961	Geigy Agricultural Chemicals. Hazleton Labs, Falls Church, VA	
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Binns W, Johnson A	Chronic and Teratogenic Effects of 2,4-D and Atrazine to Sheep.	1970	Proc N Cent Weed Control Conf 25: 100	
Cassidy D, Caballa S	Metabolism of Atrazine Metabolites in Corn by Goats - Part I Silage. Report date Jun. 9, 1971. Unpublished.	1971	Ciba-Geigy Corp., Greensboro, NC.	Report No. GAAC-71021
Cassidy D, Caballa S	Metabolism of Atrazine Metabolites in Corn by Goats - Part II Grain. Report date Jun. 30, 1971. Unpublished.	1971	Ciba-Geigy Corp., Greensboro, NC.	Report No. GAAC-71021
Cassidy D, Caballa S	Metabolism of Atrazine and its Metabolites in Female Rats.	1971	Ciba-Geigy, Ardsley, NY.	Report No. GAAC-71005A
Ciba-Geigy	Rat reproduction study-test for teratogenic or embryotoxic effects. Oct. 1971.	1971	Ciba-Geigy Corp.	
Drake J	G 28273 (Diaminochlorotriazine): Thirteen-Week Dietary Toxicity Study in Rats. Date Jul. 27, 1971. Unpublished.	1971	Ciba-Geigy Ltd, Switzerland. Lab: Geigy Pharmaceuticals, Wilmslow, UK	Study No. 8/71/S.

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Author(s)	Title	Date	Doc Source	Study Number
Drake J	G 30033 (Desethylatrazine): Thirteen-Week Dietary Toxicity Study in Rats. Date Feb. 2, 1971. Unpublished.	1971	Ciba-Geigy Ltd, Switzerland. Lab: Geigy Pharmaceuticals, Wilmslow, UK	Study No. 2/71/S.L
Fritz H	Rat Segment II Reproduction Study - Test for Teratogenic or Embryotoxic Effects. Report date Oct. 29, 1971.	1971	Ciba-Geigy Ltd, Basle	Expt No. 22710600
Unknown	Atrazine: Metabolism of Atrazine in the Cow.	1971	NA	MRID 404313-46
Fritz H	Reproduction Study - G 30033 (Desethylatrazine). Segment II (Test for Teratogenic or Embryotoxic Effects). Report date Jan. 4, 1972.	1972	Ciba-Geigy Ltd, Basle, Switzerland	Expt No. 22710800
Makhteshim	Determination of the Acute Oral Toxicity of Two Different Samples of Atrazine in Rats. Report date Sept. 4, 1973.	1973	Makhteshim Beer-Sheva Chemical Works, Israel. Lab: Centraal Institute Voor Voedingsonderzoek, Utrechtseweg 48, Ziest, Holland	Report CIVO-TNO 4.9.73 AP
Unknown	Atrazine: Metabolism of 14C-Atrazine in Goat, Sheep and Rat.	1973	NA	MRID 404313-51
Dauterman W	In-vitro metabolism of atrazine by rat liver.	1974	Pestic. Biochem. Physiol. 4:212-219.	
Ciba-Geigy	Acute Oral LD50 of Technical Atrazine in the Mouse. April 7, 1975. Unpublished.	1975	Ciba-Geigy Ltd, Switzerland	Project No. Siss 4569
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Sive R	Report. Oral LD50, Intraperitoneal LD50. Atrazine. Nov. 4, 1976 Unpublished.	1976	Warf Institute Inc., Madison, Wisconsin	Report No. 6080698
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Tisdell M, Harrison D	90-Day Subacute Feeding Study of Atrazine in Rats. Report date July 12, 1977. Unpublished.	1977	Agan Chemical Manufacturers Ltd, Ashdod, Israel. Lab: Warf Institute Inc., Madison, Wisconsin	Study Code T-636
Tisdell M, Harrison D	90-Day Subacute Feeding Study of Atrazine in Dogs. Report date Aug. 2, 1977. Unpublished.	1977	Agan Chemical Manufacturers, Ashdod, Israel. Lab: Warf Institute Inc., Madison, Wisconsin	Study Code T635

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Author(s)	Title	Date	Doc Source	Study Number
Unknown	An Evaluation of the Health Status of Workers at the Ciba-Geigy Corp. Plant at McIntosh, Alabama.	1977	NA	
Ciba-Geigy	In Vitro Microbial Assays for Mutagenicity Testing of Atrazine. Aug. 1979.	1979	Ciba-Geigy Japan, Normura Research Inst. Japan	Project No. NRI-79-2884
Jessup D	2-Year Chronic Oral Toxicity Study in Rats [Terbutym Technical] .	1979	IRDC, MI	Study No. 382-008 MRID 00035923
Kniewald	Effects of S-Triazine Herbicides on Hormone-Receptor Complex Formation, 5 $\alpha$ -Reductase and 3 $\alpha$ -Hydroxysteroid Dehydrogenase Activity at the Anterior Pituitary Level.	1979	Journal of Steroid Biochemistry, 11:833-838, 1979	
Adler I	A Review of the Coordinated Research Effort on the Comparison of Test Systems for the Detection of Mutagenic Affects, Sponsored by the EEC.	1980	Mutation Research, 74:77-93	
Bradway D	Minimizing occupational exposure to pesticides: Recent developments in methodology for monitoring pesticide metabolites in human urine.	1980	Residue Review, Vol. 75 (1980), 51-65	
Jessup D	Two-Year Chronic Oral Toxicity Study in Rats [Propazine Technical].	1980	IRDC, MI	Study No. 382-007 MRID 00041408
Carrere A	Comparison of the Mutagenic Activity of Pesticides In Vitro in Various Short-Term Assays.	1981	Progress in Mutation Research, Vol. II (1981), 87-104	
Hensley J	Aatrex Worker Exposure Study in Sorghum. Unpublished study received Dec. 17, 1981.	1981	Ciba-Geigy Corp.	MRID 00087895 Report No. EIR-81018
Hool G, Mueller D	Dominant Lethal Test - Mouse. Report date Sept. 8, 1981.	1981	Ciba-Geigy Ltd, Basle, Switzerland	Expt No. 801380
Rolofson G	Two-Year Chronic Oral Toxicity Study with GS-14259 Technical in Albino Rats.	1981	Ciba-Geigy Corp., Greensboro, NC	Study No. 622-07993
Slaughter N	Analytical Method Development: Analysis of Atrazine and Terbutryn in Pads, Sweatbands, Gloves, and Polyurethane Plugs; Analysis of Atrazine and Five of its Metabolites in Urine for Worker Exposure Studies. Unpublished study.	1981	Prepared by Rhoads Scientific Co.; submitted by Ciba-Geigy Corp. CDL:247365-D	MRID 0010064 Project No. 1128
Spindler M, Sumner D	Two-Year Chronic Oral Toxicity Study with Technical Atrazine in Albino Rats.	1981	Ciba-Geigy Corp. Lab: Industrial Biotech Labs Inc., N2rthbrook, Illinois	Study No. 622-06769 MRID 00089151

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Author(s)	Title	Date	Doc Source	Study Number
Sumner D	Carcinogenicity Study with Atrazine Technical in Albino Mice. June 30, 1981.	1981	Ciba-Geigy Corp. Lab: Industrial Bio-Test Laboratories Inc., Wedge's Creek Research Farm, & Globe Animal Laboratory Facility, Wisconsin	IBT No. 8580-8906
Sumner D	Validation Report of IBT study no. 622-06769. Audit report date Jan. 30, 1981.	1981	Ciba-Geigy Agricultural Division	IBT Study No. 622-06769
Sumner D	Validation Report of IBT study no. 8580-8906. Audit report date Sept. 1981.	1981	Ciba-Geigy Agricultural Division	IBT Study No. 8580-8906
Dickson G	Letter sent to C. Brinkley dated Apr. 1, 1982: Worker Exposure to Terbutryn through Inhalation. Unpublished study.	1982	Ciba-Geigy Corp.	MRID 00100648
Unknown	Reports of Toxicity Studies Conducted in Response to the EPA Data Call in Notice on Technical Atrazine, Teratology Study in Rats and Rabbits.	1982	NA	MRID 254979
Ciba-Geigy	Dermal absorption of 14C Atrazine by Rats. Ciba-Geigy Corp. May 1983.	1983	Ciba-Geigy Corp.	No. ABR-83005
Ciba-Geigy	Excretion rate of 14c-atrazine from dermally dosed rats. Oct. 1983.	1983	Ciba-Geigy Corp.	Report No. ABR-83081
Gfeller W	Lifetime Carcinogenicity and Chronic Toxicity Study in Rats [Terbutylazine Technical].	1983	Ciba-Geigy Ltd, Basle, Switzerland	Study No. 785196
Gotts R	An Assessment of the Potential Testicular Toxicity of 10 Pesticides Using the Mouse-Sperm Morphology Assay.	1983	Mutation Research, 116 (1983) 407-415	
Unknown	Advanced Product Chemistry Excretion Rate of 14C Atrazine from Dermally Dosed Rats.	1983	NA	No. ABR-83081
Amalgamated Chemicals	Acute Toxicological Study with Atrazine Technical after Oral Application to the Rat. Unpublished.	1984	Pharmatox. GmbH, Germany	Report No. E.H./P 1-4-55-84
Amalgamated Chemicals	Three Months Subacute Toxicity (Feeding) Study in Rat. Published.	1984	Harmatox GmbH, West Germany	Report No. Dr Dickh/P/Re 2-4-58-84
Arthur A, Katz R	Segment II. Teratology Study in New Zealand White Rabbits. Expt. Report date Sept. 18, 1984.	1984	Ciba-Geigy Corp., Greensboro, NJ	Report No. 68-84 MRID 00143006
Infurna R, Arthur A	A Teratology Study of Atrazine Technical in Charles River Rats. Report date Sept. 18, 1984.	1984	Ciba-Geigy Corp., Greensboro, NJ	Report No. 60/84
Ciba-Geigy	Atrazine chronic feeding/oncogenicity study. One-year interim report. May 17, 1985.	1985	Ciba-Geigy Corp.	Path Report No. 7048

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Author(s)	Title	Date	Doc Source	Study Number
Meunch, S	Analytical Results from Surface and Ground Water Monitoring for Selected Herbicides.	1985	Conducted by Monsanto Co.	R.D. No. 691
Murphy T, Simoneaux B	Metabolism of 14C-Atrazine in Orally Dosed Rats. Report date Dec. 6, 1985 Unpublished.	1985	Ciba-Geigy Corp., Greensboro, NC	Report No. ABR-85104
Maria C	Subacute Atrazine Treatment Effects on Rat Renal Functions.	1986	B of Environ Contam and Toxicol, 36: 625-331	
Mayhew D, Taylor G, Smith S, Banas D	Twenty-four Month Combined Chronic Oral Toxicity and Oncogenicity Study in Rats Utilizing Atrazine Technical. Apr. 29, 1986.	1986	Conducted by American Biogenics Corporation for Ciba-Geigy Corp.	Study No. 410-1102
Unknown	Two Year Rat Chronic Feeding and Ongenicity Study of Atrazine.	1986	NA	MRID 262714
Brusick D	An Assessment of the Genetic Toxicity of Atrazine: Relevance to Health and Environmental Effects.	1987	Ciba-Geigy Corp.	
Ciba-Geigy	Atrazine Technical: 2 Generation Reproduction Study in Rats.	1987	NA	MRID 404313-03 Study No. 852063
Ciba-Geigy	Atrazine Technical: 52-Week Oral Feeding in Dogs.	1987	Ciba-Geigy Corp.	Study No. 852008 MRID 404313-01
Ciba-Geigy	Briefing paper on atrazine. Dec. 1986. Analysis of chronic rat feeding study results.	1986	Ciba-Geigy Corp.	
Hazelette J, Green J	Atrazine Technical: 91-Week Oral Carcinogenicity Study in Mice. October 30, 1987.	1987	Ciba-Geigy Corp., Summit, NJ	Study No. 842120 Ref. No. 2-001-26 Toxicol/Path No. 87069 MRID 40431302
Hazelette J, Green J	Combined Chronic Toxicity/Oncogenicity study in Rats [Ametryn Technical].	1987	Ciba-Geigy, NJ	Study No. 842119 MRID 40349906
Kahrs R, Thede B	Study of delta-14C-Atrazine Dose/Response Relationship in the Rat. Report date Oct. 23, 1987. Unpublished.	1987	Ciba-Geigy Corp., Greensboro, NC	Report No. ABR-87087
Madrid S, Nichols M	Distribution and Characterization of Radioactivity of 14C-G 28273 in a Lactating Goat. Report date Oct. 29, 1987. Unpublished.	1987	Ciba-Geigy Corp. Agricultural Division, Vero Beach, Florida.	Study No. M6-101-47A Report No. ABR-87064
Mainiero J, Youreneff M, Giknis M, Yau E	Two-Generation Reproduction Study in Rats. Study completion date Nov. 17, 1987.	1987	Ciba-Geigy Pharmaceuticals Div., Summit, NJ	Study No. 852063 Toxicol/Path No. 87076
Miles J, Orr G	Characterization and Identification of Atrazine Metabolites from Rat Urine. Report date Nov. 17, 1987. Unpublished.	1987	Ciba-Geigy Corp., Greensboro, NC	Report No. ABR-87115



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Author(s)	Title	Date	Doc Source	Study Number
Murphy T, Simoneaux B	Dermal Absorption of 14C Atrazine in the Rat. Date Nov. 6, 1987. Unpublished.	1987	Ciba-Geigy Corp., Greensboro, NC	Report No. ABR-87098 Project No. 101950.
Murphy T, Simoneaux B	Dermal Absorption of 14C Atrazine in the Rat. Unpublished. Date Nov. 6, 1987.	1987	Ciba-Geigy, Greensboro, NC	No. ABR-87098 Project No. 101950
O'Connor D, McCormick G, Green J	Atrazine Technical: Chronic Toxicity Study in Dogs. Study completion date Oct. 27, 1987.	1987	Ciba-Geigy Corp. Agricultural Division, Greensboro, NC. Lab; Ciba-Geigy Pharmaceuticals Division, Summit, NJ	Study No. 852008 Toxicol/Path No. 87048
Orr G, Simoneaux B, Davidson I	Disposition of Atrazine in the Rat. Report date Oct. 23, 1987. Unpublished.	1987	Ciba-Geigy Corp., Greensboro, NC	Report No. ABR 87048
Orr GR	A Summary of the Disposition, Kinetics and Metabolism of Atrazine in the Rat. Date Nov. 17, 1987. Unpublished.	1987	Ciba-Geigy Corp., Greensboro, NC	Study No. ABR-87116
Sabol E	Acute oral toxicity study in rats: 2,4-Diamino-6-chloro-s-triazine. Unpublished report.	1987	Ciba-Geigy Corp, Greensboro, NC. Lab: Stillmeadow Inc., Sugar Land, TX. Submitted to WHO by Ciba-Geigy Ltd., Basle, Switzerland.	Study No. 1290A-79 Study No. 1290B-79 Project No. 5020-87
Unknown	Atrazine Technical: Oncogenicity Study in Mice.	1987	NA	MRID 404313-02
Unknown	Diaminochlorotriazine: Tests for Other Genotoxic Effects Autoradiographic DNA Repair Test on Human Fibroblasts.	1987	NA	MRID 407223-03
Unknown	Nature of Atrazine Metabolism in Poultry and Ruminants.	1987	NA	No. ABR-87112
Ceresa C, Langauer M, Arni P	G30027 Tech. (Atrazine): Micronucleus Test, Mouse. Report date May 31, 1988.	1988	Ciba-Geigy Ltd, Basle, Switzerland	Test No. 871546
Ceresa C, Langauer M, Puri E	Hydroxyatrazine. Structural Chromosomal Aberration Test (Micronucleus Test), Mouse. Study completion date August 31, 1988.	1988	Ciba-Geigy Ltd, Basle, Switzerland	Study No. 871373
Davidson J	Metabolism and Kinetics of Atrazine in Man. Unpublished.	1988	Ciba-Geigy. Bowman Gray School of Medicine, USA.	Project No. 101947
Fitzgerald R	G30027 (Atrazine): 14-Day Oral Toxicity Study in Young Rats (Gavage). Report date Sept. 28, 1988. Unpublished.	1988	Ciba-Geigy Ltd, Basle, Switzerland	GU Project No. 871290
Hazelette J, Green J	Simazine Technical: 95-Week Oral Toxicity/Oncogenicity Study in Mice. April 4, 1988.	1988	Testing Facility: Pharmaceuticals Division, Ciba-Geigy Corp.	MRID No. 40614404 Study No. 842121.

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Author(s)	Title	Date	Doc Source	Study Number
Kuhn J	Atrazine: Acute Oral Toxicity Study ( Mouse). Study completion date July 27, 1991. Unpublished.	1988	Ciba-Geigy Corp, Greensboro, NC. Stillmeadow Inc., Sugar Land, TX	Study No. 5421-88
McCormick G, Arthur	104-Week Chronic Toxicity and Carcinogenicity Study in Rats [Simazine Technical].	1988	Ciba-Geigy, NJ	Study No. 852004 MRID 40614405
O'Connor D, McCormick G, Green J	104-Week Oral Chronic Toxicity and Carcinogenicity study in Rats [Prometon Technical].	1988	Ciba-Geigy, NJ	Study No. 852003 MRID 40488102
Parish T	Comments on the atrazine draft health advisory. A letter from Thomas Parish to USEPA/ODW.	1988	Ciba-Geigy Corp.	Report No. ABR-83005
Pino A	DNA Damage in the Stomach, Kidney, Liver and lungs of Rats Treated with Atrazine.	1988	Mutation Research, 209 (1988) 145-147	
Simoneaux B, Thede B	Comparative Metabolism of Atrazine by Mammalian Tissue Cultures: Preliminary Report. Date May 16, 1988. Unpublished.	1988	Ciba-Geigy Corp., Greensboro, NC	Report No. ABR-88070
Unknown	Hydroxy Atrazine: Gene Mutations Test, Salmonella/Mammalian-Microsome Mutagenicity Test.	1988	NA	MRID 407223-04
Unknown	Hydroxy Atrazine: Tests for Other Genotoxic Effects Autoradiographic DNA Repair Tests on Rat Hepatocytes.	1988	NA	MRID 407223-05
Ballantine L	Estimated Dietary Exposure of Hydroxyatrazine Metabolites to Man. Study completion date Aug. 1989. Unpublished study.	1989	Ciba-Geigy Corp., Greensboro, NC	Study No. ABR-89067
Ciba-Geigy	Submission of Exposure Study in Support of Registration Standard for Atrazine.	1989	Ciba-Geigy Corp.	MRID 41264500
Ciba-Geigy	Acute Oral Toxicity in the Rat. Report date May 17, 1989. Unpublished.	1989	Ciba-Geigy Experimental Toxicology Labs, Stein, Switzerland	Study No. 891047
Delzell E, Druschell C, Iyer V, Cole P	A Follow-up Study of Triazine Herbicide Manufacturing Workers. Study completion date Sept. 15, 1989.	1989	Ciba-Geigy Corp., Greensboro, NC. Lab: University of Alabama at Birmingham, Dept of Epidemiology	
Giknis M	Atrazine Technical. A Teratology (Segment II) Study in Rats. Study completion date Feb. 23, 1989.	1989	Ciba-Geigy Corp., Greensboro, NC	Study No. 882049
Giknis M	Hydroxyatrazine Technical: A Teratology (Segment II) Study in Rats. Study date 2-19 Nov. 1987. Report date Feb. 14, 1989.	1989	Ciba-Geigy, Summit, NJ	Study No. 872202 Path Report No. 88099 Statistics Report 88053

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Author(s)	Title	Date	Doc Source	Study Number
Gojmeric T	Atrazine Biodegradation in Rats: A Model for Mammalian Metabolism.	1989	Bulletin of Environmental Contamination and Toxicology (1989) 43:199-206	
Hummel H, Yourenoff M, Giknis M, Yau E	A Teratology (Segment II) Study in Rats. Report date Aug. 15, 1989.	1989	Ciba-Geigy, Summit, NJ	Study No. 872177
Rudzki M, McCormick C, Arthur A	90-Day Oral Toxicity Study in Rats-Hydroxyatrazine. Report date Oct. 1989. Unpublished.	1989	Ciba-Geigy Corp., Summit, NJ	Study No. 822146
Swallow J, Hazelette J, Arthur A	Diaminochlorotriazine (G 28273): Pilot 4-Week Oral Toxicity Study in Dogs. Completion date May 10, 1989. Unpublished.	1989	Ciba-Geigy Corp., Summit, NJ	Study No. 872148 Toxicol/Path No. 89074
Thompson S, Batastini G, Arthur A	Diaminochlorotriazine (G 28273): Pilot 4-Week Oral Feeding Toxicity Study in Rats. Completion date Oct. 2, 1989. Unpublished.	1989	Ciba-Geigy Corp., Summit, NJ	Study No. 872283 Toxicol/Path No. 89074
Unknown	Diaminochlorotriazine: A Teratology (Segment II) Study in Rats.	1989	NA	MRID 413924-02
Unknown	Hydroxy Atrazine: A Supplement to a Teratology (Segment 2) Study in Rats.	1989	NA	MRID 416864-01
Wetzel L	52 Week Chronic Toxicity Study in Dogs. Study completion date Nov. 6, 1989.	1989	Ciba-Geigy, Summit, NJ	MRID 40431301 Study No. 852008
Chau R, McCormick G, Arthur A	Hydroxyatrazine: 13-Week Feeding Study in Dogs. Study completion date Mar. 20, 1990. Unpublished.	1990	Ciba-Geigy Corp., Summit, NJ	Study No. 892076
Deizell E	Triazines: A Retrospective Follow-up Study of Mortality Among Workers at the Ciba-Geigy Corp. McIntosh Plant. Unpublished study.	1990	University of Alabama	MRID 42637001
Gass R, Stalder G	Atrazine - A Epidemiological Study at the Schweizerhalle Plant. Report date Dec. 1990.	1990	Ciba-Geigy AG, Basle	
Morseth S	14-Day Repeated Dose Oral Toxicity/Hormone Study in Female Albino Rats with Atrazine and Diaminochlorotriazine. Study completion date Mar. 6, 1990. Unpublished.	1990	Ciba-Geigy, Greensboro, NC. Lab: Hazleton Labs, VA	HLA Study No. 483-268
Pommery J	High Performance Liquid Chromatographic Determination of Atrazine in Human Plasma.	1990	Journal of Chromatography, 526 (1990) 569-574	
Thompson S, Batastini G, Arthur A	Diaminochlorotriazine -13/52-Week Oral Toxicity Study in Dogs. Study completion date Jan. 17, 1990.	1990	Ciba Geigy, Summit, NJ	Study No. 872151

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Author(s)	Title	Date	Doc Source	Study Number
Timchalk C, Dryzga M, Langvardt P, Kastl P, Osborne D	Determination of the Effect of Tridiphane on the Pharmacokinetics of 14C-Atrazine following Oral Administration to Male Fischer 344 Rats.	1990	Toxicol 61: 27-40	
Unknown	Chronic Toxicity Study in Rats: Influence of Atrazine Ingestion in Steroid-Receptor Recognition.	1990	NA	MRID 420414-06
Ackerman L	Atrazine Technical: Chronic Toxicity Study in Rats. Pathology Report. Report date 7 May 1988. Amended Report dated Jan. 16, 1991 (with separate summary written by Iversen WO).	1991	Ciba-Geigy Corp., Summit, NJ. Lab: Experimental Pathology Laboratories Inc.	Study No. MIN 852214 Path Report No. 88117
Chau R, McCormick G, Arthur A	104-Week Oral Toxicity/Carcinogenicity Study in Rats [Prometryn Technical].	1991	Ciba-Geigy Corp.	Study No. 872225 MRID 41901201
Gersprach R	G 30033 (Desethylatrazine): Three-Month Oral Toxicity Study in Rats (Administration in Food). Completion date October 22, 1991. Unpublished.	1991	Ciba-Geigy Ltd, Switzerland	Study No. 901264
Kuhn J	Acute Oral Toxicity in Rats (Atrazine Technical). Study completion date March 18, 1991.	1991	Ciba-Geigy Corp, Greensboro, NC. Stillmeadow Inc., Sugar Land, TX	Study No. 7800-91
Kuhn J	DACT Technical: Acute Oral Toxicity Study in Rats. Study completion date March 21, 1991. Unpublished.	1991	Ciba-Geigy Corp, Greensboro, NC. Stillmeadow Inc., Sugar Land, TX	Study No. 7801-91
Kuhn J	G-28279 Technical: Acute Oral Toxicity Study in Rats. Study completion date March 25, 1991. Unpublished.	1991	Ciba-Geigy Corp, Greensboro, NC. Stillmeadow Inc., Sugar Land, TX	Study No. 7803-91
Kuhn J	G-30033 Technical: Acute Oral Toxicity Study in Rats. Study completion date March 22, 1991. Unpublished.	1991	Ciba-Geigy Corp, Greensboro, NC. Stillmeadow Inc., Sugar Land, TX	Study No. 7802-91
Kuhn J	Hydroxyatrazine Technical: Acute Oral Toxicity Study in Rats. Study completion date April 3, 1991.	1991	Ciba-Geigy Corp, Greensboro, NC. Stillmeadow Inc., Sugar Land, TX	Study No. 7983-91
Ogorek B	G 28279 (Desisopropylatrazine) Tech: Micronucleus Test, Mouse. Report date Feb. 23, 1991.	1991	Ciba-Geigy Ltd, Basle, Switzerland	Test No. 901307
Ogorek B	G 30033 (Desethylatrazine) Tech: Micronucleus Test, Mouse. Report date Mar. 25, 1991.	1991	Ciba-Geigy Ltd, Basle, Switzerland	Test No. 901309
Pettersen J, Richter A, Gilles P	Diaminochlorotriazine (G 28273): 90-Day Subchronic Dietary Toxicity Study in Rats. Completion date Nov. 5, 1991. Unpublished.	1991	Ciba-Geigy Corp., Farmington, CT	Study No. F-00006

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Author(s)	Title	Date	Doc Source	Study Number
Raheel M	Pesticide Transmission in Fabrics: Effect of Particulate Soil.	1991	B of Environ Contam and Toxicol (1991) 46:845-851	
Raheel M	Pesticide Transmission in Fabrics: Effect of Perspiration.	1991	B of Environ Contam and Toxicol (1991) 46:837-844	
Rudzki M, McCormick G, Arthur A	Chronic Toxicity Study in Rats. Study completion date Jan. 28, 1991.	1991	Ciba-Geigy Corp., Summit, NJ	Study No. 852214.
Terranova P	90-Day Subchronic Dietary Toxicity Study with G-28273 (diaminochlorotriazine) in Rats: Report Addendum - Effects of G-28273 Technical Administration on Estrous Cycle Parameters in Females Sprague-Dawley Rats. Report addendum. Report date March 27, 1991. Unpublished.	1991	Ciba-Geigy Corp., Greensboro, NC	Study No. F-00006
Thakur A	Determination of Hormone Levels in Sprague-Dawley Rats Treated with Atrazine Technical.	1991	Hazleton Washington, Inc.	Study No. 483-278
Delzell E	Triazines: A Combined Analysis of Mortality Among Workers at the Ciba-Geigy Corp.'s McIntosh and St. Gabriel Plants. Unpublished study.	1992	University of Alabama	MRID 42637002
Marty J	Developmental Toxicity (Teratogenicity) Study in Rats with G 28279 Technical [Desisopropylatrazine] (Oral Administration). Study completion date June 1, 1992.	1992	Ciba-Geigy Ltd, Basle, Switzerland	Test No. 901262
Marty J	Developmental Toxicity (Teratogenicity) Study in Rats with G 30033 Technical (Desethylatrazine). Expt termination date June 5, 1991.	1992	Ciba-Geigy Ltd, Basle, Switzerland	Test No. 901265
Mencoboni, M	Effect of Atrazine on Hemopoietic System	1992	In Vivo, 6:41-44 (1992)	
Rudzki M, Batastini G, Arthur A	G 30033 (Desethylatrazine): 13-Week Feeding Study in Dogs. Study completion date April 16, 1992. Unpublished.	1992	Ciba-Geigy Corp., Summit, NJ	Study No. 902187 Tox/Path No. 91073 (MIN 902187)
Sathiakumar M, Delzell E, Austin H, Cole P	A Follow-up Study of Agricultural Chemical Production Workers.	1992	Dept of Epidemiology, School of Public Health, University of Alabama at Birmingham, USA. Amer J Indust Med 21: 321-330	
Schneider M	G 28279 (Desisopropylatrazine): Three-Month Oral Toxicity Study in Rats (Administration in Food). Completion date May 8, 1992. Unpublished.	1992	Ciba-Geigy Ltd, Switzerland	Study No. 901261

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Author(s)	Title	Date	Doc Source	Study Number
Telang N, Suto A, Wong G, Osborn M, Bradlow H	Review: Induction by Estrogen Metabolite 16-Alpha-hydroxyestrone, of Genotoxic Damage and Aberrant Proliferation in Mouse Mammary Epithelial Cells.	1992	J. Natl Cancer Inst. 84: 634-638	
Thakur A	Oncogenicity Study in Sprague-Dawley Rats with Atrazine Technical. Report date Jan. 27, 1992.	1992	Ciba-Geigy Corp., Greensboro, NC. Lab: Hazleton Washington Inc., Vienna, Virginia	Study No. HLA/HWA-483-275
Thakur A	Two-Year Dietary Oncogenicity Study in Fischer-344 Rats with Atrazine Technical. Report date Feb. 18, 1992.	1992	Ciba-Geigy Corp., Greensboro, NC. Lab: Hazleton Washington Inc., Vienna, Virginia	Study No. HWA-483-277
Thompson S, Batastini G, Arthur A	G-28279 (desisopropylatrazine): 13-Week Feeding Study in Dogs. Study completion date April 22, 1992. Unpublished.	1992	Ciba-Geigy Corp., Summit, NJ	Study No. 912021. Tox/Path No. 91073 (MIN 902187)
Unknown	Effect of Atrazine on Hemopoietic System.	1992	In Vivo, 6(1): 41-4, 1992, Jan-Feb	
Unknown	Metolachlor.	1992	Dangerous Properties of Industrial Materials, 12(2):240-247	
Chaturvedi, A	Biochemical and Toxicological Studies on the Mixtures of 3 Commonly Used Herbicides in Mice.	1993	Arch of Environ Contam and Tox, 24, 449-454 (1993)	
Chow E, Emeigh Hart S	2-Year Dietary Chronic Toxicity/Oncogenicity Study with G-34048 (Hydroxyatrazine) Technical in Rats: Interim Report. Interim report date Jan. 26, 1993.	1993	Ciba-Geigy Corp., Farmington, CT	Study No. F-00125
Eldridge J, Wetzel L, Tisdell M	The Effects of Atrazine on Endocrine Parameters in the Female Sprague-Dawley Rat: A Threshold-Mediated and Strain-Specific Response for Mammary Tumor Development.	1993	NA	
Gass R	Atrazine: An Epidemiological Study at the Schweizerhalle Plant: (Translation from German) Unpublished study.	1993	University of Zurich and University Kantonsspital	MRID 44008602 Project No. 11182
Gass R, Stalder G	Atrazine - A Epidemiological Study at the Schweizerhalle Plant. Report date Jan. 15, 1993.	1993	Ciba-Geigy AG, Basle	
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Lucas A	Determination of Atrazine Metabolites in Human: Development of a Biomarker of Exposure.	1993	Chemical Research and Toxicology, 1993, 6, 107-116	

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Author(s)	Title	Date	Doc Source	Study Number
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Pommery J	Atrazine in Plasma and Tissue Following Atrazine-Amino-Triazole-Ethylene-Glycol Formaldehyde Poisoning.	1993	Clinical Toxicology, 31(2), 323-331 (1993)	
Rosenheck L, Phillips J, Selman F	Worker Mixer/Loader and Applicator Exposure to Atrazine. Study completion date Oct. 14, 1993.	1993	Ciba-Geigy Corp., Greensboro, NC. Trial & Labs: Pan-Agriculture Labs Inc., Medera, CA.	Report No. AE-91-511
Unknown	In Vitro Percutaneous Absorption and Metabolism in Man of 2-Chloro-4-Ethyl-Amino-6-Isopropylamine-S-Triazine (Atrazine).	1993	Archives of Toxicology, 67(2): 85-91, 1993	Study No. H832-11835-01
Bachmann M	G 30027 Tech. (Atrazine): Three-Month Oral Toxicity Study in Rats (Administration in Food). Study completion date Aug. 5, 1994. Unpublished study.	1994	Ciba-Geigy Ltd, Switzerland	Test No. 931063
Baranyani J	Triazine Urine Monitoring. Unpublished study.	1994	Ciba-Geigy Corp.	MRID 43598605
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Jack L	The In Vitro Percutaneous Absorption of Formulated [U14C]Triazine G 30027 (Atrazine) and [U14C]Triazine G 27692 (Simazine) through Human and Rat Abdominal Epidermis. Report date Dec 16, 1994. Unpublished.	1994	Ciba-Geigy Ltd Basle, Switzerland. Lab: Inveresk Research International, Tranent, Scotland	IRI Project No. 154697 Report No. 10702
Austin H	A Critique of a Document Entitled, "Summary: Low Birth Weight in Relation to Source and Characteristics of Drinking Water Supplies in Rural Areas of Iowa" by Peter Isaacson, dated Oct. 1989. Unpublished study.	1995	Ciba-Geigy Corp.	MRID 43598609
Breckenridge C	Response to EPA Review of Retrospective Triazine Mortality Studies. Unpublished study.	1995	Ciba-Geigy Corp.	MRID 43598627
Chow E, Emeigh Hart S	2-Year Dietary Chronic Toxicity/Oncogenicity Study with G-34048 (Hydroxyatrazine) Technical in Rats. Report date Jan. 27, 1995.	1995	Ciba-Geigy Corp., Farmington, CT	Study No. F-00125

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Author(s)	Title	Date	Doc Source	Study Number
Ciba-Geigy	Submission of Toxicity, Fate and Residues in the Environment, and Exposure/Risk to Non-Target Organisms Data in Support of Atrazine and Simazine Special Review PD-1.	1995	Ciba-Geigy Corp.	MRID 43598600
Delzell E	An Evaluation of Epidemiologic Studies of Exposure to Triazines and Cancer in Humans - Triazine. Unpublished study.	1995	Ciba-Geigy Corp.	MRID 43598625
Delzell E	Mortality Among Workers at Two Triazine Herbicide Manufacturing Plants. Unpublished study.	1995	University of Alabama	MRID 43598626
Delzell E, Sathiakumar M	An evaluation of epidemiologic studies on exposure of triazines and cancer in humans.	1995	Ciba Crop Protection, Greensboro, NC	
Delzell E, Sathiakumar M	An updated follow-up study of workers at the Ciba-Geigy McIntosh plant. Final Report. Report date May 20, 1996.	1995	Ciba Crop Protection, Greensboro, NC, University of Alabama School of Public Health.	
Hofherr W	Field Operator Exposure Study. Gesaprim 500FW Herbicide. Mar. 22, 1995.	1995	Ciba-Geigy AG, Basle	Special Study 136/94
Hui X, Wester R, Maibach H	Interim Report: In vivo Percutaneous Absorption of Atrazine in Man. Study completion date Oct. 25, 1995. Unpublished.	1995	Ciba-Geigy Corp., Greensboro, NC	Report No. H832- 11835-01
Hui X, Wester R, Maibach HI	Interim Report: Disposition of Atrazine in Rhesus Monkeys Following Intravenous Administration. Study completion date June 19, 1995. Unpublished.	1995	Ciba-Geigy Corp., Greensboro, NC	Report No. UCSF 95SU04
Petterson J, Turnier J	1-Year Chronic Toxicity Study with Atrazine Technical in Rats. Completion date Dec. 8, 1995.	1995	Ciba-Geigy Corp., Farmington, CT	Study No. F-00171
Richards R, Baker D, Christensen B, Tierney D	Atrazine Exposures Through Drinking Water: Exposure Assessments for Ohio, Illinois and Iowa.	1995	Water Quality Lab., Tiffin, Ohio; Montgomery-Watson Inc., Minnesota; Ciba- Geigy, Greensboro, NC. Environ Sci Technol 29: 406-412	
Selman F	Summary of Assessment of Worker Exposure for Atrazine in Response to the USEPA Issuance of The Triazine Herbicides Position Document 1 Initiation of Special Review. Unpublished study.	1995	Ciba-Geigy Corp.	MRID 43598637 Project No. ABR- 95041



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Author(s)	Title	Date	Doc Source	Study Number
Breckenridge C	Summary of Additional Comments on the Response to the Special Review Position Document 1 for Pesticide Products Containing Atrazine and Simazine: Supplement I: Lab Project Number 2386-108: 6791C: 67991E. Unpublished study.	1996	Ciba-Geigy Corp.	MRID 43934401
Ciba-Geigy	Submission of Toxicology and Exposure/Risk Data in Support of FIFRA 6(a)(2) for Atrazine.	1996	Ciba-Geigy Corp.	MRID 44008600
Ciba-Geigy	Submission of Toxicology, Exposure/Risk, Metabolism, and Residues in the Environment Data in Support of the Special Review for Atrazine and Simazine.	1996	Ciba-Geigy Corp.	MRID 44152100
Clarkson J	Human exposure to atrazine and simazine via ground and surface drinking water: Update 1. Jan. 25, 1996.	1996	Ciba-Geigy Corp.	No. 2852.0480
Delzell E	A Combined Analysis of Mortality Among Workers at Ciba-Geigy Corp.'s McIntosh and St. Gabriel Plants - An Update. Unpublished study.	1996	University of Alabama	MRID 44256502
Delzell E	An Updated Follow-Up Study of Workers at the Ciba-Geigy McIntosh Plant: Final Report. Unpublished study.	1996	University of Alabama	MRID 44256501
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Garry V	Pesticide applicers, biocides, and birth defects in rural Minnesota.	1996	Environ Health Persp 104(4):394-399	MRID 44051901
Honeycutt R, Bennet R, DeGeare M	Evaluation of the Potential Exposure of Workers to Atrazine during Commercial Mixing, Loading and Spray Application to Corn - Biological Field Phase. Report date Jan. 22, 1996.	1996	Ciba-Geigy Corp., Greensboro, NC. Research: HERAC Inc.	No. 95-501HE: 95-517 Ciba Study No. 178-95 MRID 44152111
Morseth S	Evaluation of the Luteinizing Hormone (LH) Surge in Atrazine-Exposed Female Sprague-Dawley Rats. Report date Jan. 25, 1996.	1996	Ciba Crop Protection, Greensboro, NC. Lab: Corning Hazleton Inc., Vienna, Virginia	Study No. CHV 2386-111

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Author(s)	Title	Date	Doc Source	Study Number
Morseth S	Evaluation of the Luteinizing Hormone (LH) Surge in Female Sprague-Dawley Rats - Method Validation. Report date Jan. 18, 1996.	1996	Ciba Crop Protection, Greensboro, NC. Lab: Corning Hazleton Inc., Vienna, Virginia. Lab	Study No. CHV 2386-110
Morseth S	Evaluation of the Luteinizing Hormone (LH) Surge in Female Sprague-Dawley Rats - Pilot Study. Report date Jan. 18, 1996.	1996	Ciba Crop Protection, Greensboro, NC. Lab: Corning Hazleton Inc., Vienna, Virginia. Lab	Study No. CHV 2386-109
Neuberger, J	Atrazine and/or triazine herbicides exposure and cancer: An epidemiologic review	1996	J. of Agromedicine 3(2):9-30.	MRID 44126101
Selman F	An Updated Assessment Study of Worker Exposure for Atrazine in Response to the US Environmental Protection Agency Issuance of the "Triazine Herbicides Position Document 1 Initiation of Special Review": Supplement to ABR-95038 (MRID 43598638): Lab project ABR 96071. Unpublished study.	1996	Ciba-Geigy Corp.	MRID 44152106
Selman F	Assessment of Potential Worker Exposure to Atrazine During Commercial Mixing, Loading, and Application to Corn: Amendment 1: Lab Project Number ABR-95311: 101930: 178-95. Unpublished study.	1996	Novartis Crop Protection, Inc.	MRID 44315403
Selman F	Assessment of Potential Worker Exposure to Atrazine During Commercial Mixing, Loading, and Application to Corn: Interim Report. Unpublished study.	1996	Ciba-Geigy Corp.	MRID 43934418 Project No. ABR-95133: 101930: 178-95
Selman F	Evaluation of the Potential Exposure of Workers to Atrazine During Commercial Mixing, Loading, and Spray Applications in Corn: (Final Report). Unpublished study.	1996	Ciba-Geigy Corp.	MRID 44152109 Project No. ABR-95133: 101930: 178-95
Selman F	Presentation of Data from ABR-95133: "Assessment of Potential Worker Exposure to Atrazine During Commercial Mixing, Loading, and Application to Corn "For Use in the Pesticide Handler's Exposure Database (PHED 1.1). Unpublished study.	1996	Novartis Crop Protection, Inc.	MRID 44315404 Project No. ABR-97068: 101930: 178-95
Selman F	Supplemental Data and Evaluation of Exposure to Lawn Care Operators Using Atrazine in the Southern US: Supplement to ABR-95038: "Assessment of Worker Exposure for Atrazine in Response to the USEPA Issuance of the "Triazines Herbicides Position Document 1 Initiation of Special Review. Unpublished study.	1996	Ciba-Geigy Corp.	MRID 44152108 MRID 43598638 Lab Project Number ABR-96069

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Author(s)	Title	Date	Doc Source	Study Number
Sielken, R	Preliminary Risk Characterization for Atrazine and Simazine: Lab Project Number 56. Unpublished study prepared by Sielken, Inc.	1996	Sielken, Inc.	MRID 43934415
Sielken, R	Risk Characterization for Atrazine and Simazine: Report Supplement: Lab Project number 56. Unpublished study.	1996	Sielken, Inc.	MRID 44152125
Simoneaux B, Brady J, Cheung M, Yokley R	Interim Report: Disposition of Atrazine in Rhesus Monkeys Following Intravenous Administration. Study completion date Jan. 29, 1996 Unpublished.	1996	Ciba-Geigy Corp., Greensboro, NC	Report No. ABR-95131
Smith P	90-Day Subacute Oral Toxicity Study with G 28279 (Desisopropylatrazine) in Albino Rats. Report date Sept. 17, 1971.	1996	Ciba-Geigy Ltd, Switzerland. Lab: Industrial Bio-Test Labs Inc., Northbrook, Ill.	Study No. IBT B9244
Novartis Crop Protection, Inc.	Submission of Toxicology Data in Support of FIFRA 6(a)(2) for Triazine Herbicides (Atrazine & Simazine).	1997	Novartis Crop Protection, Inc.	MRID 44256500
Selman F	Comparison of Exposure Assessments to Atrazine and Simazine for Commercial Operators and Farmers who Mix, Load and/or Apply Atrazine: Unpublished study.	1998	Novartis Crop Protection, Inc.	MRID 44597604 Project No. 542-98: ABR-98068.
Selman F	Evaluation of the Potential Internal Dose of Atrazine to Workers During Mixing, Loading and Application of Atrazine Products - Biological Monitoring. Unpublished study.	1998	Novartis Crop Protection, Inc.	MRID 44597605 Project No. 179-95: ABR-97094
Delzell E	Atrazine: A Follow-up Study of Mortality Among Workers at the Novartis St. Gabriel Plant: Final Report. Unpublished study.	2000	University of Alabama	MRID 45152101
Novartis Crop Protection, Inc.	Submission of Risk Assessment and Exposure Data in Support of the FIFRA 6(a)(2) Requirement for Atrazine.	2000	Novartis Crop Protection, Inc.	MRID 45152100
Brusick D	An Assessment of the Genetic Toxicity of Atrazine: Relevance to Human Health and Environment Effects.	NA	Ciba-Geigy Corp.	
De Serres F	Plants as Detectors of Mutagenic Activity of Herbicides and Their Metabolites.	NA	Environmental Science Research, Vol. 15, Pgs. 106-109	
Naria C	Hepatotoxicity Induced by the Herbicide Atrazine in the Rat.	NA	Toxicology Abstracts, Vol. 11, No. 4, Page 19	
Unknown	Acute Dermal Toxicity Study in Rabbits-CGA-24705/GG-30027.	NA	NA	Study No. 8017-91
Unknown	Acute Oral Toxicity Study in Rats-CGA-24705/G-30027.	NA	NA	Study No. 8016-91

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Author(s)	Title	Date	Doc Source	Study Number
Unknown	Analysis of Human Urine to Determine Residues of Atrazine, G-28273, G-28279, abd G-30033 Resulting from Oral Ingestion of Atrazine Including Storage Stability Results.	NA	NA	Report No. ABR-90034
Unknown	Assessment Study of Worker Exposure for Atrazine in Response to the US EPA Issuance of the Triazine Herbicides Position Document 1 Initiation of Special Review.	NA	NA	Study No. 95038
Unknown	Atrazine (G30027): Toxicology and Safety Assessment.	NA	NA	
Unknown	Final Report. 28-Day Repeated Dose Oral Toxicity Study in Fischer 344 Albino Rats with Atrazine Technical.	NA	NA	
Unknown	Igran Worker Exposure Study in Sorghum.	NA	NA	Report No. EIR-81015