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Attorneys for Respondent New Prime, Inc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

IN THE MATTER OF:	)	
	)	Docket No. RCRA-08-2020-0007
New Prime, Inc.	)	
	)	<b>RESPONDENT'S RESPONSE</b>
Respondent.	)	<b>TO MOTION TO AMEND</b>
	)	<b>COMPLAINANT'S PREHEARING</b>
_____	)	<b>EXCHANGE</b>

Pursuant to 40 C.F.R. § 22.16(b), Respondent New Prime, Inc. submits this Response to Complainant's Motion to Amend Complainant's Prehearing Exchange. Excluding Complainant's Rebuttal Prehearing Exchange, this is Complainant's Second Motion to Amend its Prehearing Exchange. Based on the arguments made in Complainant's brief, Respondent does not oppose Complainant's motion to substitute Kristin McNeill as the penalty witness in this matter.

RESPECTFULLY SUBMITTED this 29th day of April 2022.

MARK RYAN LAW PLLC

A handwritten signature in black ink, appearing to read 'MR', is written over a horizontal line.

Mark A. Ryan  
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## CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of April 2022, I filed Respondent's Response to Complainant's Motion to Amend Complainant's Prehearing Exchange via the OALJ E-filing system and via email to:

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