



JAN 13 2004
FOR THE FINEST IN CLEANERS AND SANITIZERS
P.O. BOX 207 - WASHINGTON, MO. 63090 - (636) 583-4360

January 6, 2004

Rupert G. Thomas
Assistant Regional Counsel
EPA Region 7
901 North 5th St.
Kansas City, Kansas 66101

Dear Mr. Thomas:

This letter constitutes our response to Complaint # FIFRA 07-2004-0041

1.) This product was marketed as a cleaner and made no pesticidal claims, therefore We did not believe that this constituted a FIFRA regulated product and immediately upon the inquiry by your investigator ceased production and sales of this product. As such, we believe the penalties proposed are unfair and excessive.

2.) Our Federal Tax Return for 2002 reports a net operating loss of \$179,000. This is the tenth consecutive year that we have operated at a loss. We currently have a loss carryforward of over one million dollars for our 2003 tax return. We have only managed to remain in business through extensive borrowing. Any unexpected expenditures such as your proposed penalty will adversely effect our ability to continue in business. This constitutes a bona fide issue of ability to pay.

We hereby request an informal settlement conference be arranged at a mutually agreeable date.

Sincerely;

A handwritten signature in cursive script that reads "Raymond E. Kastendieck".

Raymond E. Kastendieck
President