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U.S. EPA REGION IX
REGIONAL HEARING CLERK

Regional Hearing Clerk
USEPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Re: The SoCo Group, Inc. and Floyd Nelson Jr. and Sons, Inc.
Docket No. CAA-09-2007-0029

As instructed in the complaint, this letter will serve as the required "written answer" from The SoCo Group, Inc. ("SoCo") in the subject action. The SoCo Group, Inc. does not contest the General Allegation outlined in Paragraphs 1. through 8.

The SoCo Group, Inc. is not a construction company, and frankly no one in the Company was aware of the 10-day requirement to notify referenced in 40C.F.R. Section 61.145(b)(1)(i). When the Company hires outside contractors to perform various types of professional services, SoCo relies on the particular contractor (in this case Floyd Nelson Jr. and Sons, Inc.) to have the necessary expertise and to know and follow all applicable laws and regulations associated with the services to be performed.

In discussing this matter with Floyd Nelson Jr. and Sons, Inc. it is very clear that neither it nor SoCo intentionally ignored E.P.A. rules; it was simply an honest mistake. Accordingly, SoCo is not requesting a hearing on this matter, or an informal settlement conference. Rather, the Company requests that the E.P.A. Administrator reconsider the proposed \$12,900 civic penalty in light of the fact that the violation was not intentional; it was the result of an innocent oversight, as well as SoCo's unawareness of E.P.A.'s requirement to provide written notice of intention to demolish.

Thank you for the potential reconsideration of this matter.

Sincerely,



Paul P. Olivier
President
The SoCo Group, Inc.

CC: Carol Bussey
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