

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1**

In the Matter of:)	
)	
Howard Gross)	Docket No. TSCA-01-2019-0050
466 Central Avenue, Suite 9)	
Dover, New Hampshire 03820)	
)	
Respondent)	
)	
)	

ANSWER

1. Respondent Admits that the United States Environmental Protection Agency, Region 1 ("EPA"), issued an administrative Complaint and Notice of Opportunity for Hearing. The content of the cited statutes and regulations in Paragraph 1 of the Complaint speak for themselves.

2. Respondent Admits receipt of the Complaint filed and served by EPA. The allegations of EPA as set forth in the Complaint speak for themselves.

3. Admit

4. Admit

5. Admit

6. Admit

7. Admit

8. The content of the cited statute and regulation in Paragraph 8 of the Complaint speak for themselves and thus no answer is required.

9. The content of the cited statute in Paragraph 9 of the Complaint speak for itself and thus no answer is required.

10. The content of the cited statute and regulation in Paragraph 10 of the Complaint speak for themselves and thus no answer is required.

11. Admit

12. Admit

13. Admit, except that Respondent denies that he was aware that one of the tenants was an expectant mother.

14. The allegations of paragraph 14 contain legal conclusions to which no answer is required.

15. The allegations of paragraph 14 contain legal conclusions to which no answer is required.

16. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 16 of the Complaint.

17. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 16 of the Complaint.

18. Respondent admits that EPA came to his Dover, New Hampshire office on March 1, 2019.

19. Admit

20. Respondent repeats and realleges the Answers to paragraphs 1 through 18 of the Complaint.

21. Admit

22. Respondent admits that he did not provide a pamphlet to the lessees identified in the Complaint before they entered a lease for the property.

23. Respondent admits that he did not provide a pamphlet to the lessees identified in the Complaint before they entered a lease for the property.

24. Respondent states that the allegations of paragraph 24 contain a legal conclusion to which no answer is required.

25. Respondent repeats and realleges the Answers to paragraphs 1 through 24 of the Complaint.

26. Admit

27. Deny

28. Respondent repeats and realleges the Answers to paragraphs 1 through 27 of the Complaint.

29. Admit

30. Deny

31. Deny

32. Respondent repeats and realleges the Answers to paragraphs 1 through 31 of the Complaint.

33. Admit

34. Deny

35. Deny

36. Deny

37. Deny

38. Deny

39. Deny

40. Deny

41. Deny

42. The content of the cited regulations in Paragraph 42 of the Complaint speak for themselves and thus no answer is required.

43. Admit

44. The content of the cited statutes and regulations in Paragraph 42 of the Complaint speak for themselves and thus no answer is required.


45. Admit

46. Admit

Respondent requests a hearing in this matter.

Dated: July 30, 2020

Respectfully Submitted,



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In the Matter of Howard Gross, Respondent

Docket No. TSCA-01-2019-0050

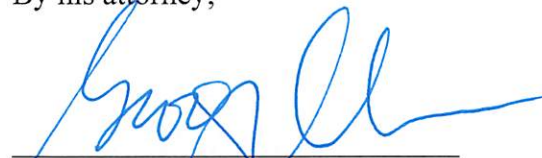
CERTIFICATE OF SERVICE

I hereby certify that, on July 30, 2020, the foregoing Answer was delivered via email to the following addressees:

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HOWARD GROSS,
By his attorney,



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