



11. Paragraphs 49 through Paragraphs 53 of the Complaint are each admitted by the Respondent.

12. Respondent admits the allegation set forth in Paragraph 54 to the extent that EPA made such proposal but denies amount of the penalty in such proposal is proper.

13. Paragraph 55 of the Complaint is denied by the Respondent.

14. Paragraph 56 is admitted by the Respondent.

15. Per paragraph 58, Respondent hereby requests a hearing. Such allegation is admitted by Respondent.

16. Paragraphs 58 through Paragraphs 71 of the Complaint are each admitted by the Respondent.

**For the Respondent, RH Capital-Beets, LLC.:**

Signature: Troy Renkemeyer

Date: 03/05/24

Name: Troy Renkemeyer

Title: Authorized Agent

**Certificate of Service**

I certify that on the date noted below I delivered a true and correct copy of this Answer by electronic mail, to:

Regional Hearing Clerk  
EPA - Region 7  
11201 Renner Boulevard  
Lenexa, Kansas 66219  
*r7\_Hearing\_Clerk\_Filings@epa.gov*

Anna Landis  
Office of Regional Counsel  
U.S. Environmental Protection Agency Region 7  
*landis.anna@epa.gov*

Mark Aaron  
Enforcement and Compliance Assurance Division  
U.S. Environmental Protection Agency Region 7  
*aaron.mark@epa.gov*

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature