

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7
901 N. 5TH STREET
KANSAS CITY, KANSAS 66101

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ENVIRONMENTAL PROTECTION
AGENCY-REGION VII
REGIONAL HEARING CLERK

BEFORE THE ADMINISTRATOR

In the Matter of:)
)
HASSAN ZAYED,) Docket No.: TSCA-07-2006-0238
Wichita, Kansas)
)
Respondent,)
)

ANSWER TO COMPLAINT

COMES NOW, the Respondent, **HASSAN ZAYED**, by and through his attorney, William M. Kehr, and admits and denies the allegations of Plaintiff's Complaint as follows:

1. Respondent admits the allegations contained in Paragraphs 1, 2, 4 & 9 of the Plaintiff's Complaint.
2. Respondent is without sufficient information or knowledge to either admit or deny the balance of the Complaint and therefore generally denies the allegations contained in Paragraphs 3, 5, 7, 8, 10, 11, 12, 13, 17, of the Plaintiff's Complaint.
3. Respondent denies the allegations contained in Paragraphs 6, 14, 15, 16, 18, & 19 of the Plaintiff's Complaint.

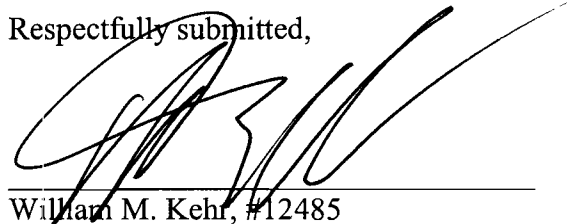
**McFERSON, KEHR
& SEVART**
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111 N. Baltimore
Derby, Kansas 67037
(316) 788-5564
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4. No response is necessary for 20, 21, 22, 23, 24, 25, 26, & 27 of Plaintiff's Petition but if it is deemed required then said paragraphs are denied.

5. Any Paragraph not specifically identified is hereby denied.

WHEREFORE, Respondent respectfully prays that this Court deny Plaintiff's Complaint, and for such other and further relief as the Court deems just and equitable.

Respectfully submitted,



William M. Kehr, #12485

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of August, 2006, a true and correct copy of the above and foregoing Answer to Complaint was **mailed**, to the following:

Original and (1) copy
Regional Hearing Clerk
United States Environmental Protection
Agency
Region 7
901 N. 5th Street
Kansas City, KS 66101

Raymond C. Bosch
Assistant Regional Counsel
U.S. Environmental Protection Agency,
Region 7
901 North 5th Street
Kansas City, KS 66101



William M. Kehr, #12485