

Via E-Mail and First Class Mail

August 22, 2016

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Mailcode ORA 18-1
Boston, MA 02109-3912

Re: **In the Matter of Pike International, et al., Docket No. TSCA-01-2016-0034**

Dear Ms. Santiago:

Enclosed please find Respondents' Answer to Complaint and Request for Hearing with regard to the above-captioned action.

Sincerely,



Peter R. Knight

PRK/see

Enclosure

Copy to: Andrea Simpson, Esq. (EPA)

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I**

In the Matter of)
)
) Docket No. TSCA-01-2016-0034
Pike International, LLC;)
173-175 Park LLC;)
1533 Chapel LLC;)
Quinnipiac Gardens, Inc.;)
H & H Residential LLC;)
FOR LIFE LLC)
287 Norton, LLC;)
325 Fountain, LLC;)
477 Prospect, LLC;)
80 Sherman, LLC.)
)
19 Howe Street, Carriage House)
New Haven, Connecticut 06511)
)
Respondents.)
)
Proceeding under Section 16(a) of)
the Toxic Substances Control Act,)
42 U.S.C. § 2615(a).)

RESPONDENTS' ANSWER TO COMPLAINT AND REQUEST FOR HEARING

NOW COME the above-referenced Respondents, by and through the undersigned counsel, and respectfully answer the Complaint filed in the above-captioned matter, and request a hearing, as follows:

1. Paragraph 1 is introductory in nature and contains no factual statements requiring a response. In further answering, Respondents state that Paragraph 1 states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or

other written document, such document speaks for itself. To the extent that a response is required, Paragraph 1 is denied.

2. Paragraph 2 is introductory in nature and contains no factual statements requiring a response. In further answering, Respondents state that Paragraph 2 states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself. To the extent that a response is required, Respondents admit that they have been notified of the Complaint and all other allegations in Paragraph 2 are denied.

I. STATUTORY AND REGULATORY AUTHORITY

3. Paragraph 3 is an introductory paragraph discussing the statutory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

4. Paragraph 4 is an introductory paragraph discussing the regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

5. Paragraph 5 is an introductory paragraph discussing the regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

6. Paragraph 6 is an introductory paragraph discussing the regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

7. Paragraph 7 is an introductory paragraph discussing the statutory and regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

8. Paragraph 8 is an introductory paragraph discussing the regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

9. Paragraph 9 is an introductory paragraph discussing the statutory and regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

10. Paragraph 10 is an introductory paragraph discussing the statutory and regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

11. Paragraph 11 is an introductory paragraph discussing the statutory and regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no

response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

12. Paragraph 12 is an introductory paragraph discussing the statutory and regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

13. Paragraph 13 is an introductory paragraph discussing the statutory and regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

14. Paragraph 14 is an introductory paragraph discussing the regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

15. Paragraph 15 is an introductory paragraph discussing the regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

16. Paragraph 16 is an introductory paragraph discussing the regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

17. Paragraph 17 is an introductory paragraph discussing the regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

18. Paragraph 18 is an introductory paragraph discussing the regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

19. Paragraph 19 is an introductory paragraph discussing the statutory and regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

20. Paragraph 20 is an introductory paragraph discussing the statutory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

21. Paragraph 21 is an introductory paragraph discussing the statutory and regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

22. Paragraph 22 is an introductory paragraph discussing the statutory and regulatory authority pursuant to which the Complaint is issued and states conclusions of law to which no

response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

II. GENERAL ALLEGATIONS

23. Respondents admit the allegations contained in Paragraph 23 of the Complaint.

24. Respondents admit that at some times relevant to the RRP Rule violations alleged in the Complaint, Pike utilized its own employees or agents to conduct renovation activities in the target housing Pike operates, but deny that Pike exclusively utilized its own employees and agents for such work.

25. Respondents admit the allegations contained in Paragraph 25 of the Complaint.

26. Respondents admit that on or about May 1, 2012, EPA representatives conducted an inspection at Respondent Pike's offices, the purpose of which is known to the EPA.

27. Respondents admit that on or about August 12, 2015, EPA representatives conducted an inspection at Respondent Pike's offices, the purpose of which is known to the EPA.

28. Respondents admit that Sam Hecht, Levi Hecht, Jeff Lashua, and Alan Kaufman were present at various times during the 2015 Inspection. The remainder of the allegations in Paragraph 28 are denied. By way of further answer, Respondents state that Levi Hecht, Jeff Lashua, and Alan Kaufman are no longer employed by Respondents. At the time of the 2015 Inspection, Jeff Lashua was a Property Manager.

29. Respondents admit that they offered apartments for lease in the properties listed in Paragraph 23. The remainder of Paragraph 29 states a conclusion of law to which no response is required.

30. Respondents admit that Respondents offered for lease the apartments identified in Paragraph 30. The remainder of Paragraph 30 states a conclusion of law to which no response is required.

31. Paragraph 31 states conclusions of law to which no response is required.

32. Paragraph 32 states a conclusion of law to which no response is required.

33. Paragraph 33 states a conclusion of law to which no response is required.

34. Paragraph 34 states a conclusion of law to which no response is required.

III. VIOLATIONS

DISCLOSURE RULE VIOLATIONS

35. Paragraph 35 is an introductory paragraph to which no response is required.

COUNT I: FAILURE TO PROVIDE LEAD HAZARD INFORMATION PAMPHLET

36. Respondents repeat and reallege the responses to Paragraphs 1 through 35 above as if fully set forth herein.

37. The allegations contained in Paragraph 37 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

38. Respondents deny the allegations contained in Paragraph 38 of the Complaint. By way of further response, Respondents assert that an EPA-approved pamphlet was provided to some or all of the referenced lessees before such lessees entered into contracts to lease the specified apartments.

39. The allegations contained in Paragraph 39 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute,

regulation, or other written document, such document speaks for itself. To the extent that a response is required, Paragraph 39 is denied.

40. The allegations contained in Paragraph 40 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

**COUNT II: FAILURE TO DISCLOSE THE PRESENCE OF KNOWN
LEAD-BASED PAINT**

41. Respondents repeat and reallege the responses to Paragraphs 1 through 40 above as if fully set forth herein.

42. The allegations contained in Paragraph 42 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

43. Respondents deny the allegations contained in Paragraph 43 of the Complaint. By way of further response, Respondents assert that some or all of the referenced lessees were notified of the presence or possible presence of lead-based paint before such lessees entered into contracts to lease the specified apartments.

44. The allegations contained in Paragraph 44 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself. To the extent that a response is required, Paragraph 44 is denied.

45. The allegations contained in Paragraph 45 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

COUNT III: FAILURE TO INCLUDE LEAD WARNING STATEMENT

46. Respondents repeat and reallege the responses to Paragraphs 1 through 45 above as if fully set forth herein.

47. The allegations contained in Paragraph 47 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

48. Respondents deny the allegations contained in Paragraph 48 of the Complaint. By way of further response, Respondents assert that some or all of the referenced lessees were provided with a Lead Warning Statement before such lessees entered into contracts to lease the specified apartments.

49. The allegations contained in Paragraph 49 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself. To the extent that a response is required, Paragraph 49 is denied.

50. The allegations contained in Paragraph 50 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

**COUNT IV: FAILURE TO DISCLOSE THE PRESENCE OF LEAD-BASED
PAINT/HAZARDS OR LACK OF KNOWLEDGE THEREOF**

51. Respondents repeat and reallege the responses to Paragraphs 1 through 50 above as if fully set forth herein.

52. The allegations contained in Paragraph 52 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

53. Respondents deny the allegations contained in Paragraph 53 of the Complaint. By way of further response, Respondents assert that some or all of the referenced leases included, or were attached to, a statement disclosing the presence of known lead-based paint and/or lead-based paint hazards or a statement indicating no knowledge of the same.

54. The allegations contained in Paragraph 54 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself. To the extent that a response is required, Paragraph 54 is denied.

55. The allegations contained in Paragraph 55 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

COUNT V: FAILURE TO PROVIDE RECORDS OR REPORTS OF LEAD-BASED PAINT/HAZARDS

56. Respondents repeat and reallege the responses to Paragraphs 1 through 55 above as if fully set forth herein.

57. The allegations contained in Paragraph 57 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

58. Respondents deny the allegations contained in Paragraph 58 of the Complaint. By way of further response, Respondents assert that some or all of the referenced leases

included, or were attached to, a list of available records or reports pertaining to lead-based paint and/or lead-based paint hazards or an indication that no such reports were available.

59. The allegations contained in Paragraph 59 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself. To the extent that a response is required, Paragraph 59 is denied.

60. The allegations contained in Paragraph 60 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

**COUNT VI: FAILURE TO INCLUDE AS AN ATTACHMENT OR WITHIN
LEASE SIGNATURES AND DATES FOR LESSORS AND LESSEES**

61. Respondents repeat and reallege the responses to Paragraphs 1 through 60 above as if fully set forth herein.

62. The allegations contained in Paragraph 62 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

63. Respondents deny the allegations contained in Paragraph 63 of the Complaint. By way of further response, Respondents assert that the referenced leases included signatures of the lessor and/or lessees.

64. The allegations contained in Paragraph 64 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself. To the extent that a response is required, Paragraph 64 is denied.

65. The allegations contained in Paragraph 65 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

RENOVATION, REPAIR AND PAINTING RULE VIOLATIONS

66. Paragraph 66 is an introductory paragraph to which no response is required.

COUNT VII: FAILURE TO OBTAIN CERTIFICATION

67. Respondents repeat and reallege the responses to Paragraphs 1 through 66 above as if fully set forth herein.

68. The allegations contained in Paragraph 68 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

69. Respondents admit that certain work was conducted at the Howe Street and Quinnipiac Avenue properties, and deny the remaining allegations contained in paragraph 69 of the Complaint. By way of further response, Respondents assert that to the extent any work was performed in the referenced units, such work constituted minor maintenance and repair activities under 40 C.F.R. § 745.83 and/or was exempt under 40 C.F.R. § 745.82. Respondents further assert that the Howe Street and Quinnipiac Avenue renovations were required due to a sudden, unexpected, non-routine failure of equipment that, if not immediately attended to, presented a safety or public health hazard and threatened significant damage to both Respondents' and resident's property.

70. Respondents admit the allegations contained in Paragraph 70 of the Complaint.

71. Respondents admit the allegations contained in Paragraph 71 of the Complaint.

72. The allegations contained in Paragraph 72 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself. To the extent that a response is required, Paragraph 72 is denied.

73. The allegations contained in Paragraph 73 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

**COUNT VIII: FAILURE TO PROVIDE PRE-RENOVATION EDUCATION
INFORMATION**

74. Respondents repeat and reallege the responses to Paragraphs 1 through 73 above as if fully set forth herein.

75. The allegations contained in Paragraph 75 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

76. Respondents deny the allegations contained in Paragraph 76 of the Complaint. Respondents further assert that the Howe Street and Quinnipiac Avenue renovations were required due to a sudden, unexpected, non-routine failure of equipment that, if not immediately attended to, presented a safety or public health hazard and threatened significant damage to both Respondents' and resident's property.

77. The allegations contained in Paragraph 77 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself. To the extent that a response is required, Paragraph 77 is denied.

78. The allegations contained in Paragraph 78 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

COUNT IX: FAILURE TO ASSIGN A CERTIFIED RENOVATOR

79. Respondents repeat and reallege the responses to Paragraphs 1 through 78 above as if fully set forth herein.

80. The allegations contained in Paragraph 80 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

81. Respondents admit that certain work was conducted at the Howe Street and Quinnipiac Avenue properties and deny the remaining allegations contained in Paragraph 81 of the Complaint. By way of further response, Respondents assert that to the extent any work was performed in the referenced units, such work constituted minor maintenance and repair activities under 40 C.F.R. § 745.83 and/or was exempt under 40 C.F.R. § 745.82. Respondents further assert that the Howe Street and Quinnipiac renovations were required due to a sudden, unexpected, non-routine failure of equipment that, if not immediately attended to, presented a safety or public health hazard and threatened significant damage to both Respondents' and resident's property.

82. The allegations contained in Paragraph 82 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself. To the extent that a response is required, Paragraph 82 is denied.

83. The allegations contained in Paragraph 83 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

COUNT X: FAILURE TO MAINTAIN COMPLIANCE RECORDS

84. Respondents repeat and reallege the responses to Paragraphs 1 through 83 above as if fully set forth herein.

85. The allegations contained in Paragraph 85 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

86. Respondents admit that certain work was conducted at the Howe Street and Quinnipiac Avenue properties and deny the remaining allegations contained in Paragraph 86 of the Complaint. By way of further response, Respondents assert that to the extent any work was performed in the referenced units, such work constituted minor maintenance and repair activities under 40 C.F.R. § 745.83 and/or was exempt under 40 C.F.R. § 745.82. Respondents further assert that the Howe Street and Quinnipiac renovations were required due to a sudden, unexpected, non-routine failure of equipment that, if not immediately attended to, presented a safety or public health hazard and threatened significant damage to both Respondents' and resident's property.

87. The allegations contained in Paragraph 87 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself. To the extent that a response is required, Paragraph 87 is denied.

88. The allegations contained in paragraph 88 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

PROPOSED PENALTY

89. The allegations contained in Paragraph 89 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

90. The allegations contained in Paragraph 90 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

91. The allegations contained in Paragraph 91 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

92. The allegations contained in Paragraph 92 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself. To the extent that a response is required, Paragraph 92 is denied.

93. The allegations contained in Paragraph 93 of the Complaint constitute a legal conclusion to which no response is required, or otherwise are informational.

94. The allegations contained in Paragraph 94 of the Complaint constitute a legal conclusion to which no response is required.

IV. NOTICE OF OPPORTUNITY TO REQUEST A HEARING

95. The allegations contained in Paragraph 95 of the Complaint constitute a legal conclusion to which no response is required, or otherwise are informational. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself. By way of further response, Respondents request a hearing.

96. The allegations contained in Paragraph 96 of the Complaint constitute a legal conclusion to which no response is required, or otherwise are informational. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

97. The allegations contained in Paragraph 97 of the Complaint constitute a legal conclusion to which no response is required, or otherwise are informational. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

V. DEFAULT ORDER

98. The allegations contained in Paragraph 98 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

VI. SETTLEMENT CONFERENCE

99. The allegations contained in Paragraph 99 of the Complaint constitute a legal conclusion to which no response is required, or otherwise are informational. By way of further answer, Respondents state that they have already conferred informally with Complainant, and that they have been and remain willing to pursue reasonable settlement of this matter.

100. The allegations contained in Paragraph 100 of the Complaint constitute a legal conclusion to which no response is required. To the extent that this Paragraph refers to a statute, regulation, or other written document, such document speaks for itself.

VII. DEFENSES AND REQUEST FOR HEARING

101. By way of further answer, Respondents assert that the Complaint was not properly served on the Respondents.

102. By way of further answer, Respondents assert that some or all of the property units named in the Complaint were free of lead-based paint, and some or all of the property units named in the Complaint were free of lead-based paint hazards at all times relevant to the Complaint, and the Complaint fails to state a claim for which relief can be granted and should be dismissed.

103. By way of further answer, Respondents assert that all work on the subject properties was performed in good workmanlike manner in accordance with all necessary statutory and regulatory requirements.

104. By way of further answer, Respondents assert that the claim is barred by laches.

105. By way of further answer, Respondents assert that the proposed penalty is excessive and inappropriate.

106. By way of further answer, Respondents assert that the claim is barred by doctrine of selective enforcement.

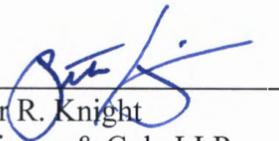
107. By way of further answer, Respondents assert that the claim is barred by equitable estoppel.

108. Respondents respectfully request that the Complaint against them be dismissed, and that judgment be entered for the Respondents, together with its costs.

Respectfully submitted,

Pike International, LLC;
173-175 Park LLC;
1533 Chapel LLC;
Quinnipiac Gardens, Inc.;
H & H Residential LLC;
FOR LIFE LLC
287 Norton, LLC;
325 Fountain, LLC;
477 Prospect, LLC;
80 Sherman, LLC.
19 Howe Street, Carriage House
New Haven, Connecticut 06511

By Their Attorneys,
Robinson & Cole LLP

By: 

Peter R. Knight
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103
Tel: (860) 275-8387
pknight@rc.com

Date: August 22, 2016

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Answer was sent via e-mail and standard mail to the Regional Hearing Clerk's office at the following address:

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Mailcode ORA 18-1
Boston, MA 02109-3912

And that a copy was sent to Complainant by e-mail and standard mail at the following address:

Andrea Simpson, Esq.
EPA Region I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Date: August 22, 2016


Peter R. Knight