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UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY REGIONAL HEARING CLERK

BEFORE THE ADMINISTRATOR

In the Matter of )  
FRM Chem, Inc., ) Docket No. FIFRA-07-2004-0041  
A.k.a Industrial Specialties )  
Respondent )

SUPPLEMENT TO COMPLAINANT'S PRE-HEARING EXCHANGE

COMES NOW the United States Environmental Protection Agency (hereinafter EPA or Complainant), through one of its Attorneys, and pursuant to 40 C.F.R. § 22.19 respectfully submits this supplement to the pre-hearing exchange filed in this matter. Complainant hereby supplements the list of witnesses by adding as an expert witness:

4. Joyce M. Hughes, Accountant, U.S. Environmental Protection Agency, Region VII.

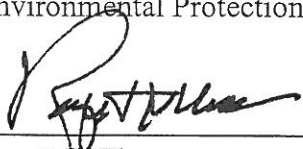
Ms. Hughes is an expert witness who will testify regarding her review and analysis of financial information about FRM Chem, Inc., (hereinafter FRM or Respondent) which includes Income Tax Returns and information submitted to Complainant by Respondent, as well as information independently obtained by Complainant. Ms. Hughes will tender her opinion regarding Respondent's ability to pay the proposed penalty.

Joyce Hughes graduated Magna Cum Laude from Emporia State University with a degree of Bachelor of Science in Business, Accounting Major. Ms. Hughes has 10 years of accounting experience that includes financial analysis/ability-to-pay determinations, cost recovery package certifications, general ledger reconciliations, cost accounting, cash management/account

receivable functions, and small business accounting. Ms. Hughes has 33 years of federal government experience and has worked for several federal agencies.

Respectfully submitted,  
U.S. Environmental Protection Agency

By: \_\_\_\_\_

  
Rupert G. Thomas  
Assistant Regional Counsel  
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ATTORNEY FOR COMPLAINANT

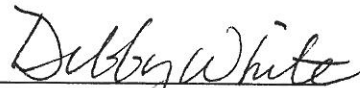
CERTIFICATE OF SERVICE

I hereby certify that on this 15 day of July, 2004, I filed the original and one copy of this Supplement to Complainant's Pre-Hearing Exchange, with the Regional Hearing Clerk, EPA, Region VII, 901 North 5<sup>th</sup> Street, Kansas City, Kansas 66101, and mailed a copy U.S. mail to the following:

Honorable William B. Moran  
United States Administrative Law Judge  
U.S. Environmental Protection Agency  
Mail Code 1900L-Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

and

Mr. Raymond E. Kastendieck  
President, FRM Chem Inc.  
P.O. Box 207  
Washington, Missouri 63090



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Debby White  
Legal Technician