

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 6
DALLAS, TEXAS

FILED

NOV -1 PM 2:16
REGIONAL HEARING CLERK
EPA REGION VI

In the Matter of)
ASAA, Inc.) Docket No. CAA-06-2010-3384
Edmond, Oklahoma)
RESPONDENT) COMPLAINT AND
NOTICE OF OPPORTUNITY
FOR HEARING

ANSWER

This Answer to Complaint and Request for Hearing is filed pursuant to 40 CFR 22.15.
The Respondent, ASAA, Inc. requests a hearing pursuant to 40 CFR 22.15(c).
Respondent, through counsel, Terry D. Kordeliski, II of Riggs, Abney, Neal, Turpen,
Orbison & Lewis states:

1. Respondent admits the text of the cited sections. The remainder of paragraph 1 of Complainant's Complaint are denied.
2. Respondent admits the text of the cited sections. The remainder of paragraph 2 of Complainant's Complaint are denied.
3. Respondent has no knowledge related to the alleged facts in paragraph 3 of Complainant's Complaint and therefore denies the same.
4. Respondent admits the text of the cited sections. The remainder of paragraph 4 of Complainant's Complaint are denied.
5. Respondent admits the text of the cited sections. The remainder of paragraph 5 of Complainant's Complaint are denied.
6. Respondent admits paragraph 6 of Complainant's Complaint.
7. Respondent admits paragraph 7 of Complainant's Complaint.

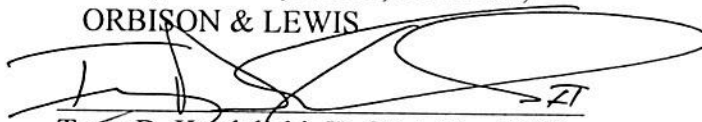
8. Respondent denies paragraph 8 of Complainant's Complaint.
9. Respondent has no knowledge related to the alleged facts in paragraph 9 of Complainant's Complaint and therefore denies the same.
10. Respondent has no knowledge related to the alleged facts in paragraph 10 of Complainant's Complaint and therefore denies the same.
11. Responses to paragraphs 1-10 are realleged and incorporated by reference.
12. Respondent admits the text of the cited sections. The remainder of paragraph 12 of Complainant's Complaint are denied.
13. Respondent admits the text of the cited sections. The remainder of paragraph 13 of Complainant's Complaint are denied.
14. Respondent admits paragraph 14a of Complainant's Complaint. Respondent denies paragraph 14b of Complainant's Complaint.
15. Respondent admits the text of the cited sections. The remainder of paragraph 15 of Complainant's Complaint are denied.
16. Respondent admits paragraph 16 as it relates to 14a of Complainant's Complaint. Respondent denies paragraph 16 as it relates to 14b of Complainant's Complaint.
17. Respondent admits paragraph 17 of Complainant's Complaint.
18. Respondent admits paragraph 18 of Complainant's Complaint.
19. Respondent admits paragraph 19 of Complainant's Complaint.
20. Respondent denies paragraph 20 of Complainant's Complaint.
21. Respondent has no knowledge related to the alleged facts in paragraph 21 of Complainant's Complaint and therefore denies the same.

22. Respondent admits the text of the cited sections. The remainder of paragraph 22 of Complainant's Complaint are denied.
23. Respondent has no knowledge related to the alleged facts in paragraph 23 of Complainant's Complaint and therefore denies the same.
24. Respondent admits the worksheet is attached, but denied its reasonableness or fairness.
25. Respondent admits paragraph 25 of Complainant's Complaint.
26. Respondent admits paragraph 26 of Complainant's Complaint.
27. Respondent admits paragraph 27 of Complainant's Complaint.
28. Respondent admits paragraph 28 of Complainant's Complaint.
29. Respondent admits paragraph 29 of Complainant's Complaint.
30. Respondent admits paragraph 30 of Complainant's Complaint.
31. Respondent admits paragraph 31 of Complainant's Complaint.
32. Respondent admits paragraph 32 of Complainant's Complaint.
33. Respondent admits paragraph 33 of Complainant's Complaint.
34. Respondent admits paragraph 34 of Complainant's Complaint.
35. Respondent requests a hearing.
36. Respondent admits paragraph 36 of Complainant's Complaint.
37. Respondent admits paragraph 37 of Complainant's Complaint.
38. Respondent admits paragraph 38 of Complainant's Complaint.
39. Respondent admits paragraph 39 of Complainant's Complaint.

Respondent, ASAA, Inc., requests a hearing pursuant to 40 CFR 22.15(c). Further, Respondent requests that all relief requested in Complainant's Complaint be denied.

Respectfully submitted,

RIGGS, ABNEY, NEAL, TURPEN,
ORBISON & LEWIS




Terry D. Kordeliski, II, OBA No. 18091
5801 Broadway Extension, Suite 101
Oklahoma City, Oklahoma 73118
Telephone: (405) 843-9909
Facsimile: (405) 842-2913
ATTORNEY FOR RESPONDENT

CERTIFICATE OF SERVICE

This is to certify that on the 29th day of October, 2010, a true and correct copy of the above document was mailed to:

Ms. Angela Hodges (6RC-ER)
U.S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Regional Hearing Clerk
(6RC-D)
U.S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733



Terry D. Kordeliski, II