

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region 2

-----X  
In the Matter of

**Proto Property Services, LLC,**

Respondent.

**ANSWER TO  
COMPLAINT AND  
NOTICE OF  
OPPORTUNITY FOR  
HEARING**

Docket No.  
TSCA-02/2010-9266

Proceeding under Section 16(a) of  
the Toxic Substances Control Act

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Respondents for its answer to the complaint and notice of opportunity for hearing:

1. Requests an informal conference and a hearing on all issues.
2. Admits paragraphs 1, 2, 5, 16 and 21 of the complaint.
3. Denies all other allegations of the complaint.

Dated: New York, New York  
December 6, 2010

U.S. ENVIRONMENTAL  
PROTECTION AGENCY-REG.II  
2010 DEC -9 P 1:37  
REGIONAL HEARING  
CLERK

Yours, etc.,

SIMON, EISENBERG & BAUM, LLP.

*Attorneys for Respondent*

By: 

Robert F. Moraco

A Member of the Firm

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New York, New York 10003

(212) 353-8700

To: Regional Hearing Clerk  
U.S Environmental Protection Agency,  
Region 2  
290 Broadway (16<sup>th</sup> Floor)  
New York, New York 10007-1866

Stuart N. Keith, Assistant Regional Counsel  
U.S. Environmental Protection Agency  
Region 2  
290 Broadway  
New York, New York 10007-1866

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**Region 2**

In the State of  
**Franklin Dugan Services, LLC,**

Respondent.

**ANSWER TO  
COMPLAINT AND  
NOTICE OF  
OPPORTUNITY FOR  
HEARING**

Docket No.  
TSCA-92-0140-9066

Producing under Section 10(a) of  
the Freedom of Information Act.

**ANSWER TO COMPLAINT AND NOTICE OF OPPORTUNITY FOR HEARING**

**SIMON EISENBERG & BARR, LLP**  
**24 UNION SQUARE EAST, FIFTH FLOOR**  
**NEW YORK, NY 10003**  
**TELEPHONE: (212) 353-6700**  
**FACSIMILE: (212) 353-1700**

Signature (Rule 130-1.1-a)



**Robert F. Moran, Esq.**