

BEFORE THE UNITED STATE ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

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In the Matter of: :
: :
Scranton Products Inc. :
801 Corey Street :
Scranton, PA 18505, :
: :
Hoffman and Kozlansky Realty Co., LLC :
300 - A Brook Street : **ADMINISTRATIVE COMPLAINT AND**
Scranton, PA 18505, : **NOTICE OF OPPORTUNITY FOR**
: **HEARING**
and :
: :
Wyoming S & P, Inc :
2143 White Haven Road :
White Haven, PA 18661, :
: :
RESPONDENTS : **DOCKET NO. CAA-3-2008-004**

We hereby submit the following answers concerning the above referenced complaint.

1. Admitted
2. Denied - Conclusion of Law
3. Denied - Conclusion of Law
4. Denied - Conclusion of Law
5. Denied - Conclusion of Law
6. Denied - Conclusion of Law
7. Denied - Conclusion of Law
8. Denied - Conclusion of Law
9. Denied - Conclusion of Law
10. Denied - Conclusion of Law
11. Denied - Conclusion of Law
12. Denied - Conclusion of Law
13. Denied - Conclusion of Law
14. Denied - Conclusion of Law
15. Denied - Conclusion of Law
16. Admitted - (as far as I know)

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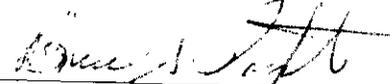
17. Denied - Unknown to for sure
18. Denied - Unknown to me for sure
19. Admitted
20. Admitted - Wyoming S. & P., Inc. was doing asbestos removal in small part on the exterior of the building only; otherwise denied as a conclusion of law and/or ultimate fact
21. Denied - Unknown to me for sure
22. Denied - Unknown to me for sure
23. No response necessary
24. Denied - Conclusion of Law
25. Denied - Conclusion of Law
26. Denied as stated
27. Denied - Unknown to me
28. Denied as stated | Not completely known to me
29. Denied as stated | Not completely known to me
30. Denied as stated | Not completely known to me
31. Denied as stated | not completely known to me
32. Denied as stated | Not completely known to me
33. Denied as stated | Unknown to me
34. Denied - Unknown to me
35. Denied - Unknown to me
36. Denied | Conclusion of Law
37. Denied | Conclusion of Law
38. Denied | Conclusion of Law | Not specifically
39. Denied | Unknown to me as stated
40. Denied | Unknown to me as stated
41. Denied | Unknown to me as stated
42. Denied | Unknown to me | Conclusion of Law

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43. Denied | Unknown to me
44. Denied | Conclusion of Law
45. Denied | Unknown to me
46. Denied | Unknown to me
47. Denied | Unknown to me as stated
48. No Response Necessary
49. Denied | Conclusion of Law
50. Denied | Unknown to me and Conclusion of Law
51. Denied as stated | No response necessary regarding his conclusion.
52. Denied | Conclusion of Law
53. No response needed
54. Denied | Conclusion of Law
55. Denied as stated
56. Denied as stated | conclusion of Law

Therefore, Wyoming S. & P., Inc. requests this complaint be dismissed and defendant be awarded costs and attorney fees if appropriate.

5/1/07
Date:



Bruce S. Postupak, President
Wyoming S & P, Inc.

CERTIFICATE OF SERVICE

I hereby certify that the original and one copy of the forgoing Answer to the Administrative Complaint and Notice of Opportunity for Hearing (re: Docket No. CAA-3-2008-0004) was sent via certified return receipt requested first class-class U.S. Mail to the Regional Hearing Clerk, EPA Region III, and that true and correct copies were mailed via first class U.S. Mail to the following person:

Christopher Hoffman
Hoffman and Kozlansky Realty Co., LLC
300 - A Brook Street
Scranton, PA 18505-1504

John R. Loyack
President and Chief Executive Officer
Scranton Products Inc.
8001 Corey Street
Scranton, PA 18505

Alfred J. Weinschenk, Esq.
Attorney for Scranton Products, Inc.
Oliver Price & Rhodes
Suite 200
1212 South Abington Road
Clarks Summit, PA 18411

Regional Hearing Clerk
U.S. EPA Region III (3RC00)
1650 Arch Street
Philadelphia, PA 19103-2029

Donna L. Mastro (3RC10)
Senior Assistant Regional Counsel
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

11/29/07
DATE



Bruce S. Postapak
President of Wyoming S & P, Inc