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BEFORE THE
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:)	Docket No.
)	CWA-10-2021-0035
)	
Carl Grissom, an Individual,)	
)	ANSWER TO COMPLAINT
West Richland, Washington)	
)	
Respondent.)	
_____)	

ANSWER

Respondent, Carl Grissom, by and through his undersigned attorney, and in Answer to Complaint states:

SECTION III (ALLEGATIONS)

1. Admitted
2. Admitted
3. Admitted
4. Admitted
5. Admitted
6. Respondent lacks knowledge to answer
7. Denied
8. Conclusion or statement of law that does not require a response
9. Admitted

In the Matter of: Carl Grissom
Answer to Complaint
Docket Number: CWA-10-2021-0035
Page 1

10. Respondent lacks knowledge to answer
11. Respondent lacks knowledge to answer
12. Respondent lacks knowledge to answer
13. Respondent lacks knowledge to answer
14. Respondent lacks knowledge to answer
15. Respondent lacks knowledge to answer
16. Respondent lacks knowledge to answer
17. Respondent lacks knowledge to answer
18. Respondent lacks knowledge to answer
19. Respondent lacks knowledge to answer
20. Denied
21. Denied
22. Conclusion or statement of law that does not require a response
23. Denied
24. Denied
25. Denied
26. Denied

PROPOSED CIVIL PENALTY

Respondent hereby requests that the proposed civil penalty be withdrawn.

REQUEST FOR AN INFORMAL SETTLEMENT CONFERENCE

In the event proposed civil penalty is not withdrawn, Respondent hereby requests an informal settlement conference.

REQUEST FOR AN INFORMAL HEARING

Respondent hereby requests a hearing on all issues raised by or subsumed in the Complaint and Answer.



Paul S Bunt, Esq.
Counsel for Carl Grissom