UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 7 BEFORE THE ADMINISRATOR

In the Matter of:

Timothy Wilson, d/b/a Wilson's Pest Control, Docket No. FIFRA-07-2023-0135

Respondent.

RESPONDENT'S PREHEARING EXCHANGE

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Now comes Respondent Timothy Wilson, d/b/a Wilson's Pest Control, by and through his undersigned counsel, and pursuant to the Prehearing Order, submits the following Prehearing Exchange.

List of Witnesses who will or may be called at the hearing

1. Timothy Wilson, Respondent - fact witness

Will testify as to all factual matters set forth in his Answer to the Complaint.

2. Stacey Humphrey - fact witness

Is expected to testify regarding the EPA's alleged attempted inspection of Respondent's Woodson Road facility on July 27, 2023 and related matters, and other contacts by EPA with Respondent

List of Exhibits

<u>RX 1</u>

Statement from Timothy Wilson dated 2/22/2024 regarding submission of EPA Form 3540-16 by Respondent

<u>RX 2</u>

Respondent's EPA Form 3540-16 for Reporting Year 2021

Estimated time needed to present direct case

Respondent expects it can present its direct case in not more than four (4) hours. The services of an interpreter are not needed.

Respectfully submitted,

Raymond

Melvin L. Raymond 4387 Laclede Avenue St. Louis, MO 63108 Telephone: (314) 534-2800 E-mail: mraymondattorney1@att.net

Attorney for Respondent

Date: May 24, 2024

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Prehearing Exchange was sent this day to the following parties in the manner indicated below.

Regnont

Melvin L. Raymond Attorney for Respondent

<u>Copy by OLALJ E-filing System to</u>: U.S. Environmental Protection Agency Office of Administrative Law Judges

<u>Copy by Electronic Mail to</u>: Adam Hilbert Attorney Adviser U.S. Environmental Protection Agency 11201 Renner Blvd. Lenexa, KS 66209 Email: <u>hilbert.adam@epa.gov</u> Co-counsel for Complainant, Environmental Protection Agency, Region 7

Katherine Kacsur Attorney Adviser U.S. Environmental Protection Agency 11201 Renner Blvd. Lenexa, KS 66209 Email: <u>kacsur.katherine@epa.gov</u> Co-counsel for Complainant, Environmental Protection Agency, Region 7

Date: May 24, 2024