

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
BEFORE THE ADMINISTRATOR**

In the Matter of:	)	Docket No.: CAA-03-2021-0058
	)	
Keystone Automotive Operations, Inc.	)	
	)	
<i>Respondent</i>	)	

**RESPONDENT’S PRELIMINARY STATEMENT**

Respondent Keystone Automotive Operations, Inc. (“Keystone”) hereby submits this Preliminary Statement in accordance with the Prehearing Order dated March 31, 2021.

Preference for Location of Hearing. EPA Rules of Practice provide that the hearing will be “held in the county where the respondent resides or conducts the business which the hearing concerns, in the city in which the relevant Environmental Protection Agency Regional Office is located, or in Washington, DC, unless the Presiding Officer determines that there is good cause to hold it at another location or by telephone.” 40 C.F.R. §§ 22.19(d), 22.21(d). Keystone’s preference is that the hearing be held in Luzerne County, Pennsylvania, which is the location of Keystone’s headquarters and will be most convenient for its anticipated witnesses.

Consent to Electronic Service and Email Address for Service. Keystone consents to service of orders and decisions issued by this Tribunal, and to service of documents filed by other parties, by email only during this proceeding. Keystone will accept service at the following email address: [jennifer.adams@hoganlovells.com](mailto:jennifer.adams@hoganlovells.com)

Dated: April 23, 2021

Respectfully submitted:

Jennifer P.  
Adams

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Date: 2021.04.23 10:25:31  
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**CERTIFICATE OF SERVICE**

I, Hannah Graae, hereby certify that on this 23<sup>rd</sup> day of April 2021, I have served a true and correct copy of Respondent's Preliminary Statement to the following parties in the manner indicated below.

Original and one copy via the OALJ Electronic Filing System to:

Mary Angeles, Headquarters Hearing Clerk  
U.S. Environmental Protection Agency  
Office of Administrative Law Judges  
Ronald Reagan Building, Room M1200  
1300 Pennsylvania Ave., NW  
Washington, DC 20004

One copy via the OALJ Electronic Filing System to:

Susan L. Biro, Chief Administrative Law Judge  
U.S. Environmental Protection Agency  
Office of Administrative Law Judges  
Ronald Reagan Building, Room M1200  
1300 Pennsylvania Ave., NW  
Washington, DC 20004

Copy by Electronic Mail to:

Jennifer M. Abramson  
Senior Assistant Regional Counsel  
U.S. Environmental Protection Agency, Region 3  
Email: [abramson.jennifer@epa.gov](mailto:abramson.jennifer@epa.gov)  
*Counsel for Complainant*

Hannah  
Graae

Digitally signed by  
Hannah Graae  
Date: 2021.04.23  
10:26:08 -05'00'

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Hannah Graae