

UNITED STATES ENVIRONMENTAL PROTECTION AGENGRARING CLERK REGION 7 11201 RENNER BOULEVARD LENEXA, KANSAS 66219

BEFORE THE ADMINISTRATOR

In the Matter of	
) Docket No. CWA-07-2023-0067
RH Capital-Beets, LLC.,)
1 , , ,	RESPONDENT'S ANSWER TO
Respondent	COMPLAINT AND REQUEST FOR
1	HEARING
Proceedings under Section)
311(b)(6)(B)(ii) of the Clean Water)
Act, 33 U.S.C. § 1321(b)(6)(B)(ii)	
111, 22 2.2.2. § 1221(0)(0)(2)(11))

RESPONDENT HEREBY REQUESTS A HEARING AS SET FORTH IN SECTION VII OF THE COMPLAINT

- 1. Paragraphs 1 through 27 of the Complaint are each admitted by the Respondent.
- 2. Paragraph 28 of the Complaint is denied by the Respondent.
- 3. Paragraphs 29 through Paragraphs 33 of the Complaint are each admitted by the Respondent.
 - 4. Paragraphs 34 and 35 of the Complaint is denied by the Respondent.
 - 5. Paragraphs 36 through 38 of the Complaint are each admitted by the Respondent.
 - 6. Paragraph 39 of the Complaint is denied by the Respondent.
- 7. Respondent has no knowledge of the allegations made in Paragraphs 40 through 41 and therefore denies such allegations.
 - 8. Paragraph 42 of the Complaint is denied by Respondent.
 - 9. Paragraphs 43 through 45 of the Complaint are each admitted by the Respondent.
- 10. Respondent has no knowledge of the allegations made in Paragraphs 46 through 48 and therefore denies such allegations.

*In the Matter of RH Capital-Beets, LLC.*Docket No. CWA-07-2023-00678

- 11. Paragraphs 49 through Paragraphs 53 of the Complaint are each admitted by the Respondent.
- 12. Respondent admits the allegation set forth in Paragraph 54 to the extent that EPA made such proposal but denies amount of the penalty in such proposal is proper.
 - 13. Paragraph 55 of the Complaint is denied by the Respondent.
 - 14. Paragraph 56 is admitted by the Respondent.
- 15. Per paragraph 58, Respondent hereby requests a hearing. Such allegation is admitted by Respondent.
- 16. Paragraphs 58 through Paragraphs 71 of the Complaint are each admitted by the Respondent.

For the Respondent, RH Capital-Beets, LLC.:

Signature:	Troy Renkemeyer	Date:	03/05/24
Name:	Troy Renkemeyer	Title:	Authorized Agent

Certificate of Service

I certify that on the date noted below I delivered a true and correct copy of this Answer by electronic mail, to:

Regional Hearing Clerk EPA - Region 7 11201 Renner Boulevard Lenexa, Kansas 66219 r7_Hearing_Clerk_Filings@epa.gov

Anna Landis Office of Regional Counsel U.S. Environmental Protection Agency Region 7 landis.anna@epa.gov

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Date	Signature