

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

In the Matter of:)	COMPLAINANT’S MOTION TO SUPPLEMENT COMPLAINANT’S PREHEARING EXCHANGE
)	
ADAMAS CONSTRUCTION AND DEVELOPMENT SERVICES, PLLC)	
)	
AND)	
)	
NATHAN PIERCE,)	
)	
Respondents.)	Docket No. CWA-07-2019-0262
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MOTION TO SUPPLEMENT COMPLAINANT’S PREHEARING EXCHANGE

COMES NOW, the U.S. Environmental Protection Agency, Region 7 (“EPA” or “Complainant”), through its undersigned counsel, to respectfully provide Complainant’s Motion to Supplement Complainant’s Prehearing Exchange.

1. On November 26, 2019, Complainant filed Complainant’s Initial Prehearing Exchange.
2. On January 27, 2020, Respondent filed Respondents’ Prehearing Exchange.
3. On April 3, 2020, Complainant filed Complainant’s Rebuttal Prehearing Exchange.
4. On June 24, 2022, Complainant filed a Supplemental Prehearing Exchange.
5. Pursuant to 40 C.F.R. § 22.19(f), a party who has made an information exchange under paragraph (a) of this section, or who has exchanged information in response to a request for information or a discovery order pursuant to paragraph (e) of this section, shall promptly supplement or correct the exchange when the party learns that the information exchanged or response provided is incomplete, inaccurate or outdated, and the additional or corrective information has not otherwise been disclosed to the other party pursuant to this section.

6. Complainant requests that this Court allow Complainant to admit as part of its prehearing exchange the Lane Deer Wastewater Treatment Facility's National Pollutant Discharge Elimination System ("NPDES") permit, hereby attached as CX58.
7. Complainant notified Respondents of this Motion on July 19, 2022 via phone call.
Respondents does not object to this Motion.

Respectfully submitted this 22 day of July 2022.

Katherine Kacsur
Assistant Regional Counsel
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Lenexa, KS 66209
(913) 551-7734
email: kacsur.katherine@epa.gov

In the Matter of *Adamas Construction and Development Services, PLLC and Nathan Pierce*,
Respondents.
Docket No. CWA-07-2019-0262

CERTIFICATE OF SERVICE

I certify that the foregoing Complainant's Motion to Supplement Complainant's Prehearing Exchange, Docket No. CWA-07-2019-0262, has been submitted electronically using the OALJ E-Filing System.

A copy was sent by email to Nathan Pierce, Owner, Adamas Construction and Development Services PLLC:

Nathan Pierce
Email: adamas.mt.406@gmail.com

Date: July 22, 2022

Respectfully Submitted,

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