

ATTACHMENT A

BEFORE THE
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

Dave Erlanson, Sr., Individual,

Swan Valley, Idaho,

Respondent.

DOCKET NO. CWA-10-2016-0109

**REQUESTS FOR INFORMATION AND
REQUESTS FOR PRODUCTION**

Pursuant to 40 C.F.R. § 22.19(e), Complainant Environmental Protection Agency (“EPA” or “Complainant”) requests that Respondent Dave Erlanson, Sr. (“Respondent”) respond to the Requests for Information and Requests for Production set forth below. Provide a separate and complete answer to each question, and number each answer with the number of the request to which it responds. In response to each request for the production of documents, produce the originals or clear, readable copies of the documents listed below. “Documents” means all information in any reproducible form, including, but not limited to, writings, graphs, charts, photographs, tapes, computer disks, and other data compilations from which information can be obtained. If you fail to provide information or documents within your control, the Presiding Officer may, in her discretion: “(1) Infer that the information would be adverse to the party failing to provide it; (2) Exclude the information from evidence; or (3) Issue a default order under § 22.17(c).” 40 C.F.R. § 22.19(g).

Request for Information No. 1: Estimate the amount of gold, or other metal, that you removed from the South Fork Clearwater River on July 22, 2015. In your response, separately identify the amount of each type of metal removed.

Request for Production No. 1: Produce any documents related to the amount of gold, or other metal, that you removed from the South Fork Clearwater River on July 22, 2015.

Request for Information No. 2: Estimate the dollar value of the gold, or other metal, that you removed from the South Fork Clearwater River on July 22, 2015. In your response, separately identify the value of each type of metal removed.

Request for Production No. 2: Produce any documents related to the dollar value of the gold, or other metal, that you removed from the South Fork Clearwater River on July 22, 2015.

Request for Information No. 3: Clarify whether you claim an inability to pay the proposed penalty in the amount of \$6,600.

Request for Production No. 3: If you claim an inability to pay the proposed penalty, produce any documents that support your claim.