

HPI Products, Inc.
222 Sylvania Street
P.O. Box 997
St. Joseph, MO 64502-0997
816-233-1237

2013 AUG -1 AM 10:13

July 10, 2013

Robert W. Richards, Attorney
EPA Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

via: Mail and email (Richard.Robert@EPA.gov)

Re: Administrative Complaint FIFRA-07-2013-0015

Mr. Richards,

We are writing today to request a Settlement Conference. We understand that an informal settlement conference does not extend the 30 day period during which a written answer and request for a hearing must be submitted. We received your notice on June 28, 2013.

We would like to discuss "whether or not the alleged violations occurred" and "the appropriateness of the proposed penalty".

It is our position that the 8 (eight) counts should be reduced to 1 (one) count because the uniqueness of the counts is dependant on dates of bills of lading. HPI Products does not deny that it packaged and labeled containers of Clethodim 2EC some of which contained dicamba. However HPI Products did not ship the material. It was shipped by the registrant J. Oliver.

Please contact me at your earliest convenience to set up a time for a conference.

Sincerely,



William E. Garvey
President