From: Stanfield, Brooks
To: Paramjit Hothi
Subject: RE: Information Request - Spokane Recycling Co LLC - sent February 10, 2020
Date: Monday, March 02, 2020 1:02:00 PM

OK. I've let my attorney know. Thanks Parm.

Brooks Stanfield
Federal On-Scene Coordinator
U.S. EPA Region 10
1200 Sixth Ave. Suite 155, 13-J07
Seattle WA 98101-3140
stanfield.brooks@epa.gov

(o) 206-553-4423
(c) 206-379-2996

From: Paramjit Hothi <diamond.eleven@hotmail.com>
Sent: Monday, March 02, 2020 12:26 PM
To: Stanfield, Brooks <Stanfield.Brooks@epa.gov>
Subject: Re: Information Request - Spokane Recycling Co LLC - sent February 10, 2020

Hi Brooks,

I wanted to let you know that we will have Doug Byrd attending with us at our meeting scheduled for March 3 at 1pm.

Doug Byrd

Designated Broker

509-326-8080 Direct

509-216-6575 Cell

Also, just to update you that we do not have a lawyer assigned to this issue yet.

Any issues, please let me know.

Regards,
Parm

From: Stanfield, Brooks <Stanfield.Brooks@epa.gov>
Sent: February 18, 2020 4:55 PM
To: Diamond11 <diamond.eleven@hotmail.com>
Cc: Leefers, Kristin <Leefers.Kristin@epa.gov>
Subject: RE: Information Request - Spokane Recycling Co LLC - sent February 10, 2020

Hi Parm-

We have reserved a meeting room here at our office from 1pm to 3pm on Tuesday March 3rd. We will expect you, your wife (if she is also available then) and your attorney, if you're able to get them on board in time.

Our address is:
1200 Sixth Ave.
Seattle WA 98101-3140

Our office entrance is on the southeast corner of 6th Ave and University Street in downtown Seattle. As you walk in, you will walk toward the security desk and through a security check (metal detector, etc.). There is a reception area and a person at a reception desk on the other side of the security check. If I am not in the reception area waiting for you once you pass through security, you can tell the receptionist that you're there to see me and they will call me. Once you're signed in, we will go upstairs to our meeting room.

Let me know if we can expect your attorney. Thanks for working with us.

-Brooks

From: Diamond11 <diamond.eleven@hotmail.com>
Sent: Tuesday, February 18, 2020 3:34 PM
To: Stanfield, Brooks <Stanfield.Brooks@epa.gov>
Subject: Re: Information Request - Spokane Recycling Co LLC - sent February 10, 2020

Hi brooks, we are open to your proposal and want to help in any way we can. March 3 sounds best option for me.

Thanks for your quick response.
Parm

Sent from my iPhone

On Feb 18, 2020, at 2:30 PM, Stanfield, Brooks <Stanfield.Brooks@epa.gov> wrote:

Parm-
We are aware of the setback you've had securing legal counsel. I just spoke with Kris about your offer. She and I have a new proposal that we look to the week of March 2nd. We've identified two options that would work that week: Tuesday 3/3 or Thursday 3/5. Both days we can be available between 12pm and 3pm. If you don't have an attorney secured by then, Kris says she can provide you information about our legal process just to get the ball rolling.

Once we firm this up, I'll provide some instructions for entering our building and getting through security and those kind of details.

Let me know if our new proposal would work for you and you have preference of date.

Brooks Stanfield
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<image001.jpg>

From: Paramjit Hothi <diamond.eleven@hotmail.com>
Sent: Tuesday, February 18, 2020 12:06 PM
To: Stanfield, Brooks <Stanfield.Brooks@epa.gov>
Subject: Re: Information Request - Spokane Recycling Co LLC - sent February 10, 2020

Hi Brooks,

I was thinking we could meet in person at your offices and it would be myself and my wife who would attend , so we would not have any lawyer with us and this would therefore be a conversation to get some general questions answered so that we would be more prepared to get the right lawyer. I am thinking it will take me about 1.5-2 weeks to get another lawyer secured for this issue.

I could attend at your offices for 11am on February 20, but if this is not suitable, please let me know which day is.

My apologies for the delay in getting back to you.

Regards,
parm

From: Stanfield, Brooks <Stanfield.Brooks@epa.gov>
Sent: February 14, 2020 1:07 PM
To: Diamond11 <diamond.eleven@hotmail.com>
Subject: RE: Information Request - Spokane Recycling Co LLC - sent February 10, 2020

Thanks Parm. My attorney let me know about the setback with the attorney. We're standing by.

Brooks Stanfield
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From: Diamond11 <diamond.eleven@hotmail.com>
Sent: Friday, February 14, 2020 12:32 PM
To: Stanfield, Brooks <Stanfield.Brooks@epa.gov>
Subject: Re: Information Request - Spokane Recycling Co LLC - sent February 10, 2020

Hi Brooks, I will let you know ASAP about meeting either in person or phone call as we are in a bit of a bind bec as you know Tom can't represent us. I will be in touch as soon as I figure this out.

Parm

Sent from my iPhone

On Feb 14, 2020, at 8:58 AM, Stanfield, Brooks

<Stanfield.Brooks@epa.gov> wrote:

Thank you.

Brooks

From: Paramjit Hothi <diamond.eleven@hotmail.com>
Sent: Thursday, February 13, 2020 9:49 PM
To: Stanfield, Brooks <Stanfield.Brooks@epa.gov>
Subject: Re: Information Request - Spokane Recycling Co LLC - sent February 10, 2020

password is (b) (6)

From: Stanfield, Brooks <Stanfield.Brooks@epa.gov>
Sent: February 13, 2020 12:20 PM
To: Paramjit Hothi <diamond.eleven@hotmail.com>
Subject: RE: Information Request - Spokane Recycling Co LLC - sent February 10, 2020

Thank you Parm. This document appears to be password protected. We will either need that password or need another document that is not password protected to access the information.

Brooks Stanfield
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stanfield.brooks@epa.gov

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(c) 206-379-2996

From: Paramjit Hothi <diamond.eleven@hotmail.com>
Sent: Wednesday, February 12, 2020 8:23 PM

To: Stanfield, Brooks <Stanfield.Brooks@epa.gov>
Subject: Re: Information Request - Spokane Recycling Co LLC - sent February 10, 2020

Hi Brooks,

Sorry about that. Please find attached the 2018 tax return for Spokane Recycling LLC.

Any questions, please let me know.

Parm

From: Stanfield, Brooks <Stanfield.Brooks@epa.gov>
Sent: February 11, 2020 1:18 PM
To: Paramjit Hothi <diamond.eleven@hotmail.com>
Subject: RE: Information Request - Spokane Recycling Co LLC - sent February 10, 2020

Parm-
We've discovered that the tax return provided for 2018 is your personal tax return and not that of Spokane Recycling LLC. We were wondering if there was a mix up. If you could check and see if the return for the LLC is available, we'd appreciate it.

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(c) 206-379-2996

From: Paramjit Hothi <diamond.eleven@hotmail.com>
Sent: Monday, February 10, 2020 8:49 PM
To: Stanfield, Brooks <Stanfield.Brooks@epa.gov>

Subject: Information Request - Spokane Recycling Co LLC - sent February 10, 2020

Hi Brooks,

Please find attached all the documentation regarding the tax returns from our accountant.

Please find attached all transaction history of payments made to Avista.

I would like to schedule a conference call with you if possible for sometime next week if that is ok with you. Please let me know if you would agree to this.

Regards,
Parm

From: Stanfield, Brooks <Stanfield.Brooks@epa.gov>
Sent: January 27, 2020 2:09 PM
To: 'Paramjit Hothi' <diamond.eleven@hotmail.com>
Subject: RE: Information Request - Request for Extension

Hi Parm-
Yes. What you can tell your account we're looking for is highlighted under number 4 of the information request letter we sent on October 1. I've reattached that letter and copied in the verbiage from that section below my signature for your convenience. I believe that getting the federal tax returns (as the first item requested in 4.a.) is simple and covers a lot of the information needed, but the more information you can provide here, the better it is for your company.

Let me know if your accountant has any questions.

Brooks Stanfield
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4. Financial Information

a. Provide true and complete copies of all federal income tax documents, including all supporting schedules, for 2014, 2015, 2016, 2017 and 2018. Provide the federal Tax Identification Number. If documentation is not available, fill out the enclosed IRS Form 8821 to provide EPA with direct access to this documentation from the U.S. Internal Revenue Service.

b. Complete the enclosed EPA Financial Statement for Businesses Form or provide an audited financial statement that contains all of the information requested in the form.

c. Provide the Respondent's financial interest in, control of, or that the Respondent is a beneficiary of any assets (in the U.S. or in another country) that have not been identified in your federal tax returns or other financial information to be presented to EPA. If there are such assets, identify each asset by type of asset, estimated value, and location.

d. Provide a full copy of the Respondent's asset depreciation schedule for the most recent fiscal year.

e. Provide copies of the Respondent's five most recent years of audited financial statements, including auditor's opinion, balance sheet, income statement, statement of cash flows and supporting notes and schedules. If audited statements are not available, please submit unaudited financial statements, including balance sheet, income statement, statement of cash flows and supporting notes and schedules.

f. Provide the Respondent's financial statements for current year to

date and the prior year to date (the same period one year ago), including balance sheet, income statement, statement of cash flows, and pro forma statement.

g. Provide copies of monthly bank statements for all accounts held by or for the benefit of the Respondent that were open or maintained a balance for the last twelve-month period.

h. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:

i. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's activities at the Site;
ii. the dates such relationship existed;
iii. the percentage of ownership of Respondent that is held by such other entity(ies);
iv. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;
v. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at the Site; and
vi. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.

i. Provide any additional information which may be relevant in evaluating the Respondent's ability to pay for cleanup actions at the Site.

From: Paramjit Hothi <diamond.eleven@hotmail.com>

Sent: Monday, January 27, 2020 1:23 PM
To: Stanfield, Brooks <Stanfield.Brooks@epa.gov>
Subject: Re: Information Request - Request for Extension

Hi Brooks, can you tell me exactly what you require so that I can ask my account. I have absolutely no issue with providing you with what ever you require.

Sent from my iPhone

> On Jan 27, 2020, at 11:38 AM, Stanfield, Brooks <Stanfield.Brooks@epa.gov> wrote:
>
> Hi Parm-
> I am checking to see if you have managed to gather any of the tax return information from your accountant. If you have not, I wanted to determine when we could expect that information. My attorney reminded me to restate that submitting those to EPA could lead to a lesser demand from EPA for work or costs.
>
> Thank you.
>
> Brooks Stanfield
> Federal On-Scene Coordinator
> U.S. EPA Region 10
> Emergency Response Section
> 1200 Sixth Ave. Suite 155, MS 13-J07
> Seattle WA 98101-3140
> stanfield.brooks@epa.gov
>
> (o) 206-553-4423
> (c) 206-379-2996
> (f) 206-553-0175
>
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>
> ---
>
> **From:** Paramjit Hothi <diamond.eleven@hotmail.com>
> **Sent:** Thursday, January 16, 2020 9:06 PM
> **To:** Stanfield, Brooks <Stanfield.Brooks@epa.gov>
> **Cc:** Fowlow, Jeffrey <Fowlow.Jeffrey@epa.gov>; Leefers, Kristin <Leefers.Kristin@epa.gov>; Tom McDonald

<tmcdonald@cascadialaw.com>;
(b) (6)
Subject: Re: Information Request - Request for Extension

Hi Brooks,
Thanks for your reply.
Let me check with my accountant and get back to you in regards to the tax information, but I have provided all that we have.

Yes a phone call would work for us and yes we would definitely like to include Tom in that call.

Sent from my iPhone

> On Jan 15, 2020, at 7:39 PM, Stanfield, Brooks <Stanfield.Brooks@epa.gov> wrote:
>
> Mr. Hothi-
> I apologize that I haven't been more communicative. The last month or so I have been working pretty steadily on reviewing responses to our 104(e) information request. I met with my attorney today and I have several meetings scheduled in the next week.
>
> We have reviewed your response to our information request and I wanted to thank you for taking the time to put all that together. I did want to circle back and make sure we receive all the information from section 4 (Financial Information). We did get the bank statements you provided but there is still critical information that we still need from that section starting with tax returns from 2014-2018, as outlined in section 4.a. If we can confirm the timeframe that you can provide that information, we would greatly appreciate it.
>
> I think after the meetings I have set up next week, it would be a good point to touch base by phone or in person to go over where EPA is at and where we see things heading at the

Spokane Recycling property and the property to the north where the sediment ponds reside. I think we can cover environmental/technical topics as well as legal questions. So that might be a good opportunity for Mr. McDonald to join us. If you'd like to do that, I will start to work with you on finding a day and time that everyone is available.

Thanks again for your communication.

Brooks Stanfield
Acting Section Chief
Emergency Response Section
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1200 Sixth Ave. Suite 155, 13-J07
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(c) 206-379-2996

<image003.jpg>

From: Paramjit Hothi <diamond.eleven@hotmail.com>
Sent: Monday, January 13, 2020 8:35 PM
To: Stanfield, Brooks <Stanfield.Brooks@epa.gov>; Fowlow, Jeffrey <Fowlow.Jeffrey@epa.gov>; Leefers, Kristin <Leefers.Kristin@epa.gov>
Cc: Tom McDonald <tmcdonald@cascadialaw.com>; (b) (6)
Subject: Information Request - Request for Extension

Hi Brooks,

I am just following up on the request for information that I sent to you. Just wondering if you have any update to this.

FYI - Tom McDonald will also email/call to

follow up with you about this too.

Regards,
Parm Hothi

From: Paramjit Hothi <diamond.eleven@hotmail.com>
Sent: October 8, 2019 9:21 PM
To: Leefers, Kristin <Leefers.Kristin@epa.gov>
Subject: Information Request - Request for Extension

Hi Kris Leefers,

I am in receipt of your attached letter.

As I was in Spokane at the time of arrival I only opened the letter today, on October 7.

I am writing to ask for an extension of up to November 30, 2019 to comply with your request.

Also most of my documentation is pdf files and therefore requesting if all documentation can be sent via email and email attachments.

I look forward to your reply.

Paramjit Hothi