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ENVIR. APPEALS BOARD

OFICINA ASESORA LEGAL GENERAL

*Via Facsimile ((202) 233-0121) and Mail*

February 28, 2012

Ms. Eurika Durr  
Clerk of the Board  
Environmental Appeals Board (1103B)  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460-0001

**In re: Puerto Rico Aqueduct and Sewer Authority, NPDES Appeal No. 11-08**

Dear Ms. Durr:

Enclosed for filing are:

1. the Parties' Joint Motion For Further Stay Of Proceedings To Allow Parties To Participate In ADR Pilot Program, and
2. a proposed order granting same.

Please do not hesitate to contact me if you have any questions.

Respectfully submitted,

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Jorge Marrero Narváez  
Counsel for PRASA

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BEFORE THE ENVIRONMENTAL APPEALS BOARD  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C.

In re:

Puerto Rico Aqueduct and Sewer Authority

NPDES Permit No. PR0021555

NPDES Appeal No. 11-08

**JOINT MOTION FOR FURTHER STAY OF PROCEEDINGS TO ALLOW PARTIES  
TO PARTICIPATE IN ADR PILOT PROGRAM**

By letter dated December 7, 2011, the parties in the above-captioned matter—the U.S. Environmental Protection Agency – Region 2 (“EPA”), and Puerto Rico Aqueduct and Sewer Authority (“PRASA”), (collectively, the “Parties”)—notified the Environmental Appeals Board (“Board”) that the Parties agreed to participate in the Board’s Alternative Dispute Resolution (“ADR”) pilot program. By order dated December 20, 2011 (“Order Staying Proceedings to Allow Parties to Participate in ADR Pilot Program”), the Board stayed all proceedings in this matter until February 29, 2012.

The Parties hereby jointly move for a two week extension of the stay, i.e., until March 14, 2012. The Parties believe that good cause exists for the requested extension, based on the following:


1. The Parties have engaged in good faith negotiations in an attempt to resolve their differences and settle this matter.

2. The Parties have conducted the negotiations diligently and with a substantial commitment of personnel and resources. For instance, the Parties have had an in-person settlement meeting in San Juan, and numerous settlement conference calls.
  3. The Parties have reached agreement on the specific language as to the settlement of one of the two issues in this proceeding.
  4. The Parties have made substantial progress toward resolution but require additional time to reach a final agreement on the other issue in this proceeding.
- Indeed, as to this issue, the Parties have exchanged drafts of settlement language.

This motion has been discussed with, and is being filed with the consent of, EPA counsel of record.

The Parties therefore respectfully request an extension of the stay until March 14, 2012.

Respectfully submitted,



Jorge Marrero Narváez  
Puerto Rico Aqueduct and Sewer Authority  
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Date: February 28, 2012

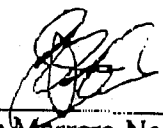
**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion For Further Stay of Proceedings to Allow Parties to Participate in ADR Pilot Program in *In re Puerto Rico Aqueduct and Sewer Authority*, NPDES Appeal No. 11-08, was sent on the below listed date to the following person in the manner indicated:

***By Facsimile & First Class U.S. Mail:***

Diane Gomes  
Office of Regional Counsel  
Environmental Protection Agency ~ Region 2  
290 Broadway -- 16th Floor  
New York, NY 10007-1866  
Facsimile: (212) 637-3202

Date: February 28, 2012

  
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