The Environmental Law Firm"

Dallas . Austin

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EAX - 214.692.6610
www.guidastavichflores.com

October 17, 2014

# Via Hand-Delivery

Regional Hearing Clerk (6RC-D) U.S. Environmental Protection Agency Region 6, 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Re: In the Matter of CITGO Petroleum Corporation [sic]

EPA Docket Number CAA-06-2014-3304

Dear Sir/Madam:

Enclosed please find for filing an original and one (1) copy of Respondent's Unopposed Motion for Extension of Time to File Answer, and corresponding Order. Please return a file stamped copy to the undersigned in the enclosed self-addressed and stamped envelope. Thank you for your assistance.

Sincerely,

∕Jean M. Flores

Cc: Jacob A. Gallegos, MC: (6RC-ER) (via hand-delivery)

Attorney, RCRA Enforcement Branch

Office of Regional Counsel

U.S. Environmental Protection Agency, Region VI

1445 Ross Ave., Suite 1200 Dallas, Texas 75202-2733

42161-v1

Austin Office

816 Congress Avenue, Suite 1500 Austin, Texas 78701 Tel - 512.476.6300 Fax - 512.476.6331

UNITED STATE

ENVIRONMENTAL PROTECTION AGENCY 2014 OCT 17 AM 11: 02

REGION 6

BEFORE THE ADMINISTRATOR

REGIONAL BLAKING CLERK EPA REGION VI

	§	
IN THE MATTER OF:	Ş	EPA DOCKET NO.
	§	CAA-06-2014-3304
CITGO Petroleum Corporation	§	
CITGO East Plant Refinery	š -	
	§	
Corpus Christi, Nucces County,	§	UNOPPOSED MOTION FOR
State of Texas	Ş	EXTENSION OF TIME TO FILE
	δ	ANSWER
RESPONDENT	š	
	8	

Respondent, CITGO Refining and Chemicals Company, LP (incorrectly named in the Complaint as CITGO Petroleum Corporation, CITGO East Plant Refinery), by and through its counsel, files this Unopposed Motion for Extension of Time to File Answer, and requests the Regional Judicial Officer to sign the attached Order granting an extension for a period of thirty days. Pursuant to 40 C.F.R. §§ 22.15(a) and 22.7(a), without an extension, the Answer would be due on October 20, 2014. Respondent has conferred with counsel for Complainant, the U.S. Environmental Protection Agency, and Complainant does not oppose this request which would extend the due date for filing of the Answer to November 19, 2014.

Respectfully requested this 17th day of October, 2014.

## GUIDA, SLAVICH & FLORES, P.C.

Carrick Brooke-Davidson

TX State Bar No. 05430650

Joseph F. Guida

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750 N. St. Paul Street

Suite 200

Dallas, Texas 75201

(214) 692-0009

(214) 692-6610 - Facsimile

ATTORNEYS FOR RESPONDENT REFINING AND CHEMICALS COMPANY, LP

### CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of October 2014, the original Unopposed Motion for Extension of Time to File Answer, and corresponding Order, and one (1) copy of same were sent for filing via hand delivery to the Regional Hearing Clerk (6RC-D), U.S. Environmental Protection Agency, Region 6, 1445 Ross Avenue, Suite 1200, Dallas, Texas 75202-2733, with a copy served via hand delivery to counsel for the Complainant at the address below:

Jacob A. Gallegos
Attorney, RCRA Enforcement Branch
Office of Regional Counsel
U.S. Environmental Protection Agency, Region VI
1445 Ross Ave., Suite 1200
Mail Code: (6RC-ER)
Dallas, Texas 75202-2733

fran Flores

# UNITED STATE ENVIRONMENTAL PROTECTION AGENCY REGION 6 BEFORE THE ADMINISTRATOR

IN THE MATTER OF:	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	EPA DOCKET NO.
	8	CAA-06-2014-3304
CITGO Petroleum Corporation	8	
CITGO East Plant Refinery	8	
•	8	
Corpus Christi, Nueces County,	§	
State of Texas	§	
	§	
RESPONDENT	§	
	§	
·	Jnopposed M	RDER  Motion for Extension of Time to File Answer is two until November 19, 2014 to file its Answer to
	Ro	egional Judicial Officer
Dated:		

### CERTIFICATE OF SERVICE

I hereby certify that on the \_\_\_\_\_\_ day of October 2014, the original Order granting the Unopposed Motion for Extension of Time to File Answer was sent for filing via hand delivery to the Regional Hearing Clerk (6RC-D), U.S. Environmental Protection Agency, Region 6, 1445 Ross Avenue, Suite 1200, Dallas, Texas 75202-2733 and a copy was sent via U.S. Mail to counsel for Complainant and Respondent at the following addresses, respectively:

Jacob A. Gallegos
Attorney, RCRA Enforcement Branch
Office of Regional Counsel
U.S. Environmental Protection Agency, Region VI
1445 Ross Ave., Suite 1200
Mail Code: (6RC-ER)
Dallas, Texas 75202-2733

And

Jean M. Flores Guida, Slavich & Flores, P.C. 750 N. St. Paul Street Suite 200 Dallas, Texas 75201