

USEPA – Region II
Regional Hearing Clerk

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

In the Matter of:

Wego Chemical Group, Wego Chemical LLC, Wegochem International LLC, Wego Chemical and Mineral LLC, Wego Chemical Group LP, Wego Chemical Group Inc., and Wego Chemical and Mineral Corp.,

Respondents.

Proceeding Under Section 16(a) of the Toxic Substances Control Act, as amended, 15 U.S.C. § 2615(a).

RESPONDENTS' THIRD UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER

Docket No. TSCA-02-2026-9241

RESPONDENTS' THIRD UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER

1. Pursuant to 40 C.F.R. §§ 22.7(b) and 22.16(a), Respondents Wego Chemical Group, Wego Chemical LLC, Wegochem International LLC, Wego Chemical and Mineral LLC, Wego Chemical Group LP, Wego Chemical Group Inc., and Wego Chemical and Mineral Corp., (“Wego”), by and through undersigned counsel, respectfully request an extension of sixty-seven (65) days for Wego to file its Answer to the Complaint in the above-captioned matter, from October 1, 2026 until December 4, 2026.

2. On May 26, 2026, Respondents were served with the Complaint and Notice of Opportunity for Hearing in this proceeding via certified mail.

3. Pursuant to 40 C.F.R. § 22.15(a), Respondents’ original deadline to file an Answer was June 25, 2026.

4. On June 22, 2026, Hon. Dana P. Friedman, Regional Judicial Officer for the U.S. Environmental Protection Agency, Region 2, granted Wego’s unopposed motion for extension of time to answer, setting a new deadline of July 27, 2026.

5. On July 23, 2026, Hon. Dana P. Friedman, Regional Judicial Officer for the U.S. Environmental Protection Agency, Region 2, granted Wego’s second unopposed motion for extension of time to answer, setting a new deadline of October 1, 2026

6. Good cause supports this extension.

- a. The parties have expressed their desire to engage in settlement discussions and are hopeful that additional time will enable the parties to reach a resolution without litigation.
- b. Discussions to date strongly suggest that there is significant likelihood that the parties will be able to reach such a resolution.

7. Since Wego's last extension request, the parties have continued to engage in settlement negotiations. Specifically:

- a. On August 8, 2026, Wego submitted documentation relevant to a potential settlement to EPA.
- b. On August 24, 2026, EPA requested additional documentation from Wego.
- c. On August 31, 2026, the parties met via video conference to discuss the documents provided to date and EPA's request for additional documents.
- d. On September 4, 2026, Wego provided additional documentation to EPA in response to the agency's August 24, 2026, request and the discussion thereof on August 31, 2026.
- e. On September 10, 2026, EPA sent Wego additional inquiries regarding the documents provided.
- f. On September 11, 2026, Wego responded to the inquiries EPA sent on September 10, 2026.
- g. On September 16, 2026, Wego provided additional documentation requested in the inquiries sent by EPA on September 10, 2026.
- h. On September 24, 2026, the parties held a settlement conference via video conference.

8. While the parties have not yet reached a settlement agreement, the parties have discussed and come to an agreement in principle on certain components of any potential settlement agreement.

9. At the conclusion of the September 24, 2026, settlement conference, the parties reaffirmed their desire to resolve this matter through a mutually agreeable settlement and committed to continuing the settlement negotiations. In furtherance of the parties' desire to resolve this matter through settlement, the parties have committed to the following:

- a. To hold, via video conference, a settlement conference on October 8, 2026.
- b. To hold, via video conference or in person, as appropriate, settlement conferences every two weeks thereafter.

10. Furthermore, the Complaint raises numerous complex factual and regulatory allegations. As a result, the pre-hearing exchanges of information and any pre-hearing motions practice that would need to occur once the Complaint has been answered would require extensive time and effort. The parties wish to avoid expending their limited resources on exchanges that would be rendered unnecessary if a settlement of this matter is reached.

11. No party will be prejudiced by the requested extension. Both parties believe that the requested extension is in their interest in that it would allow the parties the fullest opportunity to reach a mutually agreeable settlement.

12. Undersigned counsel has conferred with counsel for Complainant. Counsel for Complainant has stated that Complainant does not object to the requested extension.

13. This Motion is timely filed in accordance with 40 C.F.R. § 22.7(b).

WHEREFORE, Respondents respectfully request an extension of Respondents' deadline to file an Answer by sixty-five (65) days from October 1, 2026, to December 4, 2026.

Respectfully submitted,

Dated: September 28, 2026

Kevin S. Minoli Digitally signed by Kevin S. Minoli
Date: 2026.09.28 08:54:37 -04'00'

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Counsel for Respondents

CERTIFICATE OF SERVICE

Pursuant to 40 C.F.R. § 22.5(b)(2), I hereby certify that on September 28, 2026, a true and correct copy of the foregoing Respondents' Unopposed Motion for Extension of Time to Answer was served upon the following by electronic mail.

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 2
Email: Region2_RegionalHearingClerk@epa.gov

Lee A. Spielmann
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Kevin S. Minoli/s

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