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EPA ORC OFFICE OF REGIONAL HEARING CLERK

October 17, 2011

Via Express Mail

Wanda Santiago Regional Hearing Clerk U.S. Environmental Protection Agency – Region I 5 Post Office Square, Suite 100 (ORA18-1) Boston, MA 02109-3912

Re: Request for Extension of Time to Answer Administrative Complaint

Docket No. CWA-01-2011-0123

Dear Ms. Santiago:

Enclosed for filing in the above-referenced action, please find one original and one copy of a Request for Extension of Time to Answer Administrative Complaint and Opportunity to Request Hearing submitted by BOSFuel Corporation.

Sincerely,

Lloyd W. Landreth

Environmental Counsel for BOSFuel Corporation

Enclosure

Via Electronic Mail

cc: Jill Metcalf, Regional Judicial Officer, EPA Region 1

Tonia Bandrowicz, Esq. - EPA Region 1

Dawn Oakley, Esq. - Swissport

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I RECEIVED

IN THE MATTER OF:

BOSFuel Corporation c/o American Airlines 4333 Amon Carter Blvd. Fort Worth, TX 75261

And

Swissport Fueling, Inc. 45025 Aviation Drive, Suite 350 Dulles, VA 20166

Respondents

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JOINT REQUEST FOR EXTENSION OF TIME TO ANSWER ADMINISTRATIVE COMPLAINT AND TO REQUEST HEARING

Docket No. CWA 01-2011-0123

COMES NOW Respondents BOSFuel Corporation ("BOSFuel") and Swissport Fueling, Inc. ("Swissport") (collectively, "Respondents"), and respectfully apply to Regional Judicial Officer Jill Metcalf for an extension of time to Answer the Administrative Complaint and to Request Hearing until December 2, 2011.

In support of its Request, Respondents state as follows:

- 1. The extension of time is requested to allow sufficient time for the parties to meet and confer regarding a resolution of this matter outside of litigation.
- 2. Senior Enforcement Counsel for the U.S. Environmental Protection Agency Region I, Tonia Bandrowicz, Esq. has been contacted and has agreed to this requested extension.
- This requested extension of time is made for good cause and not for purpose of delay.

WHEREFORE, Respondents BOSFuel Corporation and Swissport Fueling, Inc. request Regional Hearing Officer Jill Metcalf grant an Extension of Time to Answer the Administrative Complaint and to Request Hearing until December 2, 2011.

Respectfully submitted,

Lloyd W. Landreth Landreth Law Firm 801 East B Street

Jenks, Oklahoma 74037-4307 Telephone: 918.296.0460 Facsimile: 918.296.0404

Email: <u>llandreth@landrethlaw.com</u>

and

Dawn Oakley

Secretary and General Counsel

Swissport Fueling, Inc.

45025 Aviation Drive, Suite 350

Dulles, VA 20166

Telephone: 703-742-4319 Facsimile: 703-742-4342

Email: dawn.oakley@swissport.com

CERTIFICATE OF MAILING

I certify that on the 18 day of October, 2011, a true and correct copy of the foregoing instrument was placed in the United States Mail, postage prepaid, to:

Wanda Santiago

Regional Hearing Clerk

U.S. Environmental Protection Agency - Region I

5 Post Office Square, Suite 100 (ORA18-1)

Boston, MA 02109-3912