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2012 MAY 25 A 11: 06

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OFFICE OF
HEARING CLERK

May 24, 2012

VIA UNITED PARCEL SERVICE

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency
Region 1 (ORA 18-1)
5 Post Office Square
Boston, MA 02109

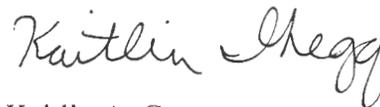
Re: In the Matter of Northland Environmental, LLC and PSC Environmental Services, LLC
Docket No. RCRA-01-2012-0028

Dear Ms. Santiago:

Enclosed for filing in the above-referenced matter please find the original and one copy of an Unopposed Motion for Second Extension of Time to File an Answer and to Request a Hearing.

Thank you for your attention to this matter.

Sincerely,



Kaitlin A. Gregg

Counsel for Northland Environmental, LLC
and PSC Environmental Services, LLC

Enclosures

cc: Andrea Simpson, Esq. (via UPS) (w/encl.)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

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In the Matter of:)
)
Northland Environmental, LLC)
275 Allens Avenue)
Providence, RI 02905)
)
PSC Environmental Services, LLC)
5151 San Filipe Street, Suite 1600)
Houston, TX 77056)
)
Respondents)
)
Proceeding under Section 3008(a))
Resource Conservation and Recovery)
Act, 42 U.S.C. § 6928(a))
_____)

Docket No.
RCRA-01-2012-0028

**UNOPPOSED MOTION FOR
SECOND EXTENSION OF TIME
TO FILE AN ANSWER AND
TO REQUEST A HEARING**

Pursuant to 40 C.F.R. §§ 22.7 and 22.16, Respondents Northland Environmental, LLC and PSC Environmental Services, LLC (collectively, "Respondents") respectfully move for a second 45-day extension of time to file an answer to the complaint and to request a hearing in this matter, until Thursday, July 19, 2012.

In support of this motion, Respondents state as follows:

1. Respondents received an initial extension of time to file an answer to the complaint and to request a hearing, moving the deadline to June 4, 2012.

2. Respondents engaged in an initial settlement conference with staff at EPA Region 1 on May 3, 2012, and settlement discussions are currently ongoing.

3. Respondents request a second extension of time to file an answer to the complaint while the settlement process continues. A second 45-day extension of time to file an answer and to request a hearing will allow Respondents to continue to focus their resources on the settlement process in the immediate term, and will still provide sufficient time to prepare an answer if settlement negotiations do not progress to the satisfaction of either party.

4. Respondents are authorized to represent that counsel for Complainant assents to this motion.

WHEREFORE,

Respondents respectfully request that the deadline for Respondents to file an answer and to request a hearing in this matter be extended to and including Thursday, July 19, 2012.

Dated: May 24, 2012



Mitchell H. Bernstein
Van Ness Feldman
1050 Thomas Jefferson St. NW, Suite 700
Washington, DC 20007-3877

Counsel for Northland Environmental, LLC
and PSC Environmental Services, LLC

CERTIFICATE OF SERVICE

I hereby certify that on that date noted below, the foregoing Unopposed Motion for Second Extension of Time to File an Answer and to Request a Hearing was sent to following parties via United Parcel Service, as set forth below:

Original and one copy:

Wanda Santiago
Regional Hearing Clerk
U.S. EPA, Region 1 (ORA 18-1)
5 Post Office Square, Suite 100
Boston, MA 02109

Copy:

Andrea Simpson, Esq.
Senior Enforcement Counsel
U.S Environmental Protection Agency
Region 1
5 Post Office Square, Suite 100
Boston, MA 02109

Dated: May 24, 2012



Mitchell H. Bernstein
Van Ness Feldman
1050 Thomas Jefferson St NW, Suite 700
Washington, DC 20007

Counsel for Northland Environmental. LLC
and PSC Environmental Services, LLC