

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

In the Matter of:

GVS North America, Inc.
63 Community Drive
Sanford, ME 04073

EPA ID No. MED980914451

Respondent

Docket No. RCRA-01-2017-0053

**MOTION FOR FURTHER EXTENSION
OF TIME IN WHICH TO ANSWER
THE ADMINISTRATIVE COMPLAINT**

Proceeding Under Section 3008(a) of the
Resource Conservation and Recovery Act,
42 U.S.C. §6928(a)

**MOTION FOR FURTHER EXTENSION OF TIME
IN WHICH TO ANSWER THE ADMINISTRATIVE COMPLAINT**

I. NEED FOR AN EXTENSION

Since GVS North America, Inc.'s ("Respondent") receipt of the Administrative Complaint and Notice of Opportunity to Request a Hearing in the above-captioned matter, it has provided information to and participated in a settlement meeting with EPA Senior Enforcement Counsel Kathleen Woodward. Settlement discussions have proceeded, including discussion of a Supplemental Environmental Project ("SEP"). While the substance of the SEP has been proposed, certain specific details have not yet been worked out as they require input from third-parties. For that reason, Respondent requests an additional thirty (30) day extension of the deadline for filing an answer to the Complaint.

This extension is necessary in order to allow further substantive settlement discussions. It would impose an unnecessary burden on the Respondent to require preparation of an answer to the Complaint if, as appears possible, settlement of this matter and full compliance with the relevant regulations can be achieved without having to do so. The requested thirty (30) day extension should provide sufficient time to complete these settlement discussions.

Attorney Woodward has indicated that she has no objection to this request for an extension of time to answer the Complaint until March 16, 2018.

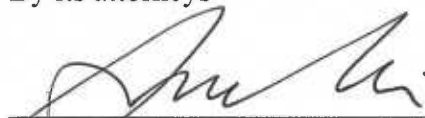
II. AUTHORITY TO GRANT AN EXTENSION

The Presiding Officer may grant an extension of time for filing any document, including a written answer to an administrative complaint, upon timely motion of a party to the proceeding, for good cause shown, and after consideration of prejudice to other parties, under the Consolidated Rules of Practice, 40 C.F.R. § 22.7(b). This motion is made sufficiently in advance of the extended due date of February 16, 2018, is intended to allow all parties to pursue settlement of this matter at an early stage of these proceedings and is not opposed by the EPA. For these reasons, Respondent's request complies with the requirements of 40 C.F.R. §22.7.

III. REQUEST FOR EXTENSION

There is no prejudice to any other party and there is good cause for an extension of time in which to file an answer to the Complaint. Therefore, the Respondent respectfully requests that the time for filing an answer to the Complaint be extended to March 16, 2018.

Respectfully Submitted,
GVS North America, Inc.
By its attorneys



Ann M. Sobolewski
POSTERNAK BLANKSTEIN & LUND LLP
Prudential Tower
800 Boylston Street
Boston, MA 02199-8004
(617) 973-6100
asobolewski@pbl.com