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2007 OCT 20 AM 8:52  
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October 26, 2007

Tina Artemis  
Regional Hearing Clerk  
U.S. Environmental Protection Agency (8RC)  
1595 Wynkoop Street  
Denver, CO 80202-1129

Re: TW SERVICE INC.TSCA-08-2007-0015  
TSCA-08-2007-0017

Tina:

Please find enclosed for filing one original and one copy of the UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER and AFFIDAVIT IN SUPPORT OF UNOPPOSED MOTION FOR EXTENSION TO ANSWER for TSCA-08-2007-0015 and one original and one copy of the UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER and AFFIDAVIT IN SUPPORT OF UNOPPOSED MOTION FOR EXTENSION TO ANSWER for TSCA-08-2007-0017. If you have any questions regarding this matter, please feel free to contact me.

Sincerely,



Patrick T. Pardy  
of Mumford, Protsch & Pardy, L.L.P.

PTP/mp

cc:  
Dana J. Stotsky

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 8  
DOCKET NO. TSCA-08-2007-0017

2007 OCT 30 AM 8:52

RECEIVED  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 8 OFFICE

TW Services, Inc. )  
1606 NE 3<sup>rd</sup> Street )  
Madison, SD 57042 ) UNOPPOSED MOTION FOR  
) EXTENSION OF TIME  
) TO ANSWER

Respondent, TW Services Inc., by and through its counsel pursuant to §22.7(b) of the Consolidated Rules of Practice ("C.R.P."), 40 C.F.R. part 22), moves for an extension of time to file its Answer in the proceeding and states as follows:

1. The Penalty Complaint and Notice of Opportunity for Hearing ("Complaint") in this proceeding was filed on September 28, 2007 and served on Respondent.
2. Respondent received the Complaint on October 4, 2007.
3. Pursuant to C.R.P. 22.15(a), Respondent's Answer is due within thirty (30) days of its receipt of the Complaint or on or before November 3, 2007.
4. Respondent has engaged counsel to represent it in this proceeding, but due to the press of other business, Respondent's counsel is unable to complete his investigation into the matter and prepare an Answer by November 3, 2007.
5. In addition, Respondent seeks an opportunity to discuss this case with Dana J. Stotsky, the assigned Enforcement Attorney, before filing its Answer.
6. On October 25, 2007, the undersigned spoke by telephone with Dana J. Stotsky to request Complaint's position on an extension of time to file the Answer. Mr. Stotsky informed the undersigned that Complaint does not oppose a motion for a extension of time to file the Answer.

7. Under the circumstances, good cause exists for this motion, and no party will be prejudiced by the relief requested herein. Accordingly, Respondent requests that an order be entered granting it a 34 day extension of time, to and including December 8, 2007 to file its Answer in this proceeding.

Respectfully submitted,

Mumford, Protsch & Pardy L.L.P.

Date: 26 Oct 07

By:   
Patrick T. Pardy  
Attorney At Law  
P.O. Box 510  
Madison, SD 57042

CERTIFICATE OF SERVICE

I certify that on this 26<sup>th</sup> day of October, 2007, a copy of the foregoing was served by United States mail, postage prepaid, properly addressed to:

Dana J. Stotsky  
Senior Enforcement Attorney  
United States Environmental Protection Agency  
Region 8, Office of Enforcement, Compliance and  
Environmental Justice  
1595 Wynkoop Street (ENF-L)  
Denver, CO 80202  
Complainant

An original and one copy was sent via CERTIFIED MAIL, RETURN RECEIPT REQUESTED, POSTAGE PREPAID TO:

Tina Artemis  
Regional Hearing Clerk  
U.S. Environmental Protection Agency (SRC)  
1595 Wynkoop Street  
Denver, CO 80202-1129



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 8  
DOCKET NO. TSCA-08-2007-0017

TW Services, Inc.                    )  
1606 NE 3<sup>rd</sup> Street                )  
Madison, SD 57042                 )  
Respondent.                         )  
  )

AFFIDAVIT IN SUPPORT OF  
UNOPPOSED MOTION FOR  
EXTENSION TO ANSWER

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State of South Dakota            )  
  ):SS:  
County of Lake                    )

I, Patrick T. Pardy being first duly sworn on oath,  
deposes and says the follows:

That I was hired on October 25, 2007 by TW Services,  
Inc. to represent them in the above entitled matter.

That I contacted Dana J. Stotsky, Senior Enforcement  
Attorney, US EPA, on October 25, 2007 to discuss the above-  
entitled matter and he agreed not to appose my motion for  
EXTENSION TO ANSWER, so that I could research the case and  
allow for an opportunity for the respondent and the EPA to  
try and settle through an informal settlement conference.

Dated at Madison, South Dakota this 26 day of October, 2007.

  
\_\_\_\_\_  
Patrick T. Pardy  
Mumford, Protsch & Pardy  
Attorney for Respondent  
P.O.Box 510  
Madison, SD 57042

Subscribed and sworn to before me this 26 day of October,  
2007.  
(SEAL)

  
\_\_\_\_\_  
Notary Public, South Dakota  
My commission expires: 7-31-2013