



**Annino
Draper &
Moore, P.C.**

Calvin W. Annino, Jr.
Mark E. Draper
Louis S. Moore
M. Trant Campbell
Tracie M. Kester*

*Also admitted in CT

Annino, Draper & Moore, P.C.
Attorneys at Law

Springfield Office
1500 Main Street
Suite 2504
P.O. Box 15428
Springfield, MA 01115-5428
(413) 732-6400
Fax (413) 732-3339

Westfield Office
75 Broad Street
Second Floor
Westfield, MA 01085
(413) 562-9829

Northampton Office
16 Armory Street
Northampton, MA 01060
(413) 587-0730

www.admlawfirm.com

imoore@admlawfirm.com

November 21, 2013

RECEIVED
2013 NOV 26 P 12:42
EPA ORC
OFFICE OF
REGIONAL HEARING CLERK

Ms. Wanda Santiago
Regional Hearing Clerk
USEPA, Region 1
5 Post Office Square, Suite 100
(Mail Code: ORA18-1)
Boston, MA 02109-3912

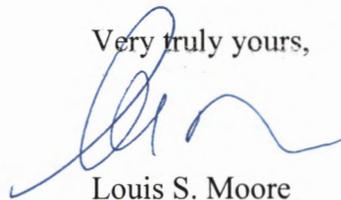
**Re: PCA Systems, Inc.
Docket No. CAA-01-2013-0044**

Dear Ms. Santiago:

I enclose for filing in the above matter an original and one copy of Respondent's Second Unopposed Motion for Extension of Time to Answer Complaint. EPA does not object to this Motion.

Please contact me with any questions.

Very truly yours,



Louis S. Moore

LSM/lw
Enclosure

cc: William Chin, Esquire.
Enforcement Counsel

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

_____)	Docket No. CAA-01-2013-0044
In the Matter of:)	
PCA SYSTEMS, INC.)	RESPONDENT'S SECOND
Respondent.)	UNOPPOSED MOTION FOR
)	EXTENSION OF TIME TO
)	ANSWER COMPLAINT
)	
Proposing to Assess a Civil Penalty Under)	
Section 113(d) of the Clean Air Act,)	
42 U.S.C. §7413(d))	
_____)	

Respondent, PCA Systems, Inc., by and through its attorneys, Annino, Draper & Moore P.C., and pursuant to Consolidated Rules of Practice, 40 C.F.R. Part 22.7(b), hereby files its second unopposed motion for an extension of time to file a written request for hearing and an Answer, or otherwise respond to the Administrative Complaint up to and including January 17, 2014. EPA does not object to this Motion. In support of this motion, Respondent states as follows:

1. On October 17, 2013, the Respondent filed its unopposed Motion for Extension of Time to Answer the Complaint until December 6, 2013. This Motion was granted on November 4, 2013.
2. The Respondent and EPA have been actively involved in substantive settlement negotiations regarding all issues raised in the Complaint. The parties have made significant progress toward a resolution.
3. EPA personnel assigned to this matter will be unavailable for two weeks during December.
4. This second extension will allow for a meaningful opportunity to continue settlement discussions with EPA that could substantially reduce the expenses of the parties, the time and expense

RECEIVED
2013 NOV 26 PM 4:22
EPA REGIONAL HEARING OFFICE

of the Regional Judicial Officer and the Environmental Appeals Board, and lead to a more efficient resolution of this case.

5. No prejudice to any party will result from granting this Motion.

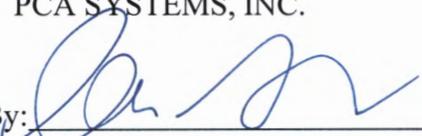
WHEREFORE, Respondent PCA Systems, Inc. respectfully requests:

A. That the period for filing an Answer to the Complaint be extended up to and including January 17, 2014; and

B. For such other and further relief as the judicial officer deems appropriate.

Respectfully submitted,
PCA SYSTEMS, INC.

Dated: November 21, 2013

By: 

Louis S. Moore
BBO # 353050
Their Attorney
Annino, Draper & Moore, P.C.
1500 Main Street, Suite 2504
P.O. Box 15428
Springfield, MA 01115-5428
Tel. (413) 732-6400
Fax: (413) 732-3339
lmoore@admlawfirm.com

CERTIFICATE OF SERVICE

I, hereby certify that on November 21, 2013, I served the foregoing "Motion for Extension of Time" on the following persons, in the manner specified below:

Original and one copy by First-Class Mail: Ms. Wanda Santiago
Regional Hearing Clerk
USEPA, Region 1
5 Post Office Square, Suite 100
(Mail Code: ORA18-1)
Boston, MA 02109-3912

One copy by First-Class Mail:

William Chin, Esquire
Enforcement Counsel
U.S. EPA, Region 1
5 Post Office Square – Suite 100
Suite 100 (Mail Code: OES04-4)
Boston, MA 02109-3912



Louis S. Moore