

## DEPARTMENT OF THE ARMY UNITED STATES MILITARY ACADEMY

West Point, New York 10996

October 27, 2017

2017 NOV -8 AM 7: 00

REPLY TO ATTENTION OF:

Office of the Staff Judge Advocate

Regional Hearing Clerk U.S. Environmental Protection Agency 290 Broadway, 16<sup>th</sup> Floor New York, New York 10007-1866

RE: Motion for Extension of Time to Respond, Docket No. RCRA-02-2017-7109

Dear Sir or Madame:

Enclosed please find a motion for an extension of time to respond to the Regional Judicial Officer's Complaint, Compliance Order and Opportunity for Hearing dated September 28, 2017. We received this document on October 11, 2017. The Assistant Regional Counsel assigned to this matter does not oppose our motion for extension.

Thank you for your consideration of this matter. Please do not hesitate to contact me at 845-938-6376 if you have any questions or concerns.

Respectfully submitted,

Lori L. Doughty

Academy Counsel

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Region 2

In the Matter of:	*
U.S. Department of the Army West Point Garrison, Respondent	MOTION FOR EXTENSION OF TIME TO RESPOND
Wood Folia Galmoon, Roopondon	
Proceeding Under Sections 3008 and 9006 of the Solid Waste Disposal Act,	
as amended.	Docket No. RCRA-02-2017-7109

## MOTION FOR EXTENSION OF TIME TO RESPOND

COMES NOW the U.S. Department of the Army, West Point Garrison, and pursuant to Title 40, Code of Federal Regulations, section 22.7(b), moves Regional Judicial Officer of Region 2 to allow Respondent an additional thirty (30) days to answer the Regional Judicial Officer's Complaint, Compliance Order and Opportunity for Hearing dated September 28, 2017, and in support of said motion, states as follows:

- 1. Respondent received the Complaint, Compliance Order and Opportunity for Hearing on October 11, 2017.
- 2. Respondent is currently in discussion with the Assistant Regional Counsel about a settlement of the Complaint. We are scheduled to meet on November 16, 2017.
- 3. The Assistant Regional Counsel is aware of Respondent's request for an extension of time to respond and does not object to said request.

WHEREFORE, Respondent prays the Regional Judicial Officer grants its Motion for Extension of Time to Respond to the Complaint, Compliance Order and Opportunity for Hearing, and/or for such other relief as the Regional Judicial Officer deems proper.

Respectfully submitted,

Department of the Army, West Point Garrison

Office of the Staff Judge Advocate United States Military Academy

646 Swift Road

West Point, New York 10996-1781

Telephone: 845-938-3205 Facsimile: 845-938-2390 Lori.doughty@usma.edu Academy Counsel

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 27<sup>th</sup> day of October, 2017, I mailed the foregoing to the following:

Regional Hearing Clerk U.S. Environmental Protection Agency Region 2 290 Broadway, 16th Floor New York, New York 10007-1866

Carl R. Howard, Esq. Assistant Regional Counsel Office of Regional Counsel U.S. EPA, Region 2 290 Broadway, Room 1635 New York, New York 10007-1866