

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2**

In the Matter of:

**MUNICIPALITY OF LOIZA
P.O. Box 508
Loiza, Puerto Rico 00772-0508**

RESPONDENT

**Proceeding pursuant to Section
309(g)(2)(B) of the Clean Water Act,
33 U.S.C. § 1319(g)**

**PROCEEDING TO ASSESS A
CLASS II CIVIL PENALTY**

**DOCKET NUMBER
CWA-02-2009-3457**

**REGIONAL HEARING
CLERK**

2010 JAN -4 PM 3:09

**U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG 2**

MOTION REQUESTING ADDITIONAL TIME

Counsel for Respondent, Municipality of Loiza, respectfully submits the following Motion Requesting Additional Time.

1. The Municipality of Loiza has been requested to provide information regarding storm water discharges from the municipal separate storm sewer systems in urbanized areas.
2. In order to comply with the ORDER CWA-02-2008-3119, and be able to submit a Notice of Intent for storm water discharges, associates with municipal separate storm sewer systems (MS4s) in urbanized areas, to surface water bodies and to develop, submit and to implement a Storm Water Management Program to bring the Municipality into compliance with the Act we need the specialized knowledge of an expert in this area.
3. That we filed our appearance as counsel on behalf of the Municipality of Loiza today.

4. Therefore, we request 120 days of additional time to research findings in this case and be in a better position to reply and comply with the order issued by the EPA.

PRAYER

The Respondent hereby submits this Motion Requesting Additional Time and request that this Honorable Agency:

1. Grant the additional time requested.

Respectfully submitted, in San Juan Puerto Rico this 15th day of December, 2009.

CERTIFICATE OF SERVICE

I certify that i have this day caused to be sent the foregoing Motion Requesting Additional Time, dated December 15, 2009, and bearing the above-referenced docket number, in the following manner to the respective addressees below:

Helen S. Ferrara
Regional Judicial Officer
U.S. EPA, Region 2
290 Broadway – Room 1626
New York, NY 10007 – 1866
Ph: 212-637-3233; Fax 212-637-3199

Karen Maples
Regional Hearing Clerk
Region 2
U.S. Environmental Protection Agency
290 Broadway – Room 1626
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MARGARITA MELÉNDEZ RENAUD
CN 18465

mmr

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NOTICE OF APPEARANCE AS COUNSEL

PLEASE TAKE NOTICE that Raul Santiago Perez, hereby files his appearance as counsel on behalf of Respondent in the above-captioned matter. Please direct all future pleadings, papers, correspondence, motions, and other material relevant to this action to the undersigned counsel.

RESPECTFULLY SUBMITTED in San Juan, Puerto Rico, this 15 day of December, 2009.

CERTIFICATE OF SERVICE

I certify that I have this day caused to be sent the foregoing Notice Of Appearance as Counsel, dated December 15, 2009, and bearing the above-referenced docket number, in the following manner to the respective addressees below:

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