## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY EIVED REGION I 2013 MAY 31 P 2: 44

In the Matter of:	) ) )	REGIONAL HEARING CLERK
The City of Woonsocket, Rhode Island	)	US EPA
	)	Docket Number:
Respondent,	)	CAA-01-2012-0114
	)	
Proceeding under Section 113(d) of the	)	
Clean Air Act, 42 U.S.C. § 7413(d)	)	
	)	

## MOTION FOR EXTENSION OF TIME TO FILE ANSWER

Pursuant to 40 CFR §22.16, the City of Woonsocket, Rhode Island ("Respondent") hereby moves for an extension of time up to and including July 31, 2013 to file its Answer to the Administrative Complaint ("Complaint") in the above-referenced matter. As grounds for the requested relief, Respondent states that after several conferences and settlement discussions the parties have reached consensus on a settlement proposal. As a result of these discussions, the parties have agreed upon terms for settlement, including a supplemental environmental project (SEP) and have drafted the basic documents. EPA is presently reviewing the draft Consent Order and SEP and preparing the settlement documents for presentation for the required approvals.

The parties expect to be in a position to present the settlement documents and Consent Order to the Regional Hearing Officer within the next 60 days. EPA has indicated to counsel that it has no objection to the requested extension.

WHEREFORE, Respondent respectfully requests that its Motion for Extension of Time to File an Answer be granted and that it be allowed up to and including July 31, 2013 to file its Answer to the Complaint.

Respondent,

The City of Woonsocket, Rhode Island

By its Attorneys,

Alan M. Shoer (R.I. Bar # 3248/MA Bar #542490

Kristen W. Sherman (R.I. Bar #5595/MA Bar #630141)

ADLER POLLOCK & SHEEHAN P.C.

One Citizens Plaza, 8<sup>th</sup> Floor Providence, Rhode Island 02903

Tel: (401) 274-7200 Fax: (401) 351-4607 ashoer@apslaw.com ksherman@apslaw.com

Dated: May 30, 2013

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the within Motion for Extension of Time to File Answer was served on the following via hand delivery on the 3/ day of May, 2013.

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code: ORA18-1
Boston, Massachusetts 02109-3912

Steven Schlang, Esq.
Senior Enforcement Counsel
Office of Environmental Stewardship
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100

Mail Code: OES 04-3

Boston, Massachusetts 02109-3912