

October 1, 2013

By FedEx

US EPA Region 5
Office of the Regional Hearing Clerk
Attn: La Dawn Whitehead
77 West Jackson Boulevard
Mailcode: E-19J
Chicago, IL 60604-3590

RE: In the Matter of: Revere Plastics Systems, LLC
Docket No. EPCRA-05-2013-0025

Dear Ms. Whitehead:

Enclosed please find our Unopposed Motion for Extension of Time to Answer Complaint in the above-referenced matter. Please file and return a time-stamped copy in the envelope provided.

Please notify the undersigned when this Motion has been granted.

Thank you for your attention to this matter.

Sincerely,



Nathan C. Hunt

Enclosures

cc: Ann Coyle (*w/enclosure*)
Kris Vezner (*w/enclosure*)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

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In the Matter of:) **Docket No. EPCRA-05-2013-0025**
)
Revere Plastics Systems, LLC)
Clyde, Ohio) **Unopposed Motion for Extension of Time**
) **to Answer Complaint**
Respondent.)
_____)

Now comes Respondent, by and through counsel, and hereby moves for an additional thirty (30) days from October 12, 2013, in which to answer the Complaint filed in the above-referenced matter. Counsel for U.S. EPA has been contacted and has no objection to this Motion.

The parties have reached a settlement concerning the alleged violations specified in the Complaint and are preparing the applicable settlement documents for review, approval and eventual execution by the parties. This process is unlikely to be completed prior to Respondent's original deadline of October 12, 2013 to answer the Complaint. Consequently, Respondent seeks an additional thirty (30) days from October 12, 2013 to answer the Complaint, during which time the parties can finalize their settlement of this matter.

Respectfully submitted,



Nathan C. Hunt, Esq.
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CERTIFICATE OF SERVICE

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The undersigned hereby certifies that a copy of the foregoing Motion for Extension of Time to Answer Complaint has been served by Regular U.S. Mail, this 1st day of October

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2013 upon:

Ann Coyle
Regional Judicial Officer (ORC/C-14J)
U.S. EPA – Region 5
77 West Jackson Boulevard
Chicago, IL 60604

Kris Vezner
Counsel for Complainant (ORC/C-14J)
U.S. EPA – Region 5
77 West Jackson Boulevard
Chicago, IL 60604



Nathan C. Hunt