

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
901 N. FIFTH STREET
KANSAS CITY, KS 66101

BEFORE THE ADMINISTRATOR

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ENVIRONMENTAL PROTECTION
AGENCY-REGION VII
REGIONAL HEARING CLERK

IN THE MATTER OF)
)
G. S. Robins and Company) Docket No. EPCRA-07-2006-0221
St. Louis, Missouri 63102)
)
Respondent.)

**RESPONDENT G. S. ROBINS AND COMPANY'S UNOPPOSED MOTION
FOR THIRD EXTENSION OF TIME TO ANSWER AND REQUEST HEARING**

COMES NOW Respondent G. S. Robins and Company ("Respondent"), by and through the undersigned counsel, and respectfully requests an extension of time until and including October 17, 2006, to answer and/or request a hearing in the above-referenced matter. In support of this motion, Respondent states the following:

1. On July 7, 2006, the Environmental Protection Agency, Region VII ("EPA"), filed the Complaint in the above-referenced action.

2. The Complaint was served on Respondent on July 10, 2006. The Regional Judicial Officer has entered two orders allowing for Respondent to file its Answer on or before October 3, 2006.

3. Pursuant to 40 C.F.R. Section 22.07, Respondent's seeks an additional fourteen (14) day extension of time, from October 3, 2006 until and including October 17, 2006, for Respondent to file its Answer to the Complaint.

4. In the above case, EPA and Respondent are engaged in settlement negotiations and the parties are close to a settlement in principle. Respondent has made a settlement offer and EPA responded with a counteroffer on September 26, 2006.

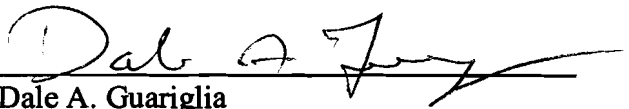
Respondent submitted a second offer of settlement to EPA today, and is hoping to receive a response from EPA in the next day or two. The settlement process has taken time since Respondent's settlement offers have involved supplemental environmental projects, which EPA has needed to review under its Supplemental Environmental Project Guidance Document.

5. Respondent has been authorized to state that EPA does not object to this extension of time.

6. Accordingly, Respondent requests an extension of time to file an answer to the Complaint until and including Tuesday, October 17, 2006.

Date: September 28, 2006

Respectfully submitted,



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ATTORNEYS FOR RESPONDENT G. S.
ROBINS AND COMPANY

CERTIFICATE OF SERVICE

The undersigned certifies that on this 28th day of September, 2006, a copy of the foregoing was served via U.S. Mail on the following:

Chris Dudding
Assistant Regional Counsel
United States Environmental Protection Agency
Region VII
901 N. 5th St.
Kansas City, KS 66101

