

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I**

In the Matter of:	) EPA Docket No. RCRA-01-2015-0084
	)
Waters Technologies Corporation,	)
177 Robert Treat Paine Drive	)
Taunton, MA 02780	)
	)
Respondent.	)

**MOTION OF WATERS TECHNOLOGIES  
CORPORATION FOR EXTENSION TO FILE ANSWER**

Pursuant to 40 C.F.R. §22.7(b), Respondent, Waters Technologies Corporation, by counsel, respectfully moves the Regional Judicial Officer to extend its deadline to file an Answer in the above referenced matter to April 25, 2016. In support of this motion, Water Technologies provides the following:

1. On October 28, 2015, Complainant filed an Administrative Complaint and Compliance Order ("Complaint") in this matter alleging that Waters Technologies violated the Resource Conservation and Recovery Act ("RCRA") and the Massachusetts federally authorized hazardous waste regulations. The Complaint is 50 pages long and contains numerous detailed allegations.
2. On November 19, 2015, Waters Technologies requested an extension to file its Answer to the Complaint in order to have additional time to complete an internal evaluation of the allegations in the Complaint, meet with a specialized environmental consulting firm, and discuss potential settlement or resolution of the Complaint with legal counsel for EPA Region 1.
3. On November 23, 2015, the Acting Regional Judicial Officer, LeAnn Jensen, granted Waters Technologies' motion and set the deadline for Respondent to file its Answer to the Complaint to January 6, 2016.
4. Based on productive settlement negotiations, counsel for Waters and Steven Schlang, Senior Enforcement Attorney, EPA Region 1, determined that a second extension to file an Answer to the Complaint was necessary.
5. On December 24, 2015, the Acting Regional Judicial Officer, LeAnn Jensen, granted Waters Technologies' motion and set the deadline for Respondent to file its Answer to the Complaint to February 7, 2016.
7. On January 29, 2016, Waters Technologies requested a third extension to file its Answer to the Complaint in light of the continued progress of the Parties towards reaching a resolution.

8. On February 1, 2016, the Acting Regional Judicial Officer, LeAnn Jensen, granted Waters Technologies' motion for a third extension and set the deadline for Respondent to file its Answer to the March 25, 2016.
9. Since Waters Technologies' previous request for an extension, the Parties have worked diligently to reach a final settlement agreement and have reached a settlement in principle to resolve this matter. Steven Schlang has unfortunately taken sick leave during February and March, and the Parties have not completed paperwork necessary to complete the Settlement Agreement.
8. An extension to April 25, 2016 will provide the Parties additional time to finalize the details of the settlement of the Complaint without requiring Waters Technologies to expend resources on drafting an Answer to the Complaint.
9. On March 16, 2016, counsel for Waters Technologies discussed an additional one-month extension to file its Answer to the Complaint with Steven Schlang, EPA Region 1, and Mr. Schlang requested that Waters Technologies file a request for an extension.
10. By this filing, Waters Technologies does not admit any liability for any of the allegations in the Complaint and reserves its right to file an Answer.
11. There are no other parties in this proceeding other than USEPA and Waters Technologies.

Respectfully submitted,

Waters Technologies Corporation  
*By Its Counsel*



Bonni F. Kaufman  
Aaron S. Heishman  
Holland & Knight LLP  
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Washington, DC 20006  
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**CERTIFICATE OF SERVICE**

I certify that on this 18th day of March, 2016, the foregoing Motion of Waters Technologies Corporation for Extension of Time to File Answer was sent to the following persons, by first class mail and UPS Overnight:

Wanda Santiago  
Regional Hearing Clerk  
U.S. EPA, Region I, Five Post Office Square  
Suite 100, Mail Code ORA18-1  
Boston, MA 02109

LeAnn Jensen  
Regional Judicial Officer  
U.S. EPA, Region I, Five Post Office Square  
Suite 100, Mail Code ORA  
Boston, MA 02109

Steven C. Schlang  
Senior Enforcement Attorney  
U.S. EPA, Region I, Five Post Office Square  
Suite 100, Mail Code OES04-4  
Boston, MA 02109



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(202) 469-5167  
[aaron.heishman@hklaw.com](mailto:aaron.heishman@hklaw.com)

March 18, 2016

*Via U.S. Mail and UPS Overnight*

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

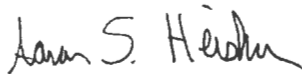
Re: In the Matter of: Waters Technologies Corporation  
Docket No: RCRA-01-2015-0084

Dear Ms. Santiago:

Please find enclosed for filing an original and one copy of Waters Technologies Corporation's Motion for Extension to File Answer in the above referenced matter.

Please do not hesitate to contact me should you have any questions.

Sincerely yours,



Aaron S. Heishman

Cc: Steven Schlang  
LeAnn Jensen

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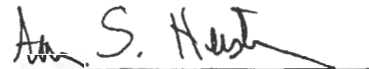
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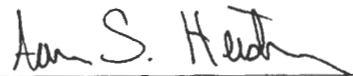
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