

Pepper Hamilton LLP
Attorneys at Law

Suite 200
100 Market Street
P.O. Box 1181
Harrisburg, PA 17108-1181
717.255.1155
Fax 717.238.0575

Michelle M. Skjoldal
direct dial: 717-255-1169
skjoldalm@pepperlaw.com

April 30, 2015

Filing Via Electronic Mail

Wanda Santiago (ORA18-1)
Regional Hearing Clerk
US EPA, Region I
5 Post Office Square, Suite 100
Boston, MA 02109-3912
R1_Hearing_Clerk_Filings@epa.gov

Re: In the matter of Ardagh Glass Inc., Milford, MA;
Docket No. CWA-01-2015-0030

Dear Ms. Santiago:

Enclosed for filing please find Respondent Ardagh Glass Inc.'s *Motion for Extension of Time to File Answer* in connection with the above-referenced matter.

Sincerely,



Michelle M. Skjoldal

Enclosure

c: See Certificate of Service

Philadelphia

Boston

Washington, D.C.

Detroit

New York

Pittsburgh

Berwyn

Harrisburg

Orange County

Princeton

Wilmington

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

_____)	
In the matter of)	Docket No. CWA-01-2015-0030
)	
ARDAGH GLASS INC.)	MOTION FOR EXTENSION OF TIME
Milford, MA)	TO FILE ANSWER
)	
Respondent.)	
)	
Proposing to Assess a Civil Penalty)	
Under Section 309(g) of the Clean)	
Water Act, 33 U.S.C. § 1319(g))	
_____)	

Respondent Ardagh Glass Inc. ("AGI"), by and through its undersigned counsel, pursuant to 40 C.F.R. § 22.7(b), respectfully moves for an additional 30-day extension of time to file its answer to the Complaint and Notice of Opportunity for Hearing ("Complaint") in the above-captioned matter. AGI's answer is currently due to be filed on May 8, 2015, which is the deadline established by the April 6, 2015 Order granting an initial 30-day extension request. An additional 30-day extension would set a new filing deadline of June 8, 2015.

There is good cause for this second extension request. AGI and USEPA counsel met on April 27, 2015 at USEPA's Boston offices to discuss the Complaint and evaluate the possibility of resolving this matter through settlement. The parties have agreed to continue settlement discussions in the coming weeks.

Counsel for USEPA Region 1 has indicated that the agency does not oppose this extension request.

WHEREFORE, AGI requests that this 30-day extension request be granted and June 8, 2015, be established as the deadline for AGI to file its answer to the Complaint.

Dated: April 30, 2015



John W. Carroll
Michelle M. Skjoldal
PEPPER HAMILTON LLP
Suite 200, 100 Market Street
P.O. Box 1181
Harrisburg, PA 17108-1181
717.255.1155
717.238.0575 (fax)
carrollj@pepperlaw.com
skjoldalm@pepperlaw.com

Attorneys for Ardagh Glass Inc.

