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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

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2006 APR 10 PM 1:21

ENVIR. APPEALS BOARD

By Fax and First Class Mail

April 6, 2006

Eurika Durr, Clerk of the Board
Environmental Appeals Board
U.S. Environmental Protection Agency
MC 1103(B), Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460-0001

Re: Town of Rockland Wastewater Treatment Plant; Appeal Number NPDES 06-06

Dear Ms. Durr:

In connection with the above-referenced permit appeal, please find enclosed for docketing and review by the United States Environmental Protection Agency's ("EPA") Environmental Appeals Board (the "EAB"), a faxed copy of the parties' Joint Motion for Stay of the Proceedings. Region 1 is also today sending an original and five copies of this motion by first class mail to the EAB. As indicated in the Certificate of Service, a copy of this motion has been served on the Petitioner by fax and by first class mail.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Cynthia E. Liebman".

Cynthia E. Liebman
Assistant Regional Counsel
Office of Regional Counsel

cc w/ encl : Ms. Samantha Woods, Executive Director, North & South Rivers Watershed Association, at P.O. Box 43, Norwell, MA 02061

Director of Watershed Management, Attn: Mr. Glenn Haas, Massachusetts DEP,
One Winter Street, Boston, MA 02108

John Laughlin, Principal Executive Officer, Rockland Sewer Commission, P.O.
Box 330, Rockland, MA 02370

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**BEFORE THE ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY ENVIR. APPEALS BOARD
WASHINGTON, D.C.**

In the Matter of:)

Town of Rockland Wastewater)
Treatment Plant)

NPDES Permit No: MA0101923)
_____)

NPDES Appeal No. 06-06

JOINT MOTION FOR STAY OF THE PROCEEDINGS

Region I of the Environmental Protection Agency ("Region"), Respondent, and the North & South Rivers Watershed Association, Inc., Petitioner, respectfully submit to the Environmental Appeals Board ("Board") this Joint Motion for Stay of the Proceedings in the above-referenced appeal until June 20, 2006.

On January 26, 2006, EPA reissued a National Pollutant Discharge Elimination System ("NPDES") Permit, No. MA0101923 ("Permit"), to the Town of Rockland, Massachusetts Board of Sewer Commissioners authorizing wastewater discharges from the Rockland Wastewater Treatment Plant into the French Stream and establishing effluent limitations, monitoring requirements, and other conditions for such discharges. On March 1, 2006, the North & South Rivers Watershed Association filed a petition for review by the Board contesting the Permit's compliance schedule, effluent limitations for nutrients, and infiltration/inflow control plan. The Board directed the Region to submit a response by April 21, 2006 that addresses the Petitioner's contentions and whether the Petitioner has satisfied the requirements for obtaining review.

The parties believe that resolution of some or all of the issues in this appeal is possible

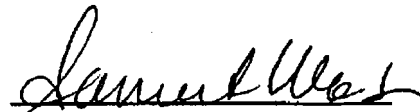
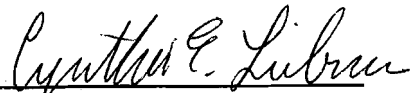
and have agreed to enter into settlement discussions. A settlement of some or all of the issues in this appeal will simplify or resolve the issues before the Board and thus conserve the Board's resources. Additionally, the EPA permit writer responsible for issuing the Permit was deployed on a temporary assignment to assist in EPA's hurricane response efforts in Louisiana, beginning on March 20. He is expected to return on April 12, 2006.

For the foregoing reasons, the Region and the North & South Rivers Watershed Association request a stay the proceedings before the Board in this case until June 20, 2006. On or as soon as possible before that date, the Parties will submit a status report to advise the Board whether it is appropriate to continue the stay, dismiss the Petition, or establish a schedule for EPA's response to the Petition.

Respectfully submitted,

United States EPA/Region I

North & South Rivers Watershed Association



Cynthia E. Liebman, Counsel
Office of Regional Counsel
US EPA Region 1 (SEL)
One Congress St. - Suite 1100
Boston, MA 02114-2023
Phone: (617) 918-1148
Fax: (617) 918-0148

Samantha Woods, Executive Director
North & South Rivers Watershed Association
P.O. Box 43
Norwell, MA 02061
Phone: (781) 659-8168
Fax: (781) 659-7915

Dated: April 6, 2006

Dated: April 5, 2006



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
ONE CONGRESS STREET SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

In re: Town of Rockland Wastewater Treatment Plant
Appeal Number NPDES 06-06

CERTIFICATE OF SERVICE

I hereby certify that on this 6th Day of April, 2006, EPA Region 1 served a true copy of the parties' Joint Motion for Stay of the Proceedings in the above-captioned matter on the following person:

By FAX and United States First Class mail to Ms. Samantha Woods, Executive Director, for the Petitioner, North & South Rivers Watershed Association, at P.O. Box 43, Norwell, MA 02061.

I further certify that on this 6th Day of April, 2006, EPA Region 1 filed an original and five copies of the parties' Joint Motion for Stay of the Proceedings in the above-captioned matter with the following person:

By FAX and United States First Class mail to the U.S. Environmental Protection Agency, Clerk of the Board, Environmental Appeals Board (MC 1103B) Ariel Rios Building 1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460-0001

Cynthia E. Liebman

Cynthia E. Liebman
Assistant Regional Counsel
U.S. EPA - Region 1
1 Congress Street, Suite 1100 (RAA)
Boston, MA 02114-2023
Tel: (617) 918-1148
Fax: (617) 918-0148

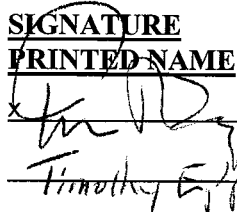
Date: April 6, 2006

** MAIL CARRIER:

10-Apr-06

CRITICAL MAIL TRACKING MODULE

MAIL CARRIER DELIVERY LOG from 04/10/2006 to 04/10/2006

<u>NAME/OFFICE</u>	<u>ROOM #</u>	<u>TRACKING #</u>	<u>DELIV DATE</u>	<u>SIGNATURE</u>
<u>CRITICAL MAIL ID #</u>	<u>MAIL CODE</u>	<u>CARRIER</u>	<u>TIME</u>	<u>PRINTED NAME</u>
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