

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

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| In the Matter of: |) | |
| |) | |
| VEOLIA ES TECHNICAL |) | |
| SOLUTIONS, L.L.C. |) | |
| |) | Appeal No.: CAA 17-02 |
| Permittee |) | |
| |) | |
| Air Pollution Control Title V |) | |
| Permit to Operate |) | |
| Permit No. V-IL-1716300103-2014-10 |) | |
| Docket No. U.S.EPA-R05-OAR-2014-0280 |) | |
| |) | |

JOINT MOTION FOR EXTENSION OF STAY

Permittee Veolia ES Technical Solutions, L.L.C. (“Veolia”) and Region 5 of the United States Environmental Protection Agency (“USEPA”), by and through their undersigned attorneys, respectfully move the Environmental Appeals Board (“Board”), for an order granting an extension of stay. In support of their motion to extend the stay, the parties state the following:

1. On May 15, 2017, the Board issued an Order (“May 15th Order”) staying this matter to May 26, 2017. The May 15th Order stated that the stay was issued to allow the parties to confirm that a settlement in principle had in fact been reached.
2. The Board’s May 15th Order further stated that to the extent the parties needed to seek a further stay of proceedings, that the parties must file a motion requesting a further stay by May 24, 2017.
3. Subsequent to the issuance of the Board’s May 15th Order, the parties reached and confirmed a settlement in principle that would completely resolve this pending matter.

4. The parties are now in the process of beginning to negotiate a formal settlement, including terms of a revised draft Title V renewal permit.
5. The parties believe an additional stay of **180 days** is necessary in order to facilitate the completion of a settlement.
6. The parties believe that this extension will provide them with enough time to complete the settlement process. If delays are experienced such that a further extension is necessary, the parties agree to promptly inform the Board via the filing of an appropriate motion.

WHEREFORE, the parties respectfully request that the EAB grant this Motion and extend the stay for 180 days up to and including **November 22, 2017**.

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| <p>Respectfully Submitted,</p> <p><u>/s/ Catherine Garypie</u> Catherine Garypie Office of Regional Counsel, Region 5 U.S. Environmental Protection Agency 77 W. Jackson Blvd. (C-14J) Chicago, IL 60604 312-886-5825 Garypie.catherine@epa.gov</p> | <p>Respectfully Submitted,</p> <p><u>/s/ Joseph M. Kellmeyer</u> Joseph M. Kellmeyer Ryan R. Kemper Sara L. Chamberlain Benjamin S. Harner Thompson Coburn LLP One US Bank Plaza St. Louis, Missouri 63101 314-552-6000 FAX 314-552-7000 jkellmeyer@thompsoncoburn.com rkemper@thompsoncoburn.com schamberlain@thompsoncoburn.com bharner@thompsoncoburn.com</p> <p><i>Attorneys for Permittee Veolia ES Technical Solutions, L.L.C.</i></p> |
|--|---|

/s/ John T. Krallman

John T. Krallman

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*Attorneys for the U.S. Environmental Protection
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CERTIFICATE OF SERVICE

I hereby certify, pursuant to the Rules of the Environmental Appeals Board of the U.S. Environmental Protection Agency, that on **May 24, 2017**, the foregoing was filed electronically with the Clerk of the Environmental Appeals Board using the EAB eFiling System, as authorized in the August 12, 2013, Standing Order titled Revised Order Authorizing Electronic Filing Procedures Before The Environmental Appeals Board Not Governed By 40 C.F.R. Part 22. The foregoing is also being served via U.S. Mail in hard copy paper form on the following:

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/s/ Joseph M. Kellmeyer
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