

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.

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ENVIRONMENTAL APPEALS BOARD

ENVIR. APPEALS BOARD

IN THE MATTER OF:)	
)	Appeal Numbers PSD 06-01
KNAUF INSULATION GmbH)	PSD 06-02
240 ELIZABETH STREET)	PSD 06-03
SHELBYVILLE, INDIANA)	PSD 06-04
PERMIT NO. NSR 4-4-4, SAC 03-01)	PSD 06-05
)	PSD 06-06
RESPONDENT)	

**KNAUF INSULATION GmbH's MOTION FOR LEAVE TO FILE
RESPONSE SEEKING SUMMARY DISPOSITION AND
MOTION TO DISMISS**

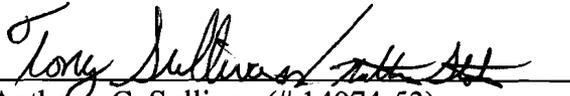
On behalf of Knauf Insulation GmbH ("Knauf"), this motion requests leave to file a response seeking summary disposition of the petitions for review filed with the Environmental Appeals Board (the "Board") by Henry Francis on June 12, 2006; jointly by Colleen Leavitt, Mary Scott, and Celeste Draisner on June 14, 2006; by Patricia Jiminez on June 14, 2006; by Joy Louise Newcom on June 19, 2006; by Serafin Jiminez on June 19, 2006; and by Joanna Caul on June 20, 2006. In support of this motion, Knauf states:

1. Knauf is the permittee to which Permit No. NSR 4-4-4, SAC 03-01 was issued, and for which these petitioners filed their petitions for review.
2. Knauf's interests are affected by petitioners' requests for review, and therefore, has an interest in the outcome of this matter.
3. As described in the accompanying motion, Knauf believes that none of these petitions satisfy the basic requirements of the applicable regulations, Board decisions, or the Board's Practice Manual, and therefore should be disposed of summarily.

4. Knauf has filed its Response Seeking Summary Disposition and Motion to Dismiss concurrently with this Motion for Leave.

WHEREFORE, Knauf Insulation GmbH respectfully requests that the Board grant it leave to file its Response Seeking Summary Disposition and Motion to Dismiss.

Respectfully submitted,


Anthony C. Sullivan (# 14974-53)
Barnes & Thornburg LLP
11 South Meridian Street
Indianapolis, Indiana 46204
Phone: (317) 231-7472

Attorney for Knauf Insulation GmbH

Certificate of Service

The undersigned hereby certifies that a copy of "Knauf Insulation GmbH's Motion for Leave to File a Response Seeking Summary Disposition" has been served this 11th day of July 2006, by depositing a copy of the same in the United States mail, first class postage prepaid and properly addressed to the following:

Henry Francis
13613 Jaybird Way
Redding, California 96003

Patricia Jiminez
13613 Jaybird Way
Redding, California 96003

Colleen Leavitt
P.O. Box 5538
Summit City, California 96089

Joy Louise Newcom
3702 Fujiyama Way
Redding, California 96001

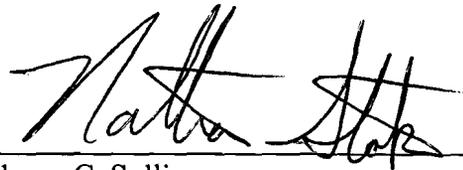
Mary Scott
12982 Beltline Road
Redding California 96003

Serafin Jiminez
13613 Jaybird Way
Redding, California 96003

Celeste Draisner
1000 Shepard Court
Redding, California 96002

Joanna L. Caul
21684 Elk Trl. W.
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Nancy J. Marvel
Office of Regional Counsel
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105



Anthony C. Sullivan

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PERMIT NO. NSR 4-4-4, SAC 03-01)	PSD 06-05
)	PSD 06-06
RESPONDENT)	

APPEARANCE

Comes now Anthony C. Sullivan and hereby enters his appearance for Knauf Insulation GmbH in the above-entitled action.

Respectfully submitted,



Anthony C. Sullivan (# 14974-53)

Barnes & Thornburg LLP
11 South Meridian Street
Indianapolis, Indiana 46204
Phone: (317) 231-7472

Attorney for Knauf Insulation GmbH

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The undersigned hereby certifies that a copy of "Appearance" has been served this 11th day of July 2006, by depositing a copy of the same in the United States mail, first class postage prepaid and properly addressed to the following:

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