

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

In the Matter of:

GVS North America, Inc.
63 Community Drive
Sanford, ME 04073

EPA ID No. MED980914451

Respondent

Docket No. RCRA-01-2017-0053

**MOTION FOR FURTHER EXTENSION
OF TIME IN WHICH TO ANSWER
THE ADMINISTRATIVE COMPLAINT**

Proceeding Under Section 3008(a) of the
Resource Conservation and Recovery Act,
42 U.S.C. §6928(a)

**MOTION FOR FURTHER EXTENSION OF TIME
IN WHICH TO ANSWER THE ADMINISTRATIVE COMPLAINT**

I. NEED FOR AN EXTENSION

Since GVS North America, Inc.'s ("Respondent") receipt of the Administrative Complaint and Notice of Opportunity to Request a Hearing in the above-captioned matter, it has provided information to and participated in a settlement meeting with EPA Senior Enforcement Counsel Kathleen Woodward. Settlement discussions have proceeded, and the complete Scope of Work for a Supplemental Environmental Project ("SEP") has been provided. Unfortunately, it will not be possible to execute all necessary settlement documents before the expiration of the current deadline to file an answer to the Complaint. For that reason, Respondent requests an additional fourteen (14) day extension of the deadline for filing an answer to the Complaint.

This extension is necessary in order to complete the settlement process. It would impose an unnecessary burden on the Respondent to require preparation of an answer to the Complaint if, as appears possible, settlement of this matter and full compliance with the relevant regulations can be achieved without having to do so. The requested fourteen (14) day extension should provide sufficient time to complete these settlement discussions.

Attorney Woodward has indicated that she has no objection to this request for an extension of time to answer the Complaint until April 13, 2018.

II. AUTHORITY TO GRANT AN EXTENSION

The Presiding Officer may grant an extension of time for filing any document, including a written answer to an administrative complaint, upon timely motion of a party to the proceeding, for good cause shown, and after consideration of prejudice to other parties, under the Consolidated Rules of Practice, 40 C.F.R. § 22.7(b). This motion is made sufficiently in advance of the extended due date of March 30, 2018, is intended to allow all parties to pursue settlement of this matter at an early stage of these proceedings and is not opposed by the EPA. For these reasons, Respondent's request complies with the requirements of 40 C.F.R. §22.7.

III. REQUEST FOR EXTENSION

There is no prejudice to any other party and there is good cause for an extension of time in which to file an answer to the Complaint. Therefore, the Respondent respectfully requests that the time for filing an answer to the Complaint be extended to April 13, 2018.

Respectfully Submitted,
GVS North America, Inc.
By its attorneys



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