

KENNETH F. GRAY

Merrill's Wharf
254 Commercial Street
Portland, ME 04101

P 207.791.1212
F 207.791.1350
kgray@pierceatwood.com
pierceatwood.com

Admitted in: MA, ME, NH

December 26, 2017

BY ELECTRONIC MAIL AND FIRST CLASS MAIL

Wanda I. Santiago, Regional Hearing Clerk
U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100 (Mailcode: ORC04-6)
Boston, MA 02109-3912

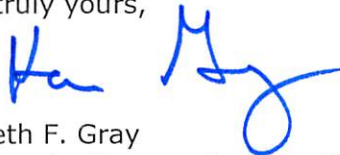
Re: In the Matter of Tasman Leather Group, LLC, Docket No. RCRA-01-2017-0054

Dear Ms. Santiago:

Enclosed for filing in the above-referenced matter are the original and one copy of an Assented to Motion for Extension of Deadline to File and an Answer and Request a Hearing and Certificate of Service.

Thank you, and please call with any questions.

Very truly yours,



Kenneth F. Gray
Attorney for Tasman Leather Group, LLC

Enclosures

cc: Norman Tasman, President, Tasman Leather Group, LLC
David Ernstburger, CPA and Chief Financial Officer, Tasman Industries
Sheldon Yoffe, Esq., Tasman Industries
Kevin P. Pechulis, Enforcement Counsel, EPA Region I
Timothy Williamson, Acting Regional Judicial Officer, EPA Region I

**United States Environmental Protection Agency
Region I**

IN THE MATTER OF:)	
)	
Tasman Leather Group, LLC)	
9 Main Street)	
Hartland, ME 04943)	Docket No.
)	RCRA-01-2017-0054
Respondent)	
)	
EPA I.D. No. MER000511501)	
)	ASSENTED TO MOTION FOR
Proceeding under Section 3008(a))	EXTENSION OF DEADLINE TO
)	FILE AN ANSWER AND
Resource Conservation and Recovery)	REQUEST A HEARING
Act, 42 U.S.C. § 6928(a))	
_____)	

Tasman Leather Group, LLC (“Respondent”) respectfully requests that the Regional Judicial Officer grant an additional 60 days extension of time to file an answer and request a hearing in the above-captioned matter, an enforcement action filed by the Legal Enforcement Manager of the Office of Environmental Stewardship, United States Environmental Protection Agency (“EPA”), Region 1 (“Complainant”).

Respondent received the Complaint, Compliance Order, and Notice of Opportunity for a Hearing (“Complaint”) on September 28, 2017. The due date for the answer and hearing request would be October 28, 2017 (a Saturday), with the result that the actual due date for the filing was the following business day, October 30, 2017. Respondent filed an Assented to Motion for Extension of Deadline until Friday, December 29, 2017; that motion was granted by Order of the Acting Regional Judicial Officer, LeAnn Jensen, dated November 27, 2017.

Respondent requests this extension for the following reasons:

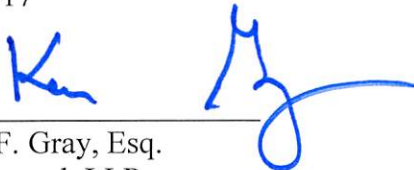
1. In November, Respondent filed the EPA-Ordered Statement of Compliance. On December 20th, Respondent met with EPA and participated in informal settlement discussions. The parties made progress in identifying issues in dispute, clarifying how EPA may address Respondent's inability to pay, and identifying other factual information to be supplied to EPA that may help resolve the matter.
2. Respondent is collecting information to submit to EPA that is expected to promote settlement, which may include further financial information.
3. After receiving such information, Complainant will require time to review that information. While Respondent believes that Complainant will review that information in an expeditious manner, Respondent is not able to estimate a date certain when that review will be complete. Further, any settlement negotiations and production of a final written Consent Agreement Final Order, including the internal EPA concurrence process and signature by the parties, will consume additional time.
4. Requiring Respondent to compose and file an Answer at this time will not expedite resolution of this matter, and will simply result in unnecessary costs for Respondent.
5. Respondent has conferred with the lead attorney for Complainant, Kevin P. Pechulis, and Mr. Pechulis has indicated Complainant assents to the motion for an extension of the deadline to file an answer and request a hearing for an additional 60 days beyond the initial deadline.

Accordingly, Respondent requests an extension to file an answer and request a hearing until Tuesday, February 27, 2017.

Respectfully submitted,

Date: December 26, 2017

Signed:



Kenneth F. Gray, Esq.
Pierce Atwood, LLP
Merrill's Wharf
254 Commercial Street
Portland, ME 04101
Phone: (207) 791-1212
Fax: (207) 791-1350
Email: kgray@pierceanwood.com

Attorney for Tasman Leather Group, LLC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Assented to Motion for Extension of Deadline to File an Answer and Request a Hearing was delivered in the following manner to the addresses listed below:

Original and One Copy by
First Class Mail, and
electronic transmission, to:

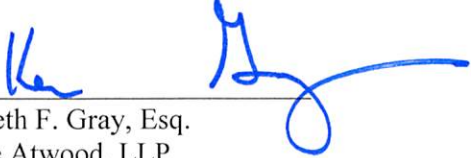
Wanda I. Santiago
Regional Hearing Clerk
EPA Region 1 – New England
5 Post Office Square, Suite 100 (ORC04-6)
Boston, MA 02109-3912

One Copy by First Class Mail,
and electronic transmission, to:

Kevin P. Pechulis
Enforcement Counsel
Office of Environmental Stewardship
U.S. EPA, Region 1
5 Post Office Square, Suite 100 (OES04-3)
Boston, MA 02109-3912

Date: December 26, 2017

Signed:



Kenneth F. Gray, Esq.
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