November 7, 2011



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VIA EXPRESS MAIL

Wanda Santiago Regional Hearing Clerk U.S. Environmental Protection Agency – Region I 5 Post Office Square, Suite 100 (ORA18-1) Boston, MA 02109-3912

Re: Second Request for Extension of Time to Answer Administrative Complaint Docket No. CWA-01-2011-0123

Dear Ms. Santiago:

Enclosed for filing in the above-referenced action, please find one original and one copy of a Second Request for Extension of Time to Answer Administrative Complaint and Opportunity to Request Hearing submitted by BOSFuel Corporation.

Landreth

AW FIRM

Regional Judicial Officer Metcalf previously approved a request for extension of time until December 2, 2011. Subsequent to that request and approval, the parties have determined that conflicts in schedules require additional time as more fully described in the attached pleading.

Sincerely,

Lloyd W. Landreth Environmental Counsel for BOSFuel Corporation

Enclosure

Via electronic mail

cc: Jill Metcalf, Regional Judicial Officer, EPA Region 1 Tonia Bandrowicz, Esq. – EPA Region 1 Dawn Oakley, Esq. - Swissport

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I

2011 NOV -8 P 3: 17

IN THE MATTER OF:

BOSFuel Corporation c/o American Airlines 4333 Amon Carter Blvd. Fort Worth, TX 75261

And

Swissport Fueling, Inc. 45025 Aviation Drive, Suite 350 Dulles, VA 20166 SECOND JOINT REQUEST FOR EXTENSION OF TIME CLERK TO ANSWER ADMINISTRATIVE COMPLAINT AND TO REQUEST HEARING

Docket No. CWA 01-2011-0123

Respondents

COME NOW Respondents BOSFuel Corporation ("BOSFuel") and Swissport Fueling, Inc. ("Swissport") (collectively, "Respondents"), and respectfully apply to Regional Judicial Officer Jill Metcalf for an extension of time to Answer the Administrative Complaint in this matter until January 20, 2012.

In support of its Request, Respondents state as follows:

1. Respondents' first request for extension of time until December 2, 2011 was granted by the Regional Judicial Officer on October 20, 2011. The initial request for an extension of time was in-part for the purpose of scheduling a meeting among all interested parties to discuss the issues raised in the Administrative Complaint.

2. Scheduling the meeting required coordination among a large number of agency personnel and Respondents. Agency attendees will include representatives of EPA, the U.S. Coast Guard, Massachusetts Department of Environmental Protection, and Massport.

3. Despite best efforts otherwise, the scheduling conflicts of all parties resulted in December 1, 2011 as the first available meeting date to discuss the facts of the matter and possible resolution of the issued raised.

4. Due to business travel, the upcoming holiday season and vacation schedules of the parties subsequent to the December 1, 2011 meeting, extending the deadline to answer the Administrative Complaint until January 20, 2012 will allow the parties sufficient time to engage in meaningful settlement discussions after attending the December 1st meeting.

5. Senior Enforcement Counsel for the U.S. Environmental Protection Agency – Region I, Tonia Bandrowicz, Esq. has been contacted and has agreed to this requested extension.

6. This requested extension of time is made for good cause and not for purpose of delay.

WHEREFORE, Respondents BOSFuel Corporation and Swissport Fueling, Inc. request Regional Hearing Officer Jill Metcalf grant a second Extension of Time to Answer the Administrative Complaint and to Request Hearing until January 20, 2012.

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Respectfully, submitted,

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Lloyd W. Landreth Landreth Law Firm 801 East B Street Jenks, Oklahoma 74037-4307 Telephone: 918.296.0460 Facsimile: 918.296.0404 Email: llandreth@landrethlaw.com

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Dawn Oakley Secretary and General Counsel Swissport Fueling, Inc. 45025 Aviation Drive, Suite 350 Dulles, VA 20166 Telephone: 703-742-4319 Facsimile: 703-742-4342 Email: dawn.oakley@swissport.com

CERTIFICATE OF MAILING

I certify that on the 1^{+4} day of November, 2011, a true and correct copy of the foregoing instrument was placed in the United States Mail, postage prepaid, to:

Wanda Santiago Regional Hearing Clerk U.S. Environmental Protection Agency – Region I 5 Post Office Square, Suite 100 (ORA18-1) Boston, MA 02109-3912

sucheth.