

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2**

In the Matter of:

**Tri-Stella Development Group, Inc.**  
P.O. Box 11918  
Caparra Heights Station  
San Juan, Puerto Rico 00926

and

**Dynamics Engineers, Corp.**  
P.O. Box 1581  
Trujillo Alto, Puerto Rico 00977

**Camino Verdes II Development**

**RESPONDENTS**

Docket No. CWA-02-2011-3454

Proceeding Pursuant to § 309(c) of the  
Clean Water Act, 33 U.S.C. § 119(c)  
to Assess Class II Civil Penalty

U.S. ENVIRONMENTAL PROTECTION AGENCY  
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REGIONAL HEARING CLERK OFFICE

**MOTION REQUESTING EXTENSION OF TIME TO FILE ANSWER TO  
ADMINISTRATIVE COMPLAINT AND OTHERS**

**TO THE REGIONAL HEARING CLERK:**

COMES NOW, Dynamics Engineers, Corp. (“DEC”), hereby represented by the undersigned attorney, and respectfully states and prays:

1. That on July 28<sup>th</sup>, 2011, the U.S. Environmental Protection Agency, Region 2 (“EPA” or the “Complainant”) issued an “*Administrative Complaint, Findings of Violation, Notice of Proposed Assessment of a Civil Penalty, and Noticed of Opportunity to Request a Hearing*” (the “Complaint”), which was received by Respondent DEC on July 29<sup>th</sup>, 2011.
2. That despite our best efforts to finalize DEC’s response to the Complaint, due to the unforeseen circumstances caused by the tropical storm Irene and the power shortage and damages suffered by our law offices, we have not been able to finish the document nor gather all the

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information in support of such. Therefore, DEC will not be able to file its response within the 30 day term provided due next Monday, August 29<sup>th</sup>, 2011.

3. That we have consulted with Héctor L. Vélez Cruz, Office of the Regional Counsel, EPA Region 2, whom has expressed no objection to a time extension of 5 additional days for filing DEC's response to the Complaint.

4. Although DEC fully understands the importance of complying with the terms provided by EPA, we are still gathering all the information necessary in order to submit an appropriate response.

WHEREFORE, we respectfully request that the EPA grant DEC an additional period of 5 working days to submit DEC's reponse.

RESPECTFULLY submitted this 26th day of August 2011.

**CERTIFICATE OF SERVICE**

I hereby certify that on this same day, a true and correct copy of this motion was sent upon the Assistant Regional Counsel for EPA by courier addressed to:

Héctor Vélez Cruz, Esq.  
Assistant Regional Counsel  
Office of Regional Counsel-Caribbean Team  
U.S. Environmental Protection Agency, Region 2  
Centro Europa Building Suite 207  
1492 Ponce de León Avenue  
San Juan, Puerto Rico 00907-4127

The original and a copy of this motion were sent on this same date via certified mail to the EPA Region 2 Regional Hearing Clerk's Office at 290 Broadway Avenue, 17<sup>th</sup> Floor, New York, New York 10007-1966, Attention: Ms. Karen Maples at [maples.karen@epa.gov](mailto:maples.karen@epa.gov).

**TORO, COLON, MULLET, RIVERA & SIFRE, P.S.C.**

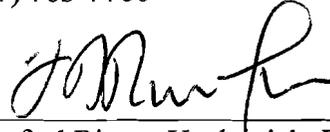
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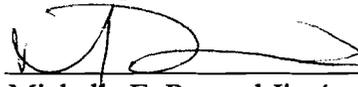
By:



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Rafael Rivera Yankovich, Esq.  
rryanko@tcmrslaw.co.

By:



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