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NOV 20 2015

EPA ORC
Office of Regional Hearing Clerk

November 19, 2015

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

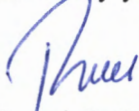
Re: **In the Matter of: Waters Technologies Corporation**
Docket No: RCRA-01-2015-0084

Dear Ms. Santiago:

Please find enclosed for filing an original and one copy of Waters Technologies Corporation's Motion for Extension to File Answer in the above referenced matter.

Please do not hesitate to contact me should you have any questions.

Sincerely yours,



Bonni F. Kaufman

Cc: Steven Schlang
LeAnn Jensen

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I**

In the Matter of:) **EPA Docket No. RCRA-01-2015-0084**
)
Waters Technologies Corporation,)
177 Robert Treat Paine Drive)
Taunton, MA 02780)
)
Respondent.)

**MOTION OF WATERS TECHNOLOGIES CORPORATION FOR EXTENSION TO
FILE ANSWER**

Pursuant to 40 C.F.R. §22.7(b), Respondent, Waters Technologies Corporation, by counsel, respectfully moves the Regional Judicial Officer to extend its deadline to file an Answer in the above referenced matter to January 6, 2016. In support of this motion, Water Technologies provides the following:

1. On October 28, 2015, Complainant filed an Administrative Complaint and Compliance Order (“Complaint”) in this matter alleging that Waters Technologies violated the Resource Conservation and Recovery Act (RCRA) and the Massachusetts federally authorized hazardous waste regulations.
2. The Complaint is 50 pages long and contains numerous detailed allegations. Waters Technologies is evaluating the Complaint and has retained a specialized environmental consulting firm to assist in preparation of the Answer.
3. Counsel for Waters Technologies discussed an extension to file an Answer to the Complaint with Steven Schlang, Senior Enforcement Attorney, EPA Region 1, and Mr. Schlang agreed to Waters Technologies’ request for an extension until January 6, 2016. This extension will provide Waters Technologies sufficient time to complete its internal evaluation.
4. An extension to January 6, 2016 will also provide the Parties additional time to discuss potential settlement or resolution of the Complaint without expending resources on drafting an Answer to the Complaint.
5. By this filing, Waters Technologies does not admit any liability for any of the allegations in the Complaint and reserves its right to file an Answer.
6. There are no other parties in this proceeding other than USEPA and Waters Technologies.

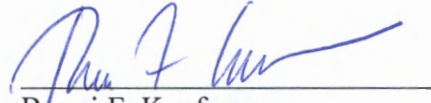
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Respectfully submitted,

Waters Technologies Corporation
By Its Counsel



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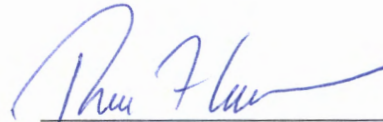
CERTIFICATE OF SERVICE

I certify that on this 19th day of November, 2015, the foregoing Motion of Waters Technologies Corporation for Extension of Time to File Answer was sent to the following persons, by first class mail and UPS Overnight:

Wanda Santiago
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