

**United States Environmental Protection Agency
Region I**

In the Matter of:)	
)	
WASH SAFE INDUSTRIES, INC.)	Docket Number
)	FIFRA-01-2012-0083
400 Tubman Road)	
Brewster , MA 02631)	
Respondent.)	
)	
)	

MOTION TO EXTEND TIME TO ANSWER

Respondent, Wash Safe Industries (“Respondent”) hereby moves pursuant to 40 C.F.R. §§ 22.7(b) and 22.16(a) for an extension of time to file an answer and a written request for a hearing in this matter.

Respondent calculates that such filing presently is due on or about October 27, 2012. As grounds for this motion, Respondent states that it requires time to submit information to support a financial hardship claim, for EPA analysis of that financial information, and for the parties to continue to engage in settlement discussions. EPA counsel has indicated that the Agency is amenable to this extension request.

Wherefore, Respondent respectfully requests a 30-day extension, i.e., to November 27, 2012, to file an answer and a written request for a hearing in this matter.

Respectfully submitted,

WASH SAFE INDUSTRIES, INC.

Respondent,

By its attorney,



Donald P. Nagle, Esq. (BBO # 553544)
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207 Front Street
Scituate, Massachusetts 02066
(781) 378-1048

Date: October 19, 2012

CERTIFICATE OF SERVICE

I, Donald Nagle, hereby certify that on October 19, 2012, I served a copy of the foregoing by first class mail to the following:

John Hultgren
Enforcement Counsel
Office of Environmental Stewardship
U. S. Environmental Protection Agency
5 Post Office Square – Suite 100 (OES04-2)
Boston, MA 02109-3912



Donald P. Nagle