January 16, 2025 1:35 pm USEPA – Region II Regional Hearing Clerk



THE CITY OF NEW YORK LAW DEPARTMENT 100 CHURCH STREET NEW YORK, NY 10007

Christopher Gene King Phone: 212-356-2074 Email: cking@law.nyc.gov

January 16, 2025

VIA EMAIL TO:

MURIEL GOODE-TRUFANT

Acting Corporation Counsel

Helen Ferrara Regional Judicial Officer U.S. Environmental Protection Agency 290 Broadway – 17th Floor New York, NY 100007 email: ferrara.helen@epa.gov

> Re: Notices of Proposed Assessments of Civil Penalty New York City Economic Development Corp. Docket Nos. MPRSA 02-2025-60002, MPRSA 02-2025-6003

Dear Ms Ferrara:

We are in receipt of the above-referenced notices of prosed penalty assessments which were sent by mail to the New York City Economic Development Corporation (NYCEDC). We are in the process of reviewing the specific allegations contained in the complaints in consultation with NYCEDC and its contractors. In order to thoroughly explore the possibility of a settlement of this matter with the USEPA, on behalf of NYCEDC, we request an extension of time to respond to the complaints until February 20th, 2025.

Thank you for your consideration of this request.

Respectfully your Christopher Gene King Senior Counsel Environmental Law Division

cc (via email):

Karen Maples Regional Hearing Clerk U.S. Environmental Protection Agency 290 Broadway -17th Floor New York, NY 10007 email: <u>maples.karen@epa.gov</u>

Zoe Oldham Asst. Regional Counsel Water and General Law Branch U.S. Environmental Protection Agency 290 Broadway – 16th Floor New York, NY 10007 email: <u>Oldham.zoe@epa.gov</u>