

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region 2

In the matter of:

TAPI Puerto Rico, Inc.

Respondent

Docket No. CAA-02-2011-1204

U.S. ENVIRONMENTAL  
PROTECTION AGENCY-REG. II  
2012 APR 23 P 2:44  
REGIONAL HEARING  
CLERK

**JOINT MOTION REQUESTING STAY IN PROCEEDINGS**

**TO THE HONORABLE PRESIDING OFFICER:**

**COMES NOW**, Complainant, the Environmental Protection Agency (“EPA”) and Respondent, TAPI Puerto Rico, Inc. (“TAPI”), through the undersigned attorneys, and very respectfully inform, state and pray as follows:

1. On March 5, 2012, the Parties filed a Joint Motion Requesting Stay in the Proceedings until April 5, 2012 to allow for the preparation of a mutually acceptable consent agreement and final order (“CA/FO”) relative to the case.
2. On March 22, 2012, the EPA presented TAPI its proposed CA/FO terms. On March 28, 2012, Respondent proposed a number of modifications to the suggested language of the CA/FO.
3. On April 2, 2012, the Parties filed a Joint Motion Requesting a Stay in the Proceedings until April 20, 2012, to allow for the finalizing of the CA/FO after the Easter Holiday break.
4. The Parties resumed negotiations after the Easter Holiday, and are currently in the concurrence process for the CA/FO.

5. The Parties understand that ten (10) additional days would be sufficient to finalize the CA/FO and to obtain all the necessary concurrences associated theretofore.

6. The Parties understand that there is no undue delay, bad faith or dilatory motive that can affect the Parties' rights under law, and there is no prejudice or additional burden as a result of the stay in the proceedings herein requested.

7. In view of the foregoing, the Parties jointly request the Honorable Presiding Officer to stay the proceedings until April 30, 2012, to allow the Parties to file the CA/FO.

**WHEREFORE**, The Parties respectfully request this Honorable Presiding Officer to take notice of the aforementioned and, consequently, to stay the proceedings until April 30, 2012.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 20<sup>th</sup> day of April, 2012.

**UNITED STATES ENVIRONMENTAL  
PROTECTION AGENCY**

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2

IN THE MATTER OF:

**TAPI Puerto Rico, Inc.**

**DOCKET NUMBER CAA-02-2011-1204**

**RESPONDENT**

Proceeding under Section 113  
of the Clean Air Act, 42 U.S.C. § 7413

CERTIFICATE OF SERVICE

I certify that I have this day caused to be sent the foregoing **JOINT MOTION REQUESTING STAY IN PROCEEDINGS**, dated April 20, 2012, and bearing the above-referenced docket number, in the following manner to the respective addressees below:

Original and copy by facsimile, **Overnight Mail** to:

**Karen Maples**  
Regional Hearing Clerk  
Region II  
U.S. Environmental Protection Agency  
290 Broadway, 16<sup>th</sup> Floor  
New York, NY 10007-1866  
Fax (212) 637-3202.

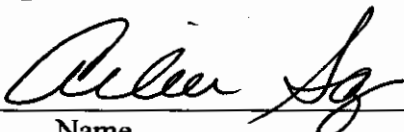
Copy by facsimile, **Overnight Mail** to:

Attorney for Respondent:  
**Gretchen Méndez-Vilella, Esq.**  
Goldman Antonetti & Córdova, P.S.C.  
American International Plaza, 14<sup>th</sup> Floor  
250 Muñoz Rivera Avenue  
San Juan, P.R. 00918  
Telephone 787-759-8000  
Fax 787-474-2407

Copy by facsimile, **Overnight Mail** to:

Chief Administrative Law Judge  
**Honorable Susan L. Biro**  
Office of Administrative Law Judges,  
U.S. Environmental Protection Agency  
1099 14<sup>th</sup> Street, N.W., Suite 350, Washington, D.C. 20005  
Fax (202) 565-0044.

April 20, 2012  
Date

  
Name