

The logo for Pierce Atwood LLP, featuring the company name in a bold, sans-serif font with a stylized graphic element above the 'A'.**KENNETH F. GRAY**Merrill's Wharf  
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Admitted in: MA, ME, NH

**RECEIVED**EPA ORC *WS*  
Office of Regional Hearing Clerk

February 26, 2018

**BY ELECTRONIC MAIL AND FIRST CLASS MAIL**Wanda I. Santiago, Regional Hearing Clerk  
U.S. Environmental Protection Agency, Region I  
5 Post Office Square, Suite 100 (Mailcode: ORC04-6)  
Boston, MA 02109-3912

Re: In the Matter of Tasman Leather Group, LLC, Docket No. RCRA-01-2017-0054

Dear Ms. Santiago:

Enclosed for filing in the above-referenced matter are the original and one copy of an Assented to Motion for Extension of Deadline to File and an Answer and Request a Hearing and Certificate of Service.

Thank you, and please call with any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Ken'.Kenneth F. Gray  
Attorney for Tasman Leather Group, LLC

Enclosures

cc: Norman Tasman, President, Tasman Leather Group, LLC  
David Ernstburger, CPA and Chief Financial Officer, Tasman Industries  
Sheldon Yoffe, Esq., Tasman Industries  
Kevin P. Pechulis, Enforcement Counsel, EPA Region I

**United States Environmental Protection Agency  
Region I**

IN THE MATTER OF: )  
 )  
 Tasman Leather Group, LLC )  
 9 Main Street )  
 Hartland, ME 04943 )  
 Respondent )  
 )  
 EPA I.D. No. MER000511501 )  
 )  
 Proceeding under Section 3008(a) )  
 )  
 Resource Conservation and Recovery )  
 Act, 42 U.S.C. § 6928(a) )  
 \_\_\_\_\_ )

Docket No.  
RCRA-01-2017-0054

**ASSENTED TO MOTION FOR  
EXTENSION OF DEADLINE TO  
FILE AN ANSWER AND  
REQUEST A HEARING**

Tasman Leather Group, LLC ("Respondent") respectfully requests that the Regional Judicial Officer grant an additional 45 days extension of time to file an answer and request a hearing in the above-captioned matter, an enforcement action filed by the Legal Enforcement Manager of the Office of Environmental Stewardship, United States Environmental Protection Agency ("EPA"), Region 1 ("Complainant").

Respondent received the Complaint, Compliance Order, and Notice of Opportunity for a Hearing ("Complaint") on September 28, 2017. Respondent and Complainant have agreed to two extensions, the most recent expiring Tuesday, February 27, 2018.

Respondent requests this extension for the following reasons:

1. In November, Respondent filed the EPA-Ordered Statement of Compliance. On December 20, 2017, Respondent met with EPA and participated in informal settlement

discussions. The parties made progress in identifying issues in dispute, clarifying how EPA may address Respondent's inability to pay, and identifying other factual information to be supplied to EPA that may help resolve the matter.

2. After the first extension, Respondent collected information and submitted that to EPA, which has resulted in a better understanding of each other's positions, and has resulted in counteroffers by each party, moving the parties closer to settlement. The most recent settlement discussions occurred on Friday, February 23<sup>rd</sup>, but have not resulted in an agreement in principle.

3. As a result of the good faith efforts of both parties, as well as the results of the negotiation to date, Complainant and Respondent believe that a settlement may still be possible, but additional time is necessary to reach a settlement.

4. Further, any settlement negotiations and production of a final written Consent Agreement Final Order, including the internal EPA concurrence process and signature by the parties, will consume additional time.

4. Requiring Respondent to compose and file an Answer at this time will not expedite resolution of this matter, and will simply result in unnecessary costs for Respondent, which both parties wish to avoid.

5. While Complainant and Respondent might prefer to request a shorter extension, Respondent's decision-maker (the President of Respondent) will be travelling outside the United States on business and without access to reliable, secure communication for a substantial portion of the next six weeks. Accordingly, a 45-day extension is requested.

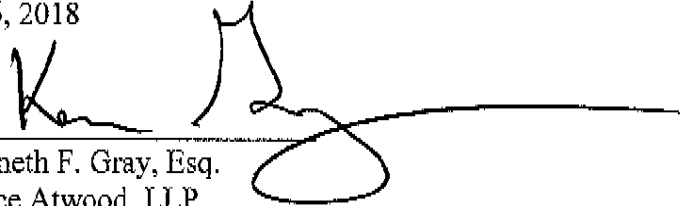
6. Respondent has conferred with the lead attorney for Complainant, Kevin P. Pechulis, and Mr. Pechulis has indicated Complainant assents to the motion for an extension of the deadline to file an answer and request a hearing for an additional 45 days beyond the February 27<sup>th</sup> deadline.

Accordingly, Respondent requests an extension to file an answer and request a hearing until Friday, April 13, 2018.

Respectfully submitted,

Date: February 26, 2018

Signed:



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Attorney for Tasman Leather Group, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Assented to Motion for Extension of Deadline to File an Answer and Request a Hearing was delivered in the following manner to the addresses listed below:

Original and One Copy by  
First Class Mail, and  
electronic transmission, to:

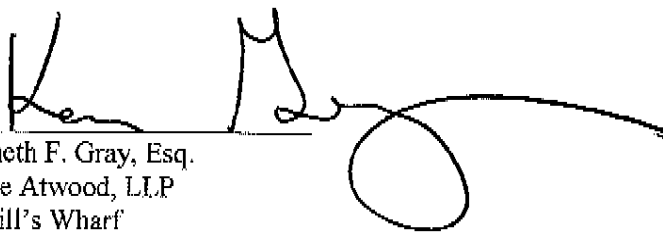
Wanda I. Santiago  
Regional Hearing Clerk  
EPA Region 1 - New England  
5 Post Office Square, Suite 100 (ORC04-6)  
Boston, MA 02109-3912

One Copy by First Class Mail,  
and electronic transmission, to:

Kevin P. Pechulis  
Enforcement Counsel  
Office of Environmental Stewardship  
U.S. EPA, Region 1  
5 Post Office Square, Suite 100 (OES04-3)  
Boston, MA 02109-3912

Date: February 26, 2018

Signed:

  
\_\_\_\_\_  
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