

**VanNess
Feldman**
ATTORNEYS AT LAW

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EPA ORC
Office of Regional Hearing Clerk

A PROFESSIONAL CORPORATION
1050 Thomas Jefferson Street, N.W.
Washington, D.C. 20007-3877
(202) 298-1800 Telephone
(202) 338-2416 Facsimile

Seattle, Washington
(206) 623-9372

Kaitlin Gregg
(202) 298-1909
kag@vnf.com

July 11, 2012

VIA UNITED PARCEL SERVICE

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency
Region 1 (ORA 18-1)
5 Post Office Square
Boston, MA 02109

Re: In the Matter of Northland Environmental, LLC and PSC Environmental Services, LLC
Docket No. RCRA-01-2012-0028

Dear Ms. Santiago:

Enclosed for filing in the above-referenced matter please find the original and one copy of an Unopposed Motion for Third Extension of Time to File an Answer and to Request a Hearing.

Thank you for your attention to this matter.

Sincerely,



Kaitlin A. Gregg

Counsel for Northland Environmental, LLC
and PSC Environmental Services, LLC

Enclosures

cc: Andrea Simpson, Esq. (via UPS) (w/encl.)

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1**

RECEIVED

JUL 12 2012

EPA ORC *ijs*
Office of Regional Hearing Clerk

In the Matter of:)
)
Northland Environmental, LLC)
275 Allens Avenue)
Providence, RI 02905)
)
PSC Environmental Services, LLC)
5151 San Filipe Street, Suite 1600)
Houston, TX 77056)
)
Respondents)
)
Proceeding under Section 3008(a))
Resource Conservation and Recovery)
Act, 42 U.S.C. § 6928(a))
_____)

Docket No.
RCRA-01-2012-0028

**UNOPPOSED MOTION FOR
THIRD EXTENSION OF TIME
TO FILE AN ANSWER AND
TO REQUEST A HEARING**

Pursuant to 40 C.F.R. §§ 22.7 and 22.16, Respondents Northland Environmental, LLC and PSC Environmental Services, LLC (collectively, "Respondents") respectfully move for a third extension of time to file an answer to the complaint and to request a hearing in this matter.

Respondents request a 45 day extension, until September 2, 2012. Because September 2 falls on a Sunday, and Monday, September 3 is a holiday, Respondents request that the answer and request for hearing be due on Tuesday, September 4.

In support of this motion, Respondents state as follows:

1. Respondents received an initial extension of time to file an answer to the complaint and to request a hearing, moving the deadline to June 4, 2012.
2. Respondents engaged in an initial settlement conference with staff at EPA Region 1 on May 3, 2012.
3. Respondents requested a second extension of time to file an answer to the complaint while the settlement process continued. Such request was granted and the date was moved to July 19, 2012.

4. Respondents engaged in a second settlement conference with staff at EPA Region 1 on July 3, 2012, and settlement discussions are ongoing.


5. An additional extension of time of 45 days to file an answer and to request a hearing will allow Respondents to continue to focus their resources on the settlement process in the immediate term, and will still provide sufficient time to prepare an answer if settlement negotiations do not progress to the satisfaction of either party.

6. Respondents are authorized to represent that counsel for Complainant assents to this motion.

WHEREFORE,

Respondents respectfully request that the deadline for Respondents to file an answer and to request a hearing in this matter be extended to and including September 4, 2012.

Dated: July 11, 2012



Kaitlin A. Gregg

Van Ness Feldman

1050 Thomas Jefferson St. NW, Suite 700

Washington, DC 20007-3877

Counsel for Northland Environmental, LLC
and PSC Environmental Services, LLC

CERTIFICATE OF SERVICE

I hereby certify that on that date noted below, the foregoing Unopposed Motion for Third Extension of Time to File an Answer and to Request a Hearing was sent to following parties via United Parcel Service, as set forth below:

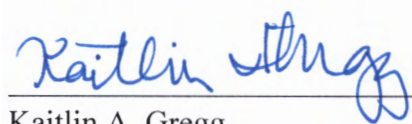
Original and one copy:

Wanda Santiago
Regional Hearing Clerk
U.S. EPA, Region 1 (ORA 18-1)
5 Post Office Square, Suite 100
Boston, MA 02109

Copy:

Andrea Simpson, Esq.
Senior Enforcement Counsel
U.S Environmental Protection Agency
Region 1
5 Post Office Square, Suite 100
Boston, MA 02109

Dated: July 11, 2012



Kaitlin A. Gregg
Van Ness Feldman
1050 Thomas Jefferson St NW, Suite 700
Washington, DC 20007

Counsel for Northland Environmental, LLC
and PSC Environmental Services, LLC