

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2

U.S. ENVIRONMENTAL  
PROTECTION AGENCY-REG.II

2012 JUN -4 P 3 44

REGIONAL HEARING  
CLERK

IN THE MATTER OF:

**TAPI Puerto Rico, Inc.**

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

DOCKET NUMBER CAA-02-2011-1204

**Motion Requesting Extension of Time to File CA/FO**

COMES NOW Complainant, the U.S. Environmental Protection Agency ("EPA" or "Complainant") through the undersigned attorney, and respectfully alleges, prays and requests as follows:

1. On May 21, 2011, the Parties submitted a Joint Motion requesting an additional extension of ten (10) additional days to file the CA/FO. The Parties understood that, no further extension would be necessary, since we expected to be able to file the fully executed CA/FO within the period of time requested.
2. On May 30, 2012, the Parties finally reached an agreement regarding the language of the CA/FO. That same day, Respondent signed the document.
3. However, the extensive process of concurrence, which involves the signature of several persons both in Puerto Rico and New York, has not concluded.
4. Furthermore, Counsel for Complainant has not been able to dedicate all the necessary efforts to complete this process, due to medical reasons, which have kept her away from the office.
5. Complainant recognizes that it is in the best interest of all the parties involved to file the CA/FO as soon as possible. Therefore, all efforts are being made in order to expedite the

concurrency process of the remaining officials.

6. Since the process of concurrence and signature to file a fully executed CA/FO has not been completed, Complainant respectfully requests a final extension of ten (10) additional days to submit the fully executed CA/FO.
7. The granting of ten (10) additional days to file the duly executed CA/FO will not result in prejudice to Respondent.

#### **Certificate of Service**

I hereby certify that a true copy of this Status Report was served to: Gretchen Méndez, Esq., P.O. BOX 70364, San Juan, Puerto Rico, 00936-8364.

Respectfully submitted, in Guaynabo, Puerto Rico, this 1<sup>st</sup> day of June, 2011.



**Carolina Jordan-García, Esq.**  
Office of Regional Counsel - Caribbean Team  
U.S. Environmental Protection Agency - Region 2  
Centro Europa Bldg., Suite 417  
1492 Ponce de León Ave.  
San Juan, PR 00907-4127  
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II

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 *MOTION*, dated June 1<sup>st</sup>, 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.

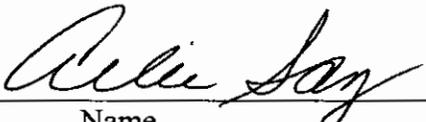
Copy by facsimile, **Overnight Mail** to:

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. Bió**  
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.

June 1, 2012  
Date

  
Name