

October 28, 2010

VIA FEDERAL EXPRESS

Tracking Number: 8663 4203 9294

Regional Hearing Clerk (E-19J)
U.S. EPA, Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

RECEIVED
OCT 29 2010

**REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY**

Re: I.D. Number: ILD 044 225 050
Reliable Galvanizing Company
8800 South Genoa Avenue
Chicago, Illinois 60620
Docket No. RCRA-05-2010-0026

MOTION FOR EXTENSION OF TIME IN WHICH TO FILE ANSWER

To Whom It May Concern:

A Complaint and Compliance Order ("Complaint") was filed with the above-indicated Reliable Galvanizing Company on October 4, 2010. The Complaint asked for a 30-day response in the form of an Answer to the Complaint.

The purpose of this correspondence is to make a first-time request for a 45-day extension to filing the Answer in order to prepare a response on behalf of the Respondent. The Complainant's Counsel agrees with the 45-day extension request.

Enclosed is one original and one copy of a Motion for Extension of Time in Which to File Answer along with a signed certificate of service. If you have any questions concerning this request or would like additional information, please do not hesitate to contact me at (815) 877-7530. Thank you for your assistance in this matter.

Sincerely

ENVIRONMENTAL COMPLIANCE CONSULTING, LTD.



Thomas J. McNamee
President

TJM/ds
Enclosure (1)

cc: Mr. Andre Daugavietis/U.S. EPA (Region V) – Assistant Regional Counsel (via Fed Ex)
Ms. Marcey Toney/U.S. EPA (Region V) – Regional Presiding Officer (via Fed Ex)
Mr. Michael Eisner/Reliable Galvanizing Company (via U.S. Standard Mail)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:)
)
Reliable Galvanizing Company)
Chicago, Illinois,)
)
Respondent.)
_____)

Docket No. RCRA-05-2010-0076

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REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY

MOTION FOR EXTENSION OF TIME IN WHICH TO FILE ANSWER

Pursuant to 40 C.F.R. § 22.7(b), Respondent Reliable Galvanizing Company (“Reliable”), by representing consultant, respectfully moves for an extension in which to file an Answer, and in support thereof state as follows:

1. The Complaint and Compliance Order in this matter was served on Reliable on October 4, 2010, making their answer due November 3, 2010.
2. Reliable and the undersigned consultant are preparing an informal written response to a conference held at U.S. EPA Region V office on October 7, 2010.
3. Reliable’s intent is to resolve the matter in an informal settlement negotiation prior to filing an Answer to the Complaint.
4. Due to the time needed to prepare a written response to the conference held on October 7, 2010, engage in an informal settlement negotiation, and prepare an Answer to the Complaint, Reliable and the undersigned consultant need and respectfully request an extension in which to file their Answer to the Complaint.
5. Reliable requests a forty-five (45) day extension, making their answer due on December 20, 2010.
6. Counsel for U.S. EPA Region V has agreed to the 45-day extension.

WHEREFORE, Reliable Galvanizing Company respectfully requests a 45-day extension until December 20, 2010 in which to file it’s Answer to the Complaint.



Thomas J. McNamee, President
Environmental Compliance Consulting, Ltd.
334 East Riverside Boulevard
Rockford, Illinois 61111
Telephone: (815) 877-7530
Facsimile: (815) 877-5630
e-mail: eccltd@comcast.net

RELIABLE GALVANIZING COMPANY
By Consultant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Respondent's Motion for Extension of Time in Which to File Answer was served, by Federal Express, Tracking Number 8663 4203 9294, upon the Regional Hearing Clerk (E-19J), U.S. EPA, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604, this 28th day of October, 2010;

and by Federal Express to:

Mr. Andre Daugevietis, Esquire (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604
Tracking Number: 8663 4203 9272

Ms. Marcey Toney, Esquire (C-14J)
Regional Presiding Officer
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604
Tracking Number: 8663 4203 9283

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and by first-class mail to:

Mr. Michael Eisner
Reliable Galvanizing Company
819 West 88th Street
Chicago, Illinois 60620



Thomas J. McNamee, President
Environmental Compliance Consulting, Ltd.
334 East Riverside Boulevard
Rockford, Illinois 61111