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January 3, 2013

VIA FEDERAL EXPRESS

Hon. Helen S. Ferrara
Regional Judicial Officer
U.S. Environmental Protection Agency
290 Broadway, 16th Floor
New York, New York 10007-1866

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG.11
2013 JAN -4 P 12:00
REGIONAL HEARING
CLERK

Re: *United Refining Company – Docket No. RCRA-02-2012-7504*
Request for Additional Extension

Dear Judge Ferrara:

By Order dated October 25, 2012, the U.S. Environmental Protection Agency extended the time for United Refining Company (“URC”) to answer the Complaint, Compliance Order and Notice of Opportunity for Hearing (the “Complaint”) in the referenced matter until January 3, 2013.

This letter is submitted to request an additional extension of time to answer the Complaint. Specifically, URC respectfully requests an extension until February 4, 2013 (30 days would be February 2, which is a Saturday), to serve an answer to the Complaint and, if necessary, to request a hearing in this matter. In support of this request, URC states that on November 27, 2012, it participated in an informal conference with EPA. Subsequent to the informal conference, on December 17, 2012, URC submitted further information to EPA for consideration in this matter. Given the intervening holidays, URC understands EPA is continuing to review that information. Please note that EPA Assistant Regional Counsel Gary H. has consented to this request.

We are submitting the original of this letter and one copy to Karen Maples, the Regional Hearing Clerk, and an electronic copy of this letter to Mr. Nurkin.

Thank you for your time and consideration, and please call if you have questions.

Hon. Helen S. Ferrara
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Sincerely,

BOND, SCHOENECK & KING, PLLC

By:



Robert R. Tyson

Att: Certificate of Service

cc: Gary Nurkin, Esq. (via e-mail only)
Assistant Regional Counsel
USEPA, Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866

Karen Maples (via Federal Express)
Regional Hearing Clerk
USEPA, Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866

John R. Wagner, Esq. (URC) (via e-mail only)

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG. II
2013 JAN -4 P 12:00
REGIONAL HEARING
CLERK

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In the Matter of United Refining Company
Docket No. RCRA-02-2012-7504

CERTIFICATE OF SERVICE

Sally May, certifies that on January 3, 2013, she served the original and one copy of the **Request for Extension** in this proceeding by enclosing a true and correct copy of said document in a postage prepaid, properly addressed overnight mailer and depositing same in an official depository of Federal Express overnight delivery service at One Lincoln Center, Syracuse, New York upon:

Karen Maples
Regional Hearing Clerk
USEPA, Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866


Sally May

DATED: January 3, 2013