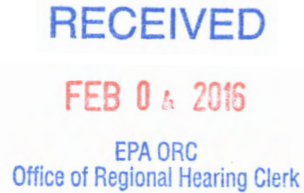


Holland & Knight

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Bonni F. Kaufman
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January 29, 2016

Wanda I. Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency
Region I
5 Post Office Square, Suite 100
Mail Code: ORA18-1
Boston, MA 02109-3912

Re: In the Matter of: Waters Technologies Corporation
Docket No: RCRA-01-2015-0084

Dear Ms. Santiago:

Please find enclosed for filing an original and one copy of Waters Technologies Corporation's Motion for Extension to File Answer in the above referenced matter.

Please do not hesitate to contact me should you have any questions.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Bonni F. Kaufman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bonni F. Kaufman

Cc: Steven Schlang
LeAnn Jensen

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I**

In the Matter of:

Waters Technologies Corporation,
177 Robert Treat Paine Drive
Taunton, MA 02780

Respondent.

) EPA Docket No. RCRA-01-2015-0084
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RECEIVED

FEB 04 2016

EPA ORC
Office of Regional Hearing Clerk

**MOTION OF WATERS TECHNOLOGIES
CORPORATION FOR EXTENSION TO FILE ANSWER**

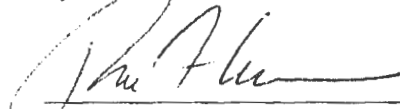
Pursuant to 40 C.F.R. §22.7(b), Respondent, Waters Technologies Corporation, by counsel, respectfully moves the Regional Judicial Officer to extend its deadline to file an Answer in the above referenced matter to March 25, 2016. In support of this motion, Water Technologies provides the following:

1. On October 28, 2015, Complainant filed an Administrative Complaint and Compliance Order (“Complaint”) in this matter alleging that Waters Technologies violated the Resource Conservation and Recovery Act (“RCRA”) and the Massachusetts federally authorized hazardous waste regulations. The Complaint is 50 pages long and contains numerous detailed allegations.
2. On November 19, 2015, Waters Technologies requested an extension to file its Answer to the Complaint in order to provide it additional time to complete an internal evaluation of the allegations in the Complaint, meet with a specialized environmental consulting firm, and discuss potential settlement or resolution of the Complaint with legal counsel for EPA Region 1.
3. On November 23, 2015, the Acting Regional Judicial Officer, LeAnn Jensen, granted Waters Technologies’ motion and set the deadline for Respondent to file its Answer to the Complaint to January 6, 2016.
4. On December 16, 2015, Waters Technologies met with Steven Schlang, Senior Enforcement Attorney, EPA Region 1, to discuss potential settlement or resolution of the Complaint. This settlement conference was productive and the Parties made significant progress toward reaching a resolution of the Complaint.
5. On December 17, 2015, Waters Technologies requested a second extension to file its Answer to the Complaint in order to provide the Parties more time to discuss potential settlement or resolution of the Complaint.

6. On December 24, 2015, the Acting Regional Judicial Officer, LeAnn Jensen, granted Waters Technologies' motion and set the deadline for Respondent to file its Answer to the Complaint to February 7, 2016.
7. Since Waters Technologies' previous request for an extension, the Parties have continued to correspond and progress towards resolution of the Complaint. Despite this continued progress, the Parties do not believe they will have a final agreement in place before February 7, 2016, the deadline for Waters Technologies to file its Answer to the Complaint.
8. An extension to March 25, 2016 will provide the Parties additional time to discuss potential settlement or resolution of the Complaint without requiring Waters Technologies to expend resources on drafting an Answer to the Complaint.
9. On January 27, 2016, counsel for Waters Technologies discussed an additional extension to file its Answer to the Complaint with Steven Schlang, EPA Region 1, and Mr. Schlang agreed to Waters Technologies' request for an extension.
10. By this filing, Waters Technologies does not admit any liability for any of the allegations in the Complaint and reserves its right to file an Answer.
11. There are no other parties in this proceeding other than USEPA and Waters Technologies.

Respectfully submitted,

Waters Technologies Corporation
By Its Counsel



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I

In the Matter of:) **EPA Docket No. RCRA-01-2015-0084**
)
Waters Technologies Corporation,)
177 Robert Treat Paine Drive)
Taunton, MA 02780)
)
Respondent.)

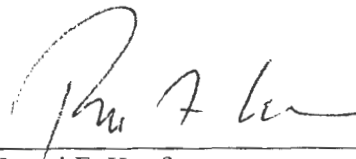
CERTIFICATE OF SERVICE

I certify that on this 29th day of January, 2016, the foregoing Motion of Waters Technologies Corporation for Extension of Time to File Answer was sent to the following persons, by first class mail and UPS Overnight:

Wanda Santiago
Regional Hearing Clerk
U.S. EPA, Region I
Five Post Office Square, Suite 100
Mail Code ORA18-1
Boston, MA 02109

LeAnn Jensen
Regional Judicial Officer
U.S. EPA, Region I
Five Post Office Square, Suite 100
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Steven C. Schlang
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