

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7

901 N. FIFTH STREET
KANSAS CITY, KS 66101

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ENVIRONMENTAL PROTECTION
AGENCY-REGION VII
REGIONAL HEARING CLERK

BEFORE THE ADMINISTRATOR

IN THE MATTER OF)

G. S. Robins and Company)
St. Louis, Missouri 63102)

Respondent.)

Docket No. EPCRA-07-2006-0221

**RESPONDENT G. S. ROBINS AND COMPANY'S UNOPPOSED MOTION
FOR SECOND EXTENSION OF TIME TO ANSWER AND REQUEST HEARING**

COMES NOW Respondent G. S. Robins and Company ("Respondent"), by and through the undersigned counsel, and respectfully requests an extension of time until and including October 3, 2006, to answer and/or request a hearing in the above-referenced matter. In support of this motion, Respondent states the following:

1. On July 7, 2006, the Environmental Protection Agency, Region VII ("EPA"), filed the Complaint in the above-referenced action.

2. The Complaint was served on Respondent on July 10, 2006. On August 7, 2006, the Regional Judicial Officer entered an order allowing for Respondent to file its Answer on or before September 19, 2006.

3. Pursuant to 40 C.F.R. Section 22.07, Respondent's seeks an additional fourteen (14) day extension of time, from September 19, 2006 until and including October 3, 2006, for Respondent to file its Answer to the Complaint.

4. In the above case, EPA and Respondent are engaged in settlement negotiations and the parties are close to a settlement in principle. EPA is reviewing Respondent's proposed supplemental environmental project, to be incorporated into a

Consent Agreement and Final Order. It is anticipated that a signed agreement will be filed before the end of September 2006.

5. Respondent has been authorized to state that EPA does not object to this extension of time.

6. Accordingly, Respondent requests an extension of time to file an answer to the Complaint until and including Tuesday, October 3, 2006.

Date: September 13, 2006

Respectfully submitted,



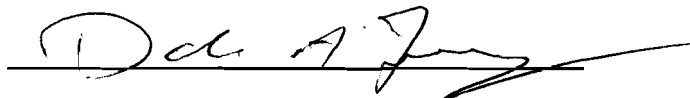
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ATTORNEYS FOR RESPONDENT G. S.
ROBINS AND COMPANY

CERTIFICATE OF SERVICE

The undersigned certifies that on this 13th day of September, 2006, a copy of the foregoing was served via U.S. Mail on the following:

Chris Dudding
Assistant Regional Counsel
United States Environmental Protection Agency
Region VII
901 N. 5th St.
Kansas City, KS 66101

A handwritten signature in black ink, appearing to read "D. A. Dudding", is written over a horizontal line.